

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
25315361	Non-technical summary	"Projected population growth has the potential to increase greenhouse gas emissions from a variety of lifestyle choices such as private vehicle use. Actions and objectives to reduce the borough's carbon emissions will need to take this into account. New development could reduce associated emissions relative to existing developments through appropriate selection of sustainable building design and materials." These statements are misguided. The use of sustainable building materials gives a one-off climate advantage, the use of private vehicles gives an ongoing, continuing and unbounded climate disadvantage. The reduction of private vehicle use is primary, the other considerations are secondary. The reduction of private vehicle use can be best tackled by the judicious spatial distribution of development sites, in terms of minimising car journeys and by creating sustainable configurations for economically viable public transport. In any case, the selection of development sites on the basis of minimising of private vehicle use does not preclude good building practice and sustainable development. Any reduction of private vehicle use is an additional saving over and any savings from other initiatives.	<p>In the next iteration of the SA Report, this paragraph will be reworded and separated as follows:</p> <p>"Projected population growth has the potential to increase greenhouse gas emissions from a variety of lifestyle choices such as private vehicle use. However, there is potential to minimise private vehicle use through the siting of development and providing a mix of uses, in addition to encouraging walking, cycling and public transport use.</p> <p>Tonbridge and Malling Borough Council declared a climate emergency in July 2019. Actions and objectives to reduce the borough's carbon emissions will therefore need to be taken into account in the new Local Plan. New development could reduce building emissions through the appropriate selection of sustainable building design and materials."</p>
25315361	Non-technical summary	'Within 400m of an existing bus stop' is too crude to be an Indicator. Eccles, Burham and Aylesford were promised a bus service of up to 2 buses per hour as part of the Peters village proposal. The bus service has recently been reduced to 2 buses per week. Some sites are within 400m of a bus stop which has 2 buses per week, some sites are within 400m of a bus stop which has a bus every 15 minutes. There is a clear distinction between such cases, they should not be lumped together. 'No major development within AONBs', in the case of the North Downs this target is too restrictive. The views from and of the North Downs are also a consideration. If development is allowed right up to the boundary of the ANOB, then the North Downs could become little more than a backdrop to a clutter of development. Some of the most uplifting views within the Borough are those of the North Downs escarpment viewed across and from the distinctive rural setting below.	<p>As explained in the full Interim SA Report (paras 2.38 and D.2), the site assessment criteria include a number of distance-based criteria used to estimate the likely effects of site options. A number of the appraisal assumptions refer to accessibility from site options to services, facilities, employment, etc. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. Further to this, it categorises distances depending upon the location and purpose of the trip, as 'desirable', 'acceptable' or 'preferred maximum'. Given the wide range of services and facilities normally considered in SAs, LUC has developed some guideline distances that it uses in its SA work, and which are therefore reflected in the site assessment criteria.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>One of the targets in the SA is "No major development within AONBs other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest". This target was originally developed and included as part of the SA Scoping Report. It is in accordance with the National Planning Policy Framework (NPPF), which states that permission for major development within AONBs should be refused. According to the NPPF, major development "is a matter for the decision maker, taking</p>

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			<p>into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined".</p> <p>With regard to development outside of but near to the AONB boundary, the NPPF states "The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas" [emphasis added].</p> <p>The SA gives all sites that are within 500m of the AONB a significant negative (--) effect, in recognition of the potential for development outside of, but near to the AONB, to have an effect.</p>
25315361	Non-technical summary	<p>"Minimise the loss of Grade 1, 2 and Grade 3a ALC land", "Avoid development of 'best and most versatile' soil." With the increase of viticulture within the Borough, this approach is too restrictive. Soil doesn't have to be 'versatile' in order to grow specific specialist crops such as grapes for viniculture. Some of the best wine in the world is produced from some of the poorest quality soil.</p> <p>https://www.vivino.com/wine-news/why-does-poor-quality-soil-make-such-great-wine. In terms of revenue per acre, the economic value of land that is capable of producing good wine is typically far greater than the economic value of Grade 1 land and such land should be regarded as a national asset that should be vigorously protected from development. Furthermore, the terroir for good grape production is a combination of microclimate, soil drainage, and elevation. Within the Borough, land with good characteristics for wine growing is far rarer than is Grade 1 agricultural land. When it comes to protection from development, land suitable for viticulture should be given greater priority than Grade 1 agricultural land. In the first instance, perhaps, there should be a requirement that any developer wishing to build within so many metres of an existing vineyard should have to commission a study on the wine production potential of the proposed development site.</p>	<p>The Agricultural Land Classification (ALC) is commonly used in SA, as it provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development.</p> <p>The ALC classifies agricultural land into five grades. Grade 1 is the best quality and Grade 5 is the poorest quality. A number of criteria inform the ALC, including climate (temperature, rainfall, aspect, exposure, frost risk), site (gradient, micro-relief, flood risk) and soil (depth, structure, texture, chemicals, stoniness) for England only.</p>
42487649	Non-technical summary	<p>Site 59703/59617 residential are listed twice but are the same. I am not sure why? This site (both 59703/59617) on Potash Lane is located in an area of difficult access. Currently the single lanes are used by local people who often walk for exercise and use their cars when needed. On street parking is extremely limited and access via all routes is not easy. A part of Comp Lane is a non HGV route. The turn at the junction of Long Mill lane into Potash Lane is extremely acute for a vehicle/car turning. The site specified is open land and is situated within 250m of a heritage asset as well as being within 250m of one or more internationally/nationally designated biodiversity/geodiversity sites. This area is green open space that would be lost as a result of a new development and negatively affect the street scene of the existing settlement of houses some of which are listed.</p>	<p>Sites 59703 and 59617 are not the same. The boundary for site 59703 does not include the house on Potash Lane whereas the boundary for site 59617 does.</p> <p>The SA is high-level and therefore does not give consideration to site-specific access and turning points. This is something that will instead be considered at planning application stage. Both sites do, however, receive a significant negative effect in relation to SA objective 2: services and facilities, as they are both recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band.</p> <p>The sites both receive an uncertain minor negative effect in relation to the landscape and townscape, and an uncertain significant negative effect in relation to the historic environment. This is in accordance with the site assessment criteria.</p>

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42587297	Non-technical summary	SA 1 on Health fails to take into account the role of the local food system and healthy diets in promoting health and wellbeing. Poor diets are one of the biggest drivers of morbidity and mortality. Fuel and food poverty, the local food environment including the positioning of fast food outlets (near schools), advertising, school meals and standards, all impact on local diets. An integrated approach that looks at health, sustainable transport and the local food systems is more likely to help tackle health inequalities. This is missing from the objectives. The linkages between many of these objectives are not taken into account - there are wins to be had by looking across all of these objectives and bringing them together - for example, emissions reduction and growth opportunities arising from the circular economy and better management of waste; health benefits of sustainable transport options; etc.	<p>The SA is limited in how it can assess healthy eating, as this is highly dependent on people's personal eating habits. However, there is potential for the SA to assess access to things like allotments and community gardens where local food growing may be encouraged. In the next iteration of the SA Report, the following sub-objective will be added under SA objective 1: health and wellbeing:</p> <p>"To improve access to allotments and community gardens to encourage local food growing and healthy eating."</p> <p>It is not the role of the SA to limit the positioning of fast food outlets.</p> <p>There is some overlap between the topics covered by the SA objectives. The issues of most relevance to each SA objective have been placed under that SA objective and not any others, so as to avoid duplication of effects.</p>
42171937	Non-technical summary	Regarding SA 9: Avoid development of 'best and most versatile' should be top of the list of sub-objectives in view of recent food shortages and price hikes due to the war in Ukraine.	The sub-objectives in Chapter 3 of the Interim SA Report are not written in order of importance. Therefore, the sub-objective "Avoid development of 'best and most versatile' soil" will remain where it is.
42171937	Non-technical summary	Objective 9 Target – STRONGLY DISAGREE Minimise the loss of Grade 1, 2 and Grade 3a ALC land. Should be ZERO LOSS OF Grades 1,2,3a ALC Land.	This target is considered appropriate, as it would not be possible to deliver the amount of housing needed and avoid development on Grades 1, 2 and 3a agricultural land. Sites that are located on Grades 1 and 2 agricultural land are, however, given a significant negative effect in the SA. Sites located on Grade 3 agricultural land are given an uncertain significant negative effect as it is unknown whether they comprise Grade 3a (high quality) or 3b (not classed as high quality) agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification. The Post 1988 Agricultural Land Classification can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the Borough.
25349153	Non-technical summary	This Sustainability Report could not have been more poorly designed. The choice of colours to score sites against the objectives is not logical (can't easily see whether a particular colour scores highly or not) but, more fundamentally, is impossible to view by those who are colour blind. A numeric score would have been simpler and easier to follow. So many of the comments are very subjective and/or have question marks as the score depends on the design of the development. Similarly, the listing of sites is designed to be unhelpful. A five figure identity number is used when there are only 291 sites. The use of postcodes was also misleading – eg the NAIB site (59856) is in East Malling, not Ditton and site 59756 is in East Malling and not Leybourne. The sites should have been given consecutive numbers within each parish, and within each parish perhaps numbered with regard to geography. Instead, many people will have spent many hours having to look through all 291 sites to find their local ones since they are not even presented in number order. It was only late in the process that sites could be seen by inputting their ID number.	<p>The PDF version of the Non-Technical Summary available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template abides by WCAG 2.1 regulations to the highest standard (level AAA). The report is therefore accessible to those who are colour blind.</p> <p>Due to the high-level nature of SA, uncertainty has been added to some of the effects. This is because they depend on the final design, scale and layout of development, which will not be determined until planning application stage.</p> <p>The ID numbers for each site were autogenerated. These site reference numbers are consistent across all Local Plan documents to allow for cross referencing. In the next iteration of the SA Report the proformas will be structured by ward and a Contents page provided.</p>

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25310017	Non-technical summary	Option of not meeting housing requirement hasn't been assessed. The SA confirms that of the two quantum options meeting assessed need (only) performs best in term of the sustainability objectives. It is clear from the SA that option 5 (new settlement) does not perform as well as options 1-3. It is clear from the SA that optimising densities performs better against the sustainability objectives than a conservative application of density.	The full Interim SA Report at paragraph 4.5 states "No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the evidence shows is needed. In these circumstances, the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative".
42832705	Non-technical summary	For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: to achieve SA 2. it needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use (SA10); additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat (SA 5 and SA 6) through disruption of wildlife habitats and interruption of dark skies environments; the scale of the developments will materially impact what has been described in the East Malling Conservation Study as an areas of Unspoilt beauty and would disturb the distinct, historic characters of East Malling and West Malling villages. Regarding SA 11 and 12: Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity). Regarding SA 14: Of the proposed developments only a very small proportion are affordable to young buyers in the local demographic.	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, explore the distance sites are to services and facilities under SA objectives 1: health and wellbeing, 2: services and facilities and 3: education. Biodiversity is covered under SA objective 5: biodiversity and geodiversity and the historic environment is covered under SA objective 7: heritage. Information on how sites have been appraised against each of these objectives is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p> <p>SA objective 11: climate change adaptation does not look at biodiversity and air quality, as these issues are separately covered under SA objectives 5 and 12, respectively. Housing delivery, including affordable housing delivery is covered under SA objective 14: housing.</p>
42213665	Non-technical summary	Generally, I think the Interim Sustainability Appraisal has sound methodology and addresses all key issues. I hope that it proves successful in ensuring that there is correct and consistent consideration of all issues across every site identified for potential development and that standards are not watered down over time because of political or economic pressures.	Support noted.
42404257	Non-Technical Summary	Do please check existing levels of infrastructure, for example in the case of Watlingbury the roads are already challenged, the school is a	Infrastructure will be dealt with separately through the Council's Infrastructure Delivery Plan. The SA does not take into consideration the capacity of medical centres or schools, which is more of a matter

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		one class intake and the doctor's surgery is not taking any more onto its roll....	for plan-making and the Infrastructure Delivery Plan. The site assessment criteria do, however, acknowledge that with regards to medical centres "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). The site assessment criteria also acknowledge that with regards to schools, "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage".
42437217	Non-Technical Summary	The Grange farmlands fields back on to my house in Fleming Way. The fields are very susceptible to flooding during prolonged rain! There is also the issue of the CLH OIL PIPELINE which runs through/ across these fields!!!! Has anybody thought of this obstacle?? I have lived at my present house for over 40 years and every year there has been various alternating crops grown in these fields and very recently there have been Red kites and different species of bats returning to these fields. The fact that this is green belt area seems to be deemed acceptable in this day and age. I can irrevocably condemn any housing development of any sort on the aforementioned lands.	<p>Flood risk is covered under SA objective 8: water. Sites 59690, 59805 and 59809 all receive significant negative effects in relation to SA objective 8, as they are at a 1 in 30 year risk of surface water flooding. All effects against this objective are recorded as uncertain, as all three sites contain water bodies but it is unknown what effects development could have on water quality.</p> <p>The SA is too high-level to consider the presence of oil pipelines.</p> <p>Biodiversity is dealt with under SA objective 5: biodiversity and geodiversity. All three sites receive significant negative effects in relation to SA objective 5, as they are within close proximity of ancient woodland.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>
38532513	Non-Technical Summary	I agree that option 1 is better for minimising land take, cutting down travel and therefore reducing the impact on traffic congestion and on air quality and climate emissions; but I am worried about the impact on water and on available green space for residents within the town. I feel it very important to ensure that children have access to close play spaces, and also that any mature trees should be left. It seems crazy to be cutting down any trees at the same time as urging people to plant more (thinking of the site on Bishops Oak Ride). I am worried about the impact on water and flooding because almost all of Tonbridge is a high flood risk area.	The SA does give consideration to the impact of development on flood risk, under SA objective 8: water – see site assessment criteria contained in Appendix D of the Interim SA Report. The SA also gives consideration to loss of open space under SA objectives 1: health and wellbeing and 6: landscape and townscape, and biodiversity assets including trees under SA objective 5: biodiversity and geodiversity. Further information is contained in Appendix D.
38532513	Non-Technical Summary	It is very difficult to quantify the affects of the different 3 options for preventing the merging of settlements in the NE of the borough in isolation from the rest of the borough. I say this because if little development is allowed around eg West Malling station, more development will be needed elsewhere in the borough in order to fulfill the housing needs. This is an area that has far less risk of flooding than Tonbridge or Snodland, and so although 6 is improved	The Strategic Policy Options are very high-level and so the appraisal of these options is also high-level. As the specific location of development is unknown, no positive or negative effects have been recorded in relation to SA objective 8: water, which considers flood risk. SA objective 11: climate change mitigation does not specifically relate to flood risk but does cover extreme weather events as a result of climate change, which includes flood risk. As the specific location of

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		for that area of the borough by taking options 1 or 2, 8 and 11 will be very much worsened if other parts of the borough with high flood risk take more development. 4, 11 and 12 would be improved if development took place close to West Malling station because this would minimise traffic congestion.	development is unknown, negligible effects are also recorded against SA objective 11. Option 3 receives a minor positive effect in relation to SA objective 4: economic growth, as this option is more likely to contribute to meeting housing and employment needs within Tonbridge and Malling. The effect is recorded as uncertain, as it is dependent on whether sites for development are allocated in this area or not. Options 1 and 2 instead receive minor negative effects in relation to this objective, as they would restrict land coming forwards to meet the housing and employment needs of the Borough. Negligible effects are expected in relation to SA objective 12: air pollution, due to the high-level nature of these options.
42487649	Non-Technical Summary	Any proposed housing development does not take into account the number of cars per household and base their calculations on outdated government guidelines. Additionally, any apartments that are built have Service Charges that if not managed properly are unaffordable. There are models where owners/residents have an elected board to monitor value for money.	It is not within the scope of the SA to explore the number of cars that will be generated per each new household. The Interim SA Report provides an appraisal of all reasonable alternative development site options to inform the Council's decisions regarding which sites to allocate. The sites they allocate will be determined later in the plan-making process. It is also not within the scope of the SA to explore service charges. It is important to note that the SA is one of many factors that feed into the plan-making process.
42487649	Non-Technical Summary	The need for an efficient broad band provider is a must for the borough. The use of I.T has expanded since the Covid Pandemic and not all areas in Tonbridge & Malling have fibre, which is needed.	The SA does not take into consideration Broadband because this is a very localised issue, the status of which can change very quickly. The Government has several programmes in place with the aim to increase speeds and access to Broadband for homes and businesses.
25315361	Non-Technical Summary	No one can disagree with the objective to reduce crime and antisocial behaviour, but there is a danger that this is addressed by solutions that are too simplistic. One only has to look at mistakes made by planners of the past. Recent planning applications seem to favour wide open spaces lacking in privacy and the removal of back alleys and cut throughs. (Although, interestingly, some of the older neighbourhoods of Kings Hill are attractive because they adopt the opposite approach.) The risk here is that attempts to reduce crime could lead to developments that feel sterile rather than organic so that people feel detached from their environment and no longer identify with their neighbourhood. This lack of identification can itself lead to vandalism. In summary, people who commit crime or display antisocial behaviour are often detached from the community. This can be best addressed by attractive developments with a genuine neighbourhood feel.	There are a number of sub-objectives to SA objective 1: health and wellbeing that cover crime. These sub-objectives act as a starting point for the identification of effects that policies within the Local Plan are likely to have.
42723809	Non-Technical Summary	I live in Watlingbury and the air quality is really under pressure because of the high volume of traffic that uses the A26 and surrounding roads. Any further residential development in this area would not be sustainable and would degrade even further the air quality and consequently local people's quality of life and health.	The SA gives consideration to air quality under SA objective 12: air pollution. If a site is within 100m of an Air Quality Management Area (AQMA), it receives a significant negative effect in relation to this objective. As Watlingbury contains an AQMA, all sites in and around this settlement will have received a significant negative effect against SA objective 12, provided they are within 100m of the AQMA.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			Future iterations of the SA will contain a cumulative effects section, which will consider the overall impact of development on air quality. The Council will also be commissioning additional evidence on matters including traffic and air quality.
42792257	Non-Technical Summary	Measuring sustainability against social, economic and environmental issues is overly simplistic. Sustainability is an ambiguous word that has never been clearly defined. It is however clear that social, economic and environmental demands will always be in conflict and history tells us that the environment will always be the loser when money and human requirements are at stake. I see nothing in your vision, policy or monitoring proposals that alter this basic dynamic.	<p>The most widely used and accepted definition of sustainable development is "development that meets the needs of the present without compromising the ability of future generations to meet their own needs" - World Commission on Environment and Development (1987) 'Our Common Future'. Published in the Brundtland Report, this definition is built around three dimensions: environmental, social and economic. These three aspects of sustainable development arguably complement one another, although it is argued by some that in reality they are in conflict with each other.</p> <p>As explained in paragraphs 1.10 to 1.13 of the Interim SA Report, SA is an assessment of the likely effects of a plan or programme (in this case TMBC's Local Plan) on the environmental, social and economic aspects of sustainable development. SA is the UK transposition of the European SEA Directive into English and Welsh Planning law (SEA considers only the environmental effects of a plan). The National Planning Policy Framework confirms the requirement for SA, and SA should be submitted alongside a plan for examination, as it is examined as part of the evidence base for a plan. The monitoring indicators proposed in Chapter 6 of the Interim SA Report cover environmental, social and economic topics.</p>
42588673	Non-Technical Summary	It is not clear how any of these objectives can be fulfilled without greater and urgent attention to the provision of increased capacity on the highways; better control over traffic speeds; improved community facilities (medical, educational, public transport, water supply etc).	<p>The SA is too high-level to consider specific road networks and traffic congestion. The Council will, however, commission evidence on transport.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, be it policy options or site options. Consideration is given to healthcare provision under SA objective 1: health and wellbeing, educational provision under SA objective 3: education and public transport under SA objective 10: climate change mitigation. Water is dealt with under SA objective 8: water, although this objective covers flood risk and water quality more than supply. Information on water supply is, however, provided in the baseline information (Appendix C of the Interim SA Report). If improvements are proposed to community facilities through policies in the Local Plan, these will be subject to SA.</p>
42213665	Non-Technical Summary	Generally, I think the Interim Sustainability Appraisal has sound methodology and addresses all key issues. I hope that it proves successful in ensuring that there is correct and consistent consideration of all issues across every site identified for potential development and that standards are not watered down over time because of political or economic pressures.	Support noted.
42487649	Non-Technical Summary	This appraisal must consider the impact on the area involved - the natural environment area as well as the built environment.	The SA gives consideration to the natural environment under SA objective 5: biodiversity and geodiversity. Consideration is also given

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			<p>to the built environment under SA objectives 6: landscape and townscape and 7: heritage.</p> <p>Further to this, future iterations of the SA will contain a cumulative effects section which considers the overall effects of the Local Plan on the Borough, including the natural and built environment.</p>
42171937	Non-Technical Summary	Objective 9 Target - STRONGLY DISAGREE "Minimise the loss of Grade 1, 2 and Grade 3a ALC land." Should be ZERO LOSS OF Grades 1,2,3a ALC Land.	This target is considered appropriate and in line with government policy. Sites that are located on Grades 1 and 2 agricultural land are, however, given a significant negative effect in the SA. Sites located on Grade 3 agricultural land are given an uncertain significant negative effect as it is unknown whether they comprise Grade 3a (high quality) or 3b (not classed as high quality) agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification. The Post 1988 Agricultural Land Classification can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the Borough.
42587297	Non-Technical Summary	<p>SA 1 on Health fails to take into account the role of the local food system and healthy diets in promoting health and wellbeing. Poor diets are one of the the biggest drivers of morbidity and mortality. Fuel and food poverty, the local food environment including the positioning of fast food outlets (near schools), advertising, school meals and standards, all impact on local diets. An integrated approach that looks at health, sustainable transport and the local food systems is more likely to help tackle health inequalities. This is missing from the objectives.</p> <p>The linkages between many of these objectives are not taken into account - their are wins to be had by looking across all of these objectives and bringing them together - for example, emissions reduction and growth opportunities arising from the circular economy and better management of waste; health benefits. of sustainable transport options; etc.</p>	<p>The SA is limited in how it can assess healthy eating, as this is highly dependent on people's personal eating habits. However, there is potential for the SA to assess access to things like allotments and community gardens where local food growing may be encouraged. In the next iteration of the SA Report, the following sub-objective will be added under SA objective 1: health and wellbeing:</p> <p>"To improve access to allotments and community gardens to encourage local food growing and healthy eating."</p> <p>It is not the role of the SA to limit the positioning of fast food outlets.</p> <p>There is some overlap between the topics covered by the SA objectives. The issues of most relevance to each SA objective have been placed under that SA objective and not any others, so as to avoid duplication of effects.</p>
42171937	Non-Technical Summary	<p>Regarding SA 9:</p> <p>"Avoid development of 'best and most versatile' soil" should be top of the list of sub-objectives in view of recent food shortages and price hikes due to the war in Ukraine.</p>	The sub-objectives in Chapter 3 of the Interim SA Report are not written in order of importance. Therefore, the sub-objective "Avoid development of 'best and most versatile' soil" will remain where it is.
42832705	Non-Technical Summary	For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: \to acheive SA 2. it needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use (SA10); additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat (SA 5 and SA 6) through disruption of wildlife habitats and interruption of "darkskies" environments; the scale of the developments will materially impact	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, explore the distance sites are to services and</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>what has been described in the "East Malling Conservation Study" as an areas of "Unspoilt beauty" and would disturb the distinct, historic characters of East Malling and West Malling villages</p> <p>Regarding SA 11 and 12: Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity)</p> <p>Regarding SA 14: Of the proposed developments only a very small proportion are affordable to young buyers in the local demographic</p>	<p>facilities under SA objectives 1: health and wellbeing, 2: services and facilities and 3: education. Biodiversity is covered under SA objective 5: biodiversity and geodiversity and the historic environment is covered under SA objective 7: heritage. Information on how sites have been appraised against each of these objectives is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p> <p>SA objective 11: climate change adaptation does not look at biodiversity and air quality, as these issues are separately covered under SA objectives 5 and 12, respectively. Housing delivery, including affordable housing delivery is covered under SA objective 14: housing.</p>
42052833	Non-Technical Summary	Table 5.2 For some reason our submission under site refence 59606 (Employment Site) has not been recorded under table 5.2 in the Sustainability Report. Our comments however, on site 59604 in relation to Table 5.1 remain relevant.	Site 59606 is a duplicate of 59604. 59604 is the definitive reference number for this site.
42832705	Non-Technical Summary	<p>For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: It needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use; additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat through interruption of "darkskies" environments. Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity)</p>	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, give consideration to the landscape and what effects development wil have on the landscape, under SA objective 6: landscape and townscape.</p> <p>Biodiversity is addressed under SA objective 5: biodiversity and geodiversity. Information on how sites have been appraised against this objective is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p>
25349153	Non-Technical Summary	This Sustainability Report could not have been more poorly designed. The choice of colours to score sites against the objectives is not logical (can't easily see whether a particular colour scores highly or not) but, more fundamentally, is impossible to view by those who are colour	The PDF version of the Non-Technical Summary available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>blind. A numeric score would have been simpler and easier to follow. So many of the comments are very subjective and/or have question marks as the score depends on the design of the development.</p> <p>Similarly, the listing of sites is designed to be unhelpful. A five figure identity number is used when there are only 291 sites. The use of postcodes was also misleading - eg the NAIB site (59856) is in East Malling, not Ditton and site 59756 is in East Malling and not Leybourne. The sites should have been given consecutive numbers within each parish, and within each parish perhaps numbered with regard to geography. Instead, many people will have spent many hours having to look through all 291 sites to find their local ones since they are not even presented in number order. It was only late in the process that sites could be seen by inputting their ID number.</p>	<p>abides by WCAG 2.1 regulations to the highest standard (level AAA). The report is therefore accessible to those whose are colour blind.</p> <p>Due to the high-level nature of SA, uncertainty has been added to some of the effects. This is because they depend on the final design, scale and layout of development, which will not be determined until planning application stage. The ID numbers for each site were autogenerated. These site reference numbers are consistent across all Local Plan documents to allow for cross referencing, In the next iteration of the SA Report the proformas will be structured by ward and a Contents page provided.</p>
42832705	Non-Technical Summary	<p>For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: It needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use; additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat through interruption of "darkskies" environments. Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity)</p>	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, give consideration to the landscape and what effects development will have on the landscape, under SA objective 6: landscape and townscape.</p> <p>Biodiversity is addressed under SA objective 5: biodiversity and geodiversity. Information on how sites have been appraised against this objective is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p>
42052833	Non-Technical Summary	<p>For some reason our submission under site reference 59606 (Employment Site) has not been recorded under table 5.2 in the Sustainability Report. (xxx)</p> <p>Our comments however, on site 59604 in relation to Table 5.1 remain relevant.</p>	<p>Site 59606 is a duplicate of 59604. 59604 is the definitive reference number for this site.</p>
44275681	Non-technical summary	<p>"The Assessment of the Quantum Options</p> <p>Whilst we note that the SA acknowledges at para 4.5 that 'the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative', and agree with that statement; we are, as set out above, somewhat confused as to whether the SA has in fact tested the effects of</p>	<p>The quantum options subject to SA were identified by TMBC. It is reasonable, as a starting point, for one quantum option to be the assessed need generated by the Government's standard method. Quantum Option 2 is the assessed need + up to 10% therefore providing a buffer.</p> <p>The reasoning behind the effects each Quantum Option is expected to have is outlined in paragraphs 4.6 to 4.10 of the full Interim SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>delivering the LHN figure + 10% or a supply that is 10% above the HLN which is a different scenario.</p> <p>With the above in mind, we fail to see why table 4.1 suggests that Option 1 (LHN) scores a minor positive for objectives 1, 2 and 3, yet Option 2 (LHN+10%) scores a mixed minor effect for all three. Option 2 in providing more housing has the ability to help to address the issue of affordability and thus improve the health and well-being of those in housing need, especially the homeless (SA objective 1). Para 4.6 appears to totally ignore the issue of affordability and its effects on health or indeed the fact that housing actively contributes to the delivery of health services. Likewise Option 2 has the greater ability to improve equality and access to community facilities and services (SA objective 2) than Option 1, given its ability to address the issue of homelessness and affordability which we note is a sub objective of objective 2 according to p70 of the SA. Furthermore, Option 2 would definitely help address the need to provide a suitable supply of high quality housing, including an appropriate mix of sizes, types and tenures (SA objective 14). Why Option 2 scores a significant positive (likely effect uncertainty) when Option 1 also scores a significant positive is truly bizarre. Whilst we note that para 4.9 of the SA suggests that the scale of housing delivery associated with Option 2 is 'in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study', and that as a result there is 'uncertainty attached to this option as there is a question mark around its deliverability'; this is not in our opinion a reason for the SA to reduce the score attributed to Option 2. Deliverability is an issue for the planning authority in determining the spatial strategy – not the SA. To this end we note that the Housing Market Delivery Study (HMDS) examines past delivery rates and uses these to make assumptions as to the capacity of the area to deliver homes in the future. Whilst helpful to understand the rate at which homes have been delivered in the past, we would argue against whether this should be used as an indication of future delivery rates. The ability of an area to support housing growth will relate principally to the range of sites allocated through the chosen spatial strategy rather than an innate capacity in the market as to the amount of growth that can be achieved. The Council should not be seeking to limit growth on the basis of what has been achieved in the past.</p> <p>The Assessment of the Spatial Options Reviewing table 4.2 spatial Option 3 (Development focused on sites within as well as adjacent to defined urban and Rural Service Centre settlements) appears to attain the most positive scores, with equal top scores in respect of SA objectives 1, 2, 3, 4, 5, 7, 8, 10, 11, 12, 13 and 14, and second equal on SA objectives 6 and 9. On this basis it would appear to us to be the option that most closely meets the SA objectives, and it is surprising that the SA does not actually say this explicitly.</p> <p>In addition to the above we are, we have to say, somewhat perplexed as to how spatial Option 1 scores so highly on SA objective 2 (to improve equality and access to community facilities and services) when, by directing most growth towards the northern part of the</p>	<p>Report. Quantum Option 2 receives minor negative effects (as part of a mixed minor effect) against SA objectives 1: health and wellbeing, 2: services and facilities, and 3: education because as explained in the report, delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities, services and facilities, and schools. However, the Interim SA Report also acknowledges that the extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities.</p> <p>We note that there is some crossover between the SA objectives and although the delivery of affordable housing will have beneficial effects on health and wellbeing, housing delivery (including affordable housing delivery) is addressed separately under SA objective 14: housing. Quantum Options 1 and 2 will both provide a significant amount of new housing and therefore both receive a significant positive effect in relation to SA objective 14. In terms of Quantum Option 2 delivering more housing than Quantum Option 1, the SA acknowledges in paragraph 4.9 that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents" [emphasis added].</p> <p>Although the significant positive effect for Quantum Option 2 against SA objective 14 is recorded as uncertain, this is not a reduction to its score as suggested by the respondent. The SA states in paragraph 4.9 (see above quote) that Quantum Option 2 has a particularly significant positive effect. The reasoning behind the uncertain effect is appropriate.</p> <p>It is important to note that although Quantum Option 2 receives minor negative effects in relation to SA objectives 1, 2 and 3, it also receives minor positive effects. The fact Quantum Option 2 will help in the delivery of affordable housing is acknowledged in the SA. In the next iteration of the SA Report, the sub-objective "To tackle homelessness more effectively" will be moved to underneath SA objective 14: housing.</p> <p>Spatial Option 3 does perform very strongly in relation to the SA objectives compared to the other options, as does Spatial Option 2. It is important to note that SA is a high-level tool used to identify the likely sustainability effects of a Local Plan, and is one of many factors that feed into the plan-making process.</p> <p>Affordability is not addressed under SA objective 2: services and facilities, and is instead addressed under SA objective 14: housing. Affordability is an issue across the Borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Borough it will not address the affordability issues in the southern part of the Borough, which given the southern part of the Borough's location within the WKHMA and thus the amalgam of the 3 least affordable Boroughs/ district in the county, would suggest anything that directs growth away from this area should obtain a much lower score. To this end</p> <p>we note that para 4.18 of the SA highlights the fact that there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis within the HMA's and that a sustainable pattern of development should seek to address the need where it arises, i.e. within each HMA. Spatial Option 1 simply would not do this and would exacerbate the affordability issue within the southwestern part of the Borough, where it is at its most acute.</p> <p>With regard to the Future Options of Tonbridge, Section 11 of the NPPF requires planning policies to promote an effective use of land in meeting the need for homes and other uses and paragraph 124 sets out key considerations that should be taken in this regard.</p> <p>Furthermore, NPPF paragraph 125 states: "plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination" It then follows that, the optimisation of densities on development sites within Tonbridge (Option 1) is recognised on the basis that the best use of previously developed land clearly scores well in SA terms. However, this does not mean that a brownfield alone approach should be taken given that an insufficient amount of sites within the urban area have been identified to accommodate the growth within the Urban Capacity Study and notwithstanding the complexities that can arise with brownfield sites that can affect delivery rates. It is essential that a sufficient amount and variety of land can come forward where it is needed in accordance with NPPF paragraph 60. It should also be noted that the delivery of Brownfield land can be longer due to the risks of complications during construction given the nature of the previous use. Therefore, to ensure the delivery of the housing need within the first five years of the plan period, it is essential that Greenfield land is also allocated and optimised. Thus, aspects of Option 2 can be deemed sustainable, notably where high quality and deliverable development results."</p>	
44275681	Non-technical summary	<p>"The following comments are made in respect of the SA for both sites 59764 & 59765:</p> <p>SA1 – Incorrect assessment. The site may be greenfield land but it is not open space accessible to the public and does not contain sports facilities. PRoW fall adjacent to the west of the site and these could be enhanced and extended as part of a residential development, delivered through an allocation. This would increase recreational opportunities for the community. New public open space, habitats and play space will be provided within the development increasing the ability of this area to improve health and wellbeing. Change to Minor or Significant Positive.</p>	<p>With regard to SA objective 1: health and wellbeing, sites 59764 and 59765 are incorrectly recorded as containing open space. The reason both sites are recorded as containing open space is that they slightly overlap open space and so the GIS analysis identified both sites as containing open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, both sites will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 2: services and facilities, both sites are recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receive a minor negative effect</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA2 - The site is within a short distance of the town centre on the outskirts of Tonbridge; unlike other parts of the borough, there is easy access to local shops and services. Public transport is readily available here. The previously SA for the Reg19 withdrawn plan assessed the site as “adjacent to the Tonbridge urban area, and as such has good access to services and facilities. However the size of the site is unlikely to deliver any new services and may place pressure on existing facilities” in respect of the objective for improved access to services and facilities. The larger site (Ref: 59765) includes additional land that is available for the delivery for such uses of there is a demonstrated need. Thus improving facilities in the immediate It is unclear how TMBC’s assessment has changed so considerably since this earlier conclusion, therefore we disagree with this SA assessment and instead the same score should be given (Neutral or Minor Positive).</p> <p>SA4 – It is agreed that the residential development may not deliver any employment opportunities unless evidence demonstrates a need. However, all residential development will provide local jobs during the construction stage and additionally under any management requirements. As such, a Minor Positive should be included rather than negligible. It must be noted, that in respect of site ref. 59765 Redrow is not promoting the land for any significant employment provision, rather the positive economic benefits cited as associated more with the indirect economic benefits from housing.</p> <p>SA5 – This score should change. The Reg19 SA was neutral for short and medium term; positive for long term. It stated that “The scale of the site provides potential for the provision of multifunctional Green Infrastructure in line with the Councils Open Space Policy which in the long term could enhance the ecological networks of the borough.” Allocation of the site will enable a landscape led scheme to be delivered, that includes significant biodiversity enhancements, including the 10% BNG required from 2023. Thus, a Neutral or Minor Positive score is more appropriate and reflects TMBCs earlier assessment.</p> <p>SA6 – A masterplan has been prepared and will be submitted to TMBC in due course. This demonstrates that townscape and landscape characters are protected. This SA assess that the site is not located near any settlements in rural locations and would result in the loss of designated open space. This is an irrelevant and incorrect assessment, thus it is not relevant whether the site is near to a rural settlement as it is adjacent to the main town in the borough. Furthermore, the site is not designated open space. The withdrawn Reg19 SA for the site recognised that: “This site is adjacent to the Tonbridge urban area, and...has good access to services and facilities”. The Sites’ proximity to the AONB is noted in this SA setting out that the effects on the AONB are uncertain. Regard should be given to the the previous assessment within the Reg19 SA which stated: “This site is located outside of a Biodiversity Opportunity Area. There are no natural or heritage assets present on site. The site is located away from the High Weald AONB but falls within its setting. The elevated section of the A21, to the south of the site, provides some screening, therefore limiting the sites</p>	<p>against this objective. The previous SA is not relevant, as it was an SA of a different plan and so does not form part of this SA.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Site 59765 has been appraised as a mixed use site.</p> <p>With regard to SA objective 5, this relates to biodiversity and geodiversity, not open space which is addressed separately under SA objective 1. This is a 'policy-off' appraisal and so it does not take into consideration mitigation (e.g. landscaping and BNG). This ensures all sites are appraised on a consistent basis. The previous SA is not relevant, as it was an SA of a different plan and so does not form part of this SA.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59764 and 59765 are recorded as having uncertain significant negative effects in relation to this objective, as they are both located within 500 of the AONB. The proforma incorrectly identifies both sites as containing open spaces, which will be corrected in the next iteration of the SA.</p> <p>With regard to SA objective 7: heritage, the effects given for both sites are considered appropriate. These are 'policy-off' appraisals that do not take into consideration mitigation, rather they are based on the physical constraints of each site. This ensures all sites are appraised in a consistent manner.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>impact on the setting. However regard should be had to the views south towards the Bidborough Ridge. As such development in this location protects natural and heritage assets by locating development outside of these constraints. The scale of the site provides potential for the provision of multifunctional Green Infrastructure in line with the Councils Open Space Policy which in the long term could enhance the ecological networks of the borough." The assessment concluded Neutral and Minor Positive effects. The current SA contradicts this and there is no evidence to support the departure from the earlier conclusions , as such, the SA should be amended to a Neutral and Minor Positive effect.</p> <p>SA7 – The SA concludes an uncertain and significantly negative effect given the site's location within 250m of a heritage asset and notes that the impact is dependent on the design of the development and whether the assets are visible from the development. Lower Haysden Conservation Area is circa 150m to the west of the site boundary and the closest listed building (Grade II listed Manor Farm Oast) is approximately 200m to the south west of the site boundary. Thus there is a sufficient physical buffer provided to the development. Furthermore, the proposal can include enhancements to the existing field boundaries which currently comprise mature hedge/tree rows."</p>	
44275681	Non-technical summary	<p>"As such, masterplanning for the site ensures that the heritage assets and their setting is protected. TMBC is aware of this from the withdrawn Local Plan evidence base, reps and submission documents. These remain relevant to the site and its suitability for allocation. In due course, during the site promotion, this further evidence will be shared with TMBC.</p> <p>SA8 – Incorrect assessment. The SA states that the site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. However, an area to the north of the site falls within Flood Zone 2, the remainder of the site is within Flood Zone 1 as set out on the EA Flood Maps. Therefore no residential development will be in this area and a substantial proportion of the Site remains available and suitable for residential development. The Site is shown to be predominantly at 'Low' risk of surface water flooding and SUDs will be incorporated into the proposed layout.</p> <p>The assessment also notes the site's location within the source protection zone. This protection zone covers most of the undeveloped area of Tonbridge so any development within the most sustainable settlement will be subject to this constraint.</p> <p>It is noted that the previous SA rated this objection as 0 stating: "Development of this scale would be expected to include onsite SUDS to manage run-off into water courses in order to minimise opportunities for pollution." This remains relevant and as such the proposed assessment should be Negligible (0).</p> <p>SA9 – Best and Most Versatile agricultural land is graded 1 to 3a. Natural England's Land classification map indicates the site is within</p>	<p>The proformas for sites 59764 and 59765 state that they are either entirely or significantly within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, both sites contain land with a 1 in 30 year risk of surface water flooding. Therefore, it is correct that both sites receive uncertain significant negative effects in relation to SA objective 8: water. These are 'policy-off' appraisals and so consideration is not given to mitigation (e.g. SuDS). This ensures all sites are appraised on a consistent basis. The SA correctly identifies both sites as falling within a Source Protection Zone and as the respondent has said, other sites in this area will also be subject to this constraint.</p> <p>The previous SA is not relevant, as it was an SA of a different plan and so does not form part of this SA.</p> <p>With regard to SA objective 9: soil, the SA correctly identifies the site as comprising Grade 3 agricultural land and so it receives a significant negative effect in relation to this objective. As stated in the proforma, the effect is recorded as uncertain as it is unknown whether the site comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p> <p>SA objective 10: climate change mitigation looks at access to public transport. As both sites are within 400m of a bus stop, they receive minor positive effects in relation to this objective.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Grade 3. It is noted that this map does not divide into the subgrade 3a. Further evidence can be provided to detail this. However, given the scale of the site and the amount of identified Grade 3 land, the development of this site would not have a significant impact on the level of good to moderate quality agricultural land. Thus, this should be amended to a Minor Positive/Negligible.</p> <p>SA10 – The SA concludes that this Site would have a minor positive effect in reducing greenhouse gas emission. It is considered that this assessment should be more positive for the following reasons,</p> <p>The site is adjacent to the most sustainable and accessible town in the whole borough and a prime location to encourage sustainable transport modes and reduce reliance on private cars. It is approximately 1.7km from the train station approximately 20 minutes walking. Improved cycle connections are approved via recent planning approval Ref: TM/19/00014/OAEA which will assist with accessibility to the train station and town centre. Alternative routes are available through Haysden Country Park for daylight hour. Other proportionate transport improvements could be secured via the delivery of the site, reducing reliance on private car. Furthermore, Redrow Homes are committed to delivering 100% EV charging to all houses across the site. Redrow Homes is also committed to delivering sustainable homes. Their model seeks to decarbonise operations and supply chains, improve energy efficiency, reduce the carbon footprint of products, services and processes, and set ambitious emissions reductions targets in line with climate science, and scale up investment in the development of innovative low-carbon products and services. Thus, the 15 homes delivered on this site will assist in reducing greenhouse gas emission. Therefore, the SA assessment of 0 should be changed to Significant Positive (++).</p> <p>SA13 – The SA concludes an uncertain minor negative impact due to the site's location in a Mineral Safeguarding Area. A small part of the Sandstone - Ashdown Formation mineral protection area is identified in the Kent County Council Mineral Safeguarding Maps. KCC Minerals and Waste Local Plan Policy DM7 sets out specific criteria that allow for development to come forward in the location. Evidence can be provided in relation to value of the mineral and viability of its extraction. However, this policy also sets out that material considerations indicate that the need for the development overrides the presumption for mineral safeguarding. In this case, TMBC need to seek sustainable locations to accommodate their housing need. As set out within our response to other SA objectives, this site represents a highly sustainable site adjacent to the urban area of the borough largest and best serviced town. Furthermore, the site is too small to enable mineral extraction. Therefore, it is considered that this site should be assessed as negligible (0).</p> <p>SA14 – The SA concluded that site ref 59764 would have a significant positive effect on supply of high quality housing however, site ref 59765 was considered to have an uncertain minor positive. The assessment of site ref 59764 is correct. The assessment of site 59765 should be updated to reflect this. Housing provision is evidently a</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		significant positive and this score should be changed to reflect that. There is no uncertainty about the ability of this site to deliver housing, in a range of sizes, types and tenures. The site is in the control of a housebuilder seeking to deliver the homes within the early years of the Plan Period via a full planning application. This application will be submitted at the earliest opportunity to assist with TMBC housing delivery. Furthermore, the withdrawn Reg19 SA conclude that "This site has the potential to deliver a substantial number of residential units in the long term. A portion of all units would include a range of affordable housing products on-site in line with the Councils Affordable Housing Policy. 25% of dwellings will provide enhanced accessibility or adaptability in order to meet a range of needs." Long term the site scored a Significant Positive. The same should be concluded now and consistency is required for the assessments of both site ref. 59764 and 59765."	
43629217	SA Report	<p>"2.3 Sustainability Appraisal</p> <p>2.3.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>2.3.2 The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.</p> <p>2.2.3 The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process. The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the SA should still clearly assess any reasonable alternatives and clearly articulate the results of any such assessment.</p> <p>2.3.4 The Interim SA examines the Council's approaches to housing delivery, and contrasts proposed policy requirements and strategies against defined reasonable alternatives to confirm that the strategy outlined represents an appropriate strategy. This includes an appraisal of reasonable site options."</p>	Noted.
43072865	SA Report	"The Local Plan evidence base includes an Interim Sustainability Appraisal Report (hereafter SA Report). The purpose of the SA Report is to consider the reasonable alternative development options in	SA is a desk-based, strategic assessment and all reasonable alternative development site options have been appraised on a 'policy-off' basis. This means they are appraised on their physical

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>relation to the strategic location and quantum of development to be delivered over the Plan Period; together with reporting findings of SA appraisals for each site submitted as part of the Call for Sites process.</p> <p>3.2 The SA Report establishes 14no. objectives against which each site is assessed. The SA acknowledges limitations to the Site Assessments at para 2.38 which includes:</p> <ul style="list-style-type: none"> - Some of the data available was based on reporting of the 2011 census- it recognises that data is now relatively old; - straight line distances were used to define areas within which varying levels of harm to environmental receptors were assumed to exist. In reality, the risk of harmful effects will sometimes depend on non-linear pathways (such as watercourses for water pollution effects) and will depend on the particular vulnerabilities of specific receptors; - Where site options are close to the borough boundary, the spatial analysis was potentially affected by the fact that some spatial data required for proximity-based assessments were not available for neighbouring districts, or for part of them; - The level of detail of the site options appraisal work was commensurate with the level of detail of the Local Plan document. As such, not every local characteristic could be investigated for each site option. For example, in relation to potential effects of the site options on biodiversity assets, it was necessary to base the identified effect on proximity to designated biodiversity sites only. - The available GIS data for agricultural land classification did not distinguish between Grade 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the scores. <p>3.3 The Site Submissions for the February 2022 Call for Sites had to be made through a consultation portal which only allowed the submission of basic information. As such, it was not possible to provide any details relating to the development proposals or any supporting technical work. This is clearly recognised as a limitation within the SA Report. The SA appraisal was therefore undertaken as a desk study without details of the proposals. For major sites the majority of the objectives considered by the SA appraisal would be addressed by the provision of facilities within the development. This would significantly affect the scoring.</p> <p>3.4 Finally, it is also not possible to assess the impact of development in relation to matters of heritage harm and impact upon biodiversity solely considering distance from protected sites. These matters need careful consideration taking account the detailed development proposals, intervening features and connectivity.</p> <p>3.5 The Site at Postern Quarry was submitted as part of the Call for Sites in February 2022 (Site reference 59834) and therefore has been considered as part of the Interim Sustainability Appraisal (hereafter SA) Report. The SA Appraisal does not provide an accurate assessment of the sustainability of the scheme in light of the detailed</p>	<p>constraints only and not their specific development proposals. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites).</p> <p>The SA does provide an assessment of the impact of development in relation to heritage (SA objective 7: heritage) and biodiversity (SA objective 5: biodiversity and geodiversity). However, the assessment is high-level and dependent on the evidence available. Further to this, some of the effects would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>The respondent's comments against most of the SA objectives relate to the specific development proposals for this site. As explained already, this is a 'policy-off' appraisal and so consideration is not given to these. If the site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 2: services and facilities is informed by the Urban Capacity Study (July 2022), which specifically explores levels of accessibility across the Borough.</p> <p>With regard to SA objective 7: heritage, the SA gives consideration to all heritage assets recorded in the Kent Historic Environment Record. It is therefore correct that the SA states the site is within 250m of heritage assets.</p> <p>With regard to SA objective 9: soil, the SA correctly acknowledges that the site comprises Grade 3 agricultural land. The significant negative effect is recorded as uncertain, as it is not known whether the Grade 3 agricultural land is 3a (high quality) or 3b (not classed as high quality).</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>development proposals. As such, the below is an updated SA Appraisal undertaken with reference to the development proposals.</p> <p>3.6 This submission is also supported by technical work; together with a Call for Sites document which detail the site specific proposals (included at Appendix 1).</p> <p>Objective Score Commentary</p> <p>1) To improve human health and well being</p> <p>Significant Positive (++) Agree with SA Appraisal</p> <p>2) to improve equality and access to community facilities and services</p> <p>Significant Positive (++) Site will deliver new open space, access to water sports and community facilities</p> <p>3) to improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Significant Positive (++) The Site proposes to deliver water based leisure activities, nature trails, forest school/nursery all of which would contribute to skills enhancement. The facilities would be open to use by local schools and clubs.</p> <p>4) to encourage sustainable economic growth, business</p> <p>Significant positive (++) / Minor Positive (+)</p> <p>Agree with SA Appraisal- site proposes the delivery of development and economic inclusion across the Borough commercial and employment uses</p> <p>5) to protect and enhance biodiversity and geodiversity</p> <p>Minor positive (+) Site is currently unmanaged and is the subject of an incomplete quarry restoration plan. The proposals would seek to improve and diversify habitat on site together with providing new areas of open space to reduce pressure on existing sites with ecological protection.</p> <p>6) to protect and enhance the Borough's landscape and townscape character and quality</p> <p>Significant positive (++) Site is located adjacent to the urban confines of Tonbridge. The existing land is not accessible to the public. The proposals seek to deliver a leisure led development with significant areas of open space, water environment and ecological areas which would all be publicly accessible.</p> <p>7) to protect and enhance the cultural heritage resource</p> <p>Negligible (0) SA Appraisal acknowledges that impact upon heritage assets is unknown. There are no heritage assets on the Site.</p> <p>The closest heritage assets are Listed Buildings located on Mill Lane, separated from the Site by the Cannon Lane Industrial Estate which is an intervening area of built development. Other Listed Buildings are located further away on Postern Lane and Stair Road, Hadlow. The proposals include significant areas of open space between the built development and these Listed Buildings which would negate any</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>impact upon their setting. 8) to protect and enhance the quality of water features and resources</p> <p>Negligible (0) / minor positive</p> <p>The development proposes engineering the land to raise the western element of the Site out of Flood Zones 2 and 3 and creating additional storage capacity to the east through the construction of lakes and a lock system into the river which would mitigate the development impacts. Flood risk would be managed and may be able to provide a lessening of flood risk locally.</p> <p>9) To conserve and enhance soil resources and guard against land contamination</p> <p>Likely effect uncertain (?) SA Appraisal acknowledges that the agricultural land classification is unknown. The land has formally been quarried and has not been restored in accordance with the approved restoration plan. As such, the quality of the agricultural land is questionable.</p> <p>10) to reduce greenhouse gas emissions so as to minimise climate change</p> <p>Minor positive (+) / significant positive (++)</p> <p>The Site is of a substantial size and could therefore accommodate new bus links, encouraging sustainable travel.</p> <p>It is also the intention of the development to create safe, walkable, well lit routes to and from Tonbridge to encourage walking and cycling.</p> <p>11) to improve adaption to climate change so as to minimise its impact</p> <p>Negligible (0) Agree with SA Appraisal.</p> <p>12) to protect and improve air quality</p> <p>Negligible (0) Agree with SA Appraisal; however, it is noted that in order to score positively a Site might need to be located in an AQMA and offer some form of benefit that would improve local air quality from the existing baseline whereas the Site at Postern Quarry is not affected by air quality issues.</p> <p>13) to protect material assets and minimise waste</p> <p>Significant positive (++) The Site is a former quarry and the majority of the mineral resource has been removed. There would therefore be no issue in relation to sterilising mineral resource.</p> <p>14) to provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>Significant positive (++) Given the size of the Postern Quarry Site it would be reasonable to assume a broad mix of types, sizes and tenure of homes including affordable homes.</p> <p>4.0 CONCLUSIONS</p>	

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		<p>4.1 Tonbridge and Malling Borough Council is undertaking consultation in relation to its Regulation 18 Local Plan. These Representations are made on behalf of Bowyers Field Developments Ltd which has an interest in the land at Postern Quarry, Postern Lane, Tonbridge.</p> <p>4.2 Bowyers Field Developments Ltd is supportive of the principle of the need for a Green Belt Review and Green Belt land release. It considers the best approach to accommodating growth is through dispersed site allocations in the major urban areas (the Medway Gap, Snodland, Kings Hill, Walderslade and Tonbridge) and Rural Service Centres across the two Housing Market Areas. In light of the Council's previous failure to maintain a 5-year housing land supply, the time it has taken to produce the new Local Plan and the need to release Green Belt land, the level of growth should be above the minimum requirement calculated utilising the Standard Method. This would positively plan for ongoing housing needs and limit the need for further Green Belt review.</p> <p>4.3 The Local Plan consultation is supported by an evidence base of documents including a Sustainability Appraisal (SA) for the Local Plan growth options and for Sites submitted through the previous Call for Sites exercise. These Representations are supported by further information in relation to the Postern Quarry Site Submission to allow the Council to better understand the development proposals to undertake a more specific and accurate SA.</p> <p>4.4 The Site at Postern Quarry proposes a leisure led development, incorporating water based uses together with significant areas of public open space, woodland, community uses and a new marina. These facilities would provide for a substantial increase in high quality publicly accessible open space which is currently inaccessible to the public, together with providing a whole host of water and leisure activities on the doorstep for Tonbridge residents. The residential element of the development is well located in relation to the shops, services and public transport links in Tonbridge. The Site would also provide new shops and facilities together with new walking and cycling routes connecting to Tonbridge. The Site should therefore score highly in relation to the positive impacts of the proposals in the SA and would have a limited impact upon the purposes of the Green Belt."</p>	
24986657	SA Report	<p>"Sustainability Appraisal.</p> <p>1. Treatment of climate change.</p> <p>Chapter 3 of the SA clearly outlines the importance of addressing Climate Change, indicates what is expected of a Local Plan in this regard, and what the implications are of not addressing this issue. The SA understands the relationship of all the objectives to achieving a holistic approach to adaptation and mitigation. The SA rightly indicates how important strong LP development management policies are for reducing the carbon footprint of the Borough and resisting any increase. However scoring the strategic and spatial options in any</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The SA contains references to TMBC's Climate Change Strategy in Appendices B (Review of Relevant Plans, Policies and Programmes) and C (Baseline Information). Further to this, the Council has commissioned evidence on this topic to support development of the Local Plan and this will feed into the baseline information contained within the next iteration of the SA.</p>

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		<p>depth is impossible without an up to date evidence base and detailed topic paper.</p> <p>The Borough has adopted a Climate Change Strategy. The local plans must reflect the aspirations and targets of this strategy. Parishes are producing their own strategies as encouraged and are supporting the Borough's own targets. The only way these targets can be met are if this Local plan reflects the need to build to zero carbon standards and take every opportunity to produce renewable energy either as part of development or off site to provide new infrastructures and district heating. Nothing has been done in producing an evidence base that identifies opportunities. Other Local authorities have and are grasping this 'nettle'. They are requiring building standards higher than building regulations. This Local Plan is to take us to 2040 it must be clear that the Borough will not accept new development that does not meet the highest standards. The opportunities for producing renewable energy should be properly investigated as this could be a major influence in where new development could be the most sustainable. The SA does not have this evidence base from which to test the strategic and spatial options and individual sites.</p> <p>Where are the current areas creating the biggest footprint? What would each choice of option have on them? Could it reduce it? Would it exacerbate it? Which are the locations where there are opportunities for increases in green infrastructure, biodiversity and natural solutions? Where are the opportunities for providing sources of renewable energy and district heating to both new and existing development? Which areas can cope with more development due to existing infrastructure capacity (Electricity and gas grid, waterbodies and different geology (for ground source), road network capacity, water and sewerage capacity). Which is more carbon costly- to upgrade existing infrastructures or build new? Huge areas need investigation before there can be full understanding of the impact of any chosen option on the carbon footprint in the Borough.</p> <p>Without a climate evidence base the SA is flawed.</p> <p>2. The Green Belt – lack of evidence base</p> <p>The SA of individual sites should have screened out sites in the Green Belt to determine what is available outside the Green Belt and how that impacts on emerging alternative spatial options. This would then have informed the 'exceptional circumstances study'.</p> <p>A joint Green Belt study across the 3 Boroughs involved in the 2 HMAs needs to have been undertaken to determine which areas of the Green Belt are most important, and which are least important when judged against the 5 purposes of the Green Belt as set out in the current NPPF. This should have been done with Tunbridge Wells and Sevenoaks at least before they submitted/submit their LPs and was called for by consultees at the previous T&M LP examination. This has not yet been done and without it is impossible to properly identify areas that could be released and qualify as 'exceptional circumstances'."</p>	<p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is an entire section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. For this reason, it is not the purpose of the SA to inform an 'exceptional circumstances study'. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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42380353	SA Report	<p>"COMMENTS ON THE SUSTAINABILITY APPRAISAL and ANNEX 1</p> <p>Sustainability Appraisal.</p> <p>* Treatment of climate change.</p> <p>Chapter 3 of the SA clearly outlines the importance of addressing Climate Change, indicates what is expected of a Local Plan in this regard, and what the implications are of not addressing this issue. The SA understands the relationship of all the objectives to achieving a holistic approach to adaptation and mitigation. The SA rightly indicates how important strong LP development management policies are for reducing the carbon footprint of the Borough and resisting any increase. However, scoring the strategic and spatial options in any depth is impossible without an up to date evidence base and detailed topic paper.</p> <p>The Borough has adopted a Climate Change Strategy. The local plans must reflect the aspirations and targets of this strategy. Shipbourne Parish Council has produced our own strategies are supporting the Borough's own targets. The only way these targets can be met are if this Local plan reflects the need to build to zero carbon standards and take every opportunity to produce renewable energy either as part of development or off site to provide new infrastructures and district heating. Nothing has been done in producing an evidence base that identifies opportunities. The opportunities for producing renewable energy should be properly investigated as this could be a major influence in where new development could be the most sustainable. Other Local authorities are requiring building standards higher than building regulations. It must be clear that the Borough will not accept new development that does not meet the highest standards. The SA does not have this evidence base on which to test the strategic and spatial options and individual sites.</p> <p>* Where are the current areas creating the biggest footprint?</p> <p>* What would each choice of option have on them? Could it reduce it? Would it exacerbate it?</p> <p>* Which are the locations where there are opportunities for increases in green infrastructure, biodiversity, and natural solutions?</p> <p>* Where are the opportunities for providing sources of renewable energy and district heating to both new and existing development?</p> <p>* Which areas can cope with more development due to existing infrastructure capacity (Electricity and gas grid, waterbodies, and different geology (for ground source), road network capacity, water and sewerage capacity).</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The SA contains references to TMBC's Climate Change Strategy in Appendices B (Review of Relevant Plans, Policies and Programmes) and C (Baseline Information).</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is an entire section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. For this reason, it is not the purpose of the SA to inform an 'exceptional circumstances study'. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>* Which is more carbon costly- to upgrade existing infrastructures or build new?</p> <p>Huge areas need investigation before there can be full understanding of the impact of any chosen option on the carbon footprint in the Borough.</p> <p>Without a climate evidence base the SA is flawed.</p> <p>* The Green Belt – lack of evidence base</p> <p>The SA of individual sites should have screened out sites in the Green Belt to determine what is available outside the Green Belt and how that impacts on emerging alternative spatial options. This would then have informed the ‘exceptional circumstances study’. (https://www.tmbc.gov.uk/downloads/file/2200/green-belt-study-exceptional-circumstances-strategic-note)</p> <p>A joint Green Belt study across the 3 Boroughs involved in the 2 HMAs needs to have been undertaken to determine which areas of the Green Belt are most important, and which are least important when judged against the 5 purposes of the Green Belt as set out in the current NPPF. This should have been done with Tunbridge Wells and Sevenoaks at least before they submitted/submit their LPs and was called for by consultees at the previous T&M LP examination. This has not yet been done and without it is impossible to properly identify areas that could be released and qualify as ‘exceptional circumstances.’"</p>	
44049057	SA Report	<p>"Comments on Specific Objectives</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>It is stated that the site is within 800m of an existing area of open space/walking and cycle path\play area\sports facility.</p> <p>The site will in fact destroy walking and cycle paths, and bridle paths and by-ways, in a large area of countryside that is protected green belt and contains vital farmland.</p> <p>The existing high volume of traffic on the local narrow lanes already means that walking and cycling are hazardous and unsafe.</p>	<p>Site 59811 receives a minor positive effect in relation to SA objective 1: health and wellbeing because, in line with the site assessment criteria, it is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both).</p> <p>The site is recorded as having a significant negative effect in relation to SA objective 2: services and facilities, as it falls within the Poor Accessibility Band.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown. This objective does not look at traffic congestion on local roads.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 2: To improve equality and access to community facilities and services.</p> <p>See comments above on lack of community facilities and public transport.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society.</p> <p>See comments above on lack of schools in immediate vicinity and lack of capacity in existing near-by schools.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity.</p> <p>'The site contains an existing green infrastructure asset that could be lost as a result of new development.'</p> <p>See comments above.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>As you are aware, the site is within 250m of a heritage asset, historic Oxenhoath, a grade II* listed house with driveway containing ancient trees, parkland and a walled garden. Its unique character and position should be preserved and safeguarded.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact.</p> <p>SA Objective 12: To protect and improve air quality.</p> <p>The provision of 2362 houses in an area that lacks local services and public transport suggests these will probably be two-car households and, with home deliveries, this could result in around 5,000 additional vehicle using the lanes, with consequent negative impact on air quality and climate change.</p>	<p>Site 59811 contains Ancient Woodland, in addition to green infrastructure assets. Therefore, it correctly receives an uncertain significant negative effect in relation to SA objective 5.</p> <p>Site 59811 is expected to have a significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59811 is not within 100m of an AQMA.</p> <p>The SA is too high-level to consider water supply, although information on water supply is provided in the baseline information (Appendix C of the Interim SA Report).</p> <p>With regard to SA objective 14: housing, the site receives a significant positive effect because it will deliver a significant number of new homes. The SA acknowledges under SA objective 2: services and facilities that the site falls within the Poor Accessibility Band. For this reason, the site receives a significant negative effect in relation to SA2. The SA also acknowledges that the site is more than 800m from a railway station and more than 400m from a bus stop and cycle route. Therefore, it receives a minor negative effect in relation to SA objective 10: climate change mitigation.</p> <p>The site assessment criteria do not take into consideration Broadband because this is a very localised issue, the status of which can change very quickly. The Government has several programmes in place with the aim to increase speeds and access to Broadband for homes and businesses, and it is likely Broadband connectivity will change very rapidly in a number of areas over the Plan period. It is not within the scope of the SA to consider mobile phone signal.</p>

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		<p>Climate change is already affecting our water supply and this summer we were left without water on a number of occasions. If the existing water supply is already unable to meet local demand, it is not going to be possible to provide water to an additional 2362 homes.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The provision of affordable housing is seen as a significant positive in the proposal, but for anyone who is struggling financially it is impracticable to provide affordable housing in an area that lacks both local facilities and public transport.</p> <p>Finally, consideration also needs to be given to the very poor local internet connection and lack of mobile phone signal in much of this area, with old fashioned telephone lines at risk of being brought down by falling trees every time there is a storm. Much of the area also does not have access to gas."</p>	
25333345	SA Report	<p>"Surface Water Quality It is encouraging to see the inclusion of Sustainability Appraisal Objective 8 in the Interim Sustainability Appraisal Report, "To protect and enhance the quality of water features and resources". Although the heading and main points in this section have correctly identified that the quality of our water bodies should be protected and enhanced, this objective should go further in clearly stating what the problems are with water quality. In the context of this objective, what is meant by water quality? Who is responsible for ensuring these problems are addressed?</p> <p>Objective 11 that deals with adaptation to climate change is another important but has not gone far enough in identifying the main problems and solutions, especially when dealing with water quality. Objectives 8 and 11 should identify the links between water quality and our changing climate."</p>	<p>Appendix C provides the baseline information for Tonbridge and Malling, the purpose of which is to identify the key sustainability issues affecting the borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed.</p> <p>The SA objectives which comprise the SA framework should be concise and focus on outcomes, which in the instance of SA objective 8 is "To protect and enhance the quality of water features and resources". Further information on what is meant by water quality is outlined in the baseline information, which contains an entire section dedicated to the borough's water environment.</p> <p>As set out in Chapter 6 of the Interim SA Report, the SEA Regulations require that "the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action" and that the environmental report should provide information on "a description of the measures envisaged concerning monitoring". Chapter 6 provides indicators for monitoring significant sustainability effects that may give rise to irreversible damage.</p> <p>In terms of climate change, again the baseline information in Appendix C is used to identify key sustainability issues affecting the borough, and these inform the SA framework. It is not the role of the SA objective to identify problems and solutions, rather it is used as a framework for appraising each aspect of the Local Plan. As mentioned already, SA objectives should be concise and focus on outcomes.</p>

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42684641	SA Report	<p>"Table 4.2</p> <p>Option 1 points 5 to 13 would all be positive not a question mark. This is misleading to state otherwise."</p>	<p>Due to the high-level nature of SA and the Spatial Options, and the fact the exact location of development is unknown, uncertainty has been added to some of the effects.</p>
42684641	SA Report	<p>Chapter 6 [Monitoring] If you want to keep these objectives you won't with the choices north of Hadlow and Mereworth.</p>	<p>The SA objectives provide a framework against which the effects of the Local Plan will be assessed. The SA objectives and sub-objectives act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.</p> <p>The SA is one of many factors that feed into the plan-making process.</p>
44274145	SA Report	<p>"SA Objective 1: To improve human health and well-being</p> <p>The analysis identifies that site 59707 provides a minor positive contribution to this objective. This is agreed with; the site is located adjacent to the existing limits to built development of Wrotham and is suitably placed to provide access to healthcare and is well served by footpaths. The site has the opportunity to provide open space within it as part of any scheme, and as identified by the indicative concept drawing in Figure 1.</p> <p>Figure 1 Indicative layout concept drawing</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>The analysis considers that site 59707 is within the Fair Accessibility Band, which is understood to mean that some accessibility to facilities and services exist. It is therefore disputed that this would create a minor negative impact. Wrotham is a well serviced village with a wide range of amenities. It has a church, village hall, three pubs, village shop, doctors, hairdressers, mobile library as well as having its own primary school and two secondary schools. These are all accessible by the site.</p> <p>Wrotham is one mile north of Borough Green and its connecting services, and 5 miles east of Sevenoaks with its wider range of extensive amenities.</p> <p>Wrotham is highly accessible by public transport; with 16 bus routes stopping in the village, making access to Maidstone, Tonbridge, Tunbridge Wells, Sevenoaks and Gravesend with intervening stops in between, easy for the village occupants. Wrotham is well placed for transport links given its proximity to the M20, M25, A20 junctions and their corresponding link roads. It is therefore considered that the summary should be changed to a positive at the very least.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>It is understood that because of uncertainties around school capacity, the significant positive of being within 800m of an existing primary and secondary school is classed as 'uncertain'. Whilst this perception is understood, it is strongly put forward that capacity is an issue</p>	<p>Support noted with regards to the effect site 59707 is expected to have in relation to SA objective 1: health and wellbeing. In terms of the indicative layout concept drawing provided by the respondent, this is a 'policy-off' appraisal and so consideration is not yet given to mitigation (e.g. provision of open space). In other words, each reasonable alternative development site option is appraised on its physical constraints only so as to ensure all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59707 has been appraised in accordance with the site assessment criteria (Appendix D of the Interim SA Report), and so has correctly been given a minor negative effect against SA objective 2: services and facilities.</p> <p>With regard to SA objective 3: education, all sites that are recorded as falling within close proximity of a school receive uncertainty, as school capacity is unknown. Site 59707 is recorded as having a significant positive effect in relation to SA objective 3, albeit uncertain.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities rather than access to employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 6: landscape and townscape, the proforma incorrectly states that the site is not located near any settlements when it is in fact on the edge of a settlement. This is due to the fact the GIS analysis identified some sites as not located near any settlements when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. In the next iteration of the SA Report, this will be corrected. However, the site will still receive an uncertain significant negative effect as it is within the AONB.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>borough wide, so the consideration that education facilities are so close should be given much greater weight</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>The analysis sets out that “the location of residential sites will not directly influence sustainable economic growth or the delivery of development opportunities.” This statement is disagreed with. The ability to provide residential development, such as at site 59707 in close proximity to a wide range of services, being in a highly accessible, will provide the workforce and opportunities to provide and support business development. Providing a residential development on the edge of a village will also ensure that economic growth and the influx of people to support growth is not just concentrated within urban areas.</p> <p>Paragraph 79 of the NPPF sets out that “housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” It is inherently inclusive and sustainable to link the provision of housing and economic growth, as the people who reside within the allocated housing development will, in the vast majority, require places of work and local areas within the vicinity to spend their earnings.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>The analysis of this objective is agreed with, in part. Although the site may be within proximity to designated sites, this does not mean that mitigation, biodiversity net gain and enhancements cannot be provided and designed within an scheme. It is recognised that the analysis identifies this, but it is put forward that this therefore cannot be counted as a negative.</p> <p>SA Objective 6: To protect and enhance the borough’s landscape and townscape character and quality</p> <p>The analysis sets out that the site “is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces.” This is wholly inaccurate. Site 59707 is located immediately adjacent to the settlement of Wrotham in a rural location, as shown in Figures 2 and 3. It is not currently designated as open space. It cannot therefore be said that the site would result in the loss of a designated open space, or that it is not located near any settlements.”</p>	
44274145	SA Report	<p>"The comments regarding the potential effects of the proposed residential development at the site as being uncertain are agreed with, in part. When considering the suitability of the site in respect of the landscape designation of the Kent Downs AONB, it is put forward that site 59707 is a more favourable site for allocation to meet the Council's housing requirement than other sites in the locality which are more prominent in their landscape position. The proposed development would be designed to be of a scale and layout to</p>	<p>The SA uses 500m as a threshold for determining effects on the AONB. Site 59707 is located within 500m of the AONB and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>mitigate any potential effects on the landscape. The indicative layout illustrations demonstrate how this could be achieved. It is put forward that if the effects are uncertain and can be mitigated by the design, this cannot now be considered as a significant negative. The proposed residential developments design put forward will be lead by a Landscape and Visual Impact Assessment to ensure that the proposal will not negatively impact the landscape, with suitable mitigation proposed and provided should this be necessary.</p> <p>Figure 4 - Illustrative concept aerial view</p> <p>Figure 5 - Illustrative 3D concept, looking from Wrotham to the south west</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>The analysis identifies that the site is located within 250m of a designated heritage asset and that the potential effects of this are uncertain at this early stage. This is agreed with, but it is put forward again that if the effects are unknown, then this cannot be designated as a significant negative at this early stage. The proposed residential development will be lead and accompanied by a Heritage Statement, which will be included within the overall designing and layout output process to ensure that heritage assets will not be negatively impacted upon.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>The analysis of this objective is disagreed with. The analysis output states that the "site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with 1 in 30 year risk of surface water flooding." As can be seen from Figure 6, the site is not located within a flood risk zone.</p> <p>Figure 6 Flood map for planning extract</p> <p>Figure 7 Surface water flood map</p> <p>It does appear that part of the site is at low to medium risk from surface water flooding. However, this does not preclude residential development. Any application for a residential development would include a sustainable drainage strategy and flood risk assessment, ensuring that any proposal would not increase the flood risk elsewhere. It is surmised that the SUDS design could be used to improve any potential risks from surface water for underlying topography whilst incorporating Biodiversity Net Gain.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>The analysis sets out that the site is greenfield and contains a significant proportion of Grade 1 or 2 agricultural land. When consulting the Natural England Defra online mapping resource, the land is identified as being Grade 2. The allocation of the proposal site for housing would not alter the Council's ability to conserve and enhance soil resources, as it would not alter the value of the soil. The provision of housing on the land would ensure that Grade 2</p>	<p>'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>With regard to SA objective 7: heritage, the SA utilises a precautionary approach. As the site contains a heritage asset (Outfarm south of Town House), as recorded in the Kent Historic Environment Record, and is adjacent to a Conservation Area containing numerous other heritage assets, the significant negative effect is considered appropriate. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. As stated in the proforma "The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added]. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. SuDS). This ensures all sites are appraised consistency.</p> <p>With regard to SA objective 9: soils, development of the site would result in the loss of best and most versatile agricultural land. For this reason, the site is expected to have a significant negative effect in relation to this objective.</p> <p>Support noted with regards to the effect site 59707 is expected to have in relation to SA objective 10: climate change mitigation. The site receives this minor positive effect, as it is within 400m of at least one bus stop.</p> <p>With regard to SA objective 11, this objective relates to climate change adaptation, not climate change mitigation as identified under SA objective 10. Climate change adaptation is how we respond to climate change, such as through the inclusion of SuDS and the use of materials which withstand climate change impacts (e.g. extreme heat). Things like access to services and facilities helps mitigate the effects of climate change, not adapt to the effects of climate change.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59707 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, a negligible effect is correct as the site not falling within a Minerals Safeguarding Area does not change anything.</p> <p>Support noted with regards to the effect site 59707 is expected to have in relation to SA objective 14: housing.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>agricultural land is actually not depleted in quality as a resource. Furthermore, the extent of land in the applicant's ownership that it si considered unviable in supporting an agricultural enterprise given its limited size and proximity to the built settlement.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>The analysis completed for this objective, as a positive is agreed with. The proposal site is situated within a well serviced village with a wide range of amenities. It has a church, village hall, three pubs, village shop, doctors, hairdressers, mobile library as well as having its own primary school and two secondary schools.</p> <p>Wrotham is one mile north of Borough Green and its connecting services, and 5 miles east of Sevenoaks with its wider range of extensive amenities. Wrotham is also highly accessible by public transport; with 16 bus routes stopping in the village, making access to Maidstone, Tonbridge, Tunbridge Wells, Sevenoaks and Gravesend with intervening stops in between, easy for the village occupants. Wrotham is well placed for transport links given its proximity to the M20, M25, A20 junctions and their corresponding link roads.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>The overall analysis for this objective is not understood. The location of a development will directly impact how sustainable it is, which in turn has a direct bearing upon the ability to minimise the impacts of climatic change. The provision of services close by, which are accessible by foot or by public transport reduces the reliance upon a car. At a high level, this will contribute to the ability to adapt to climate change, as it will promote more environmentally friendly living practices. The proposed residential development at site 59707 will be designed in a way to include sustainable living practices, utilising renewable energy technologies, water and energy efficiency whilst also utilising sustainable construction materials and methodology. This will comply with the objective.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>The analysis of negligible is a disagreed with; the sustainable location of site 59707 will reduce emissions which will in turn protect air quality in the area.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>The analysis of negligible is again disagreed with. If site 59707 is not located in a mineral safeguarding area, then this is a positive contribution to this objective. Should housing be proposed in a mineral safeguarding area, then there is the potential for mineral extraction reduction due to the construction of housing. As site 59707 is not in a mineral safeguarding area, there will be no restrictions.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		The analytical outcome of this objective is endorsed. Site 59707 would provide the opportunity to deliver a high-quality housing development of between 100 and 130 homes, with green space, sustainable drainage systems and biodiversity net gain. This would include an appropriate mix of sizes, types and tenures."	
44275681	SA Report	<p>"The Assessment of the Quantum Options</p> <p>Whilst we note that the SA acknowledges at para 4.5 that 'the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative', and agree with that statement; we are, as set out above, somewhat confused as to whether the SA has in fact tested the effects of delivering the LHN figure + 10% or a supply that is 10% above the HLN which is a different scenario.</p> <p>With the above in mind, we fail to see why table 4.1 suggests that Option 1 (LHN) scores a minor positive for objectives 1, 2 and 3, yet Option 2 (LHN+10%) scores a mixed minor effect for all three. Option 2 in providing more housing has the ability to help to address the issue of affordability and thus improve the health and well-being of those in housing need, especially the homeless (SA objective 1). Para 4.6 appears to totally ignore the issue of affordability and its effects on health or indeed the fact that housing actively contributes to the delivery of health services. Likewise Option 2 has the greater ability to improve equality and access to community facilities and services (SA objective 2) than Option 1, given its ability to address the issue of homelessness and affordability which we note is a sub objective of objective 2 according to p70 of the SA. Furthermore, Option 2 would definitely help address the need to provide a suitable supply of high quality housing, including an appropriate mix of sizes, types and tenures (SA objective 14). Why Option 2 scores a significant positive (likely effect uncertainty) when Option 1 also scores a significant positive is truly bizarre. Whilst we note that para 4.9 of the SA suggests that the scale of housing delivery associated with Option 2 is 'in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study', and that as a result there is 'uncertainty attached to this option as there is a question mark around its deliverability'; this is not in our opinion a reason for the SA to reduce the score attributed to Option 2. Deliverability is an issue for the planning authority in determining the spatial strategy – not the SA. To this end we note that the Housing Market Delivery Study (HMDS) examines past delivery rates and uses these to make assumptions as to the capacity of the area to deliver homes in the future. Whilst helpful to understand the rate at which homes have been delivered in the past, we would argue against whether this should be used as an indication of future delivery rates. The ability of an area to support housing growth will relate principally to the range of sites allocated through the chosen spatial strategy rather than an innate capacity in the market as to the amount of growth that can be achieved. The Council should not be seeking to limit growth on the basis of what has been achieved in the past.</p>	<p>The quantum options subject to SA were identified by TMBC. It is reasonable, as a starting point, for one quantum option to be the assessed need generated by the Government's standard method. Quantum Option 2 is the assessed need + up to 10% therefore providing a buffer.</p> <p>The reasoning behind the effects each Quantum Option is expected to have is outlined in paragraphs 4.6 to 4.10 of the full Interim SA Report. Quantum Option 2 receives minor negative effects (as part of a mixed minor effect) against SA objectives 1: health and wellbeing, 2: services and facilities, and 3: education because as explained in the report, delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities, services and facilities, and schools. However, the Interim SA Report also acknowledges that the extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities.</p> <p>We note that there is some crossover between the SA objectives and although the delivery of affordable housing will have beneficial effects on health and wellbeing, housing delivery (including affordable housing delivery) is addressed separately under SA objective 14: housing. Quantum Options 1 and 2 will both provide a significant amount of new housing and therefore both receive a significant positive effect in relation to SA objective 14. In terms of Quantum Option 2 delivering more housing than Quantum Option 1, the SA acknowledges in paragraph 4.9 that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents" [emphasis added].</p> <p>Although the significant positive effect for Quantum Option 2 against SA objective 14 is recorded as uncertain, this is not a reduction to its score as suggested by the respondent. The SA states in paragraph 4.9 (see above quote) that Quantum Option 2 has a particularly significant positive effect. The reasoning behind the uncertain effect is appropriate.</p> <p>It is important to note that although Quantum Option 2 receives minor negative effects in relation to SA objectives 1, 2 and 3, it also receives minor positive effects. The fact Quantum Option 2 will help in the delivery of affordable housing is acknowledged in the SA. In the next iteration of the SA Report, the sub-objective "To tackle</p>

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		<p>The Assessment of the Spatial Options Reviewing table 4.2 spatial Option 3 (Development focused on sites within as well as adjacent to defined urban and Rural Service Centre settlements) appears to attain the most positive scores, with equal top scores in respect of SA objectives 1, 2, 3, 4, 5, 7, 8, 10, 11, 12, 13 and 14, and second equal on SA objectives 6 and 9. On this basis it would appear to us to be the option that most closely meets the SA objectives, and it is surprising that the SA does not actually say this explicitly.</p> <p>In addition to the above we are, we have to say, somewhat perplexed as to how spatial Option 1 scores so highly on SA objective 2 (to improve equality and access to community facilities and services) when, by directing most growth towards the northern part of the Borough it will not address the affordability issues in the southern part of the Borough, which given the southern part of the Borough's location within the WKHMA and thus the amalgam of the 3 least affordable Boroughs/ district in the county, would suggest anything that directs growth away from this area should obtain a much lower score. To this end we note that para 4.18 of the SA highlights the fact that there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis within the HMA's and that a sustainable pattern of development should seek to address the need where it arises, i.e. within each HMA. Spatial Option 1 simply would not do this and would exacerbate the affordability issue within the southwestern part of the Borough, where it is at its most acute.</p> <p>With regard to the Future Options of Tonbridge, Section 11 of the NPPF requires planning policies to promote an effective use of land in meeting the need for homes and other uses and paragraph 124 sets out key considerations that should be taken in this regard. Furthermore, NPPF paragraph 125 states: "plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination" It then follows that, the optimisation of densities on development sites within Tonbridge (Option 1) is recognised on the basis that the best use of previously developed land clearly scores well in SA terms.</p> <p>However, this does not mean that a brownfield alone approach should be taken given that an insufficient amount of sites within the urban area have been identified to accommodate the growth within the Urban Capacity Study and notwithstanding the complexities that can arise with brownfield sites that can affect delivery rates. It is essential that a sufficient amount and variety of land can come forward where it is needed in accordance with NPPF paragraph 60. It should also be noted that the delivery of Brownfield land can be longer due to the risks of complications during construction given the nature of the previous use. Therefore, to ensure the delivery of the housing need within the first five years of the plan period, it is essential that Greenfield land is also allocated and optimised. Thus, aspects of Option 2 can be deemed sustainable, notably where high quality and deliverable development results."</p>	<p>homelessness more effectively" will be moved to underneath SA objective 14: housing.</p> <p>Spatial Option 3 does perform very strongly in relation to the SA objectives compared to the other options, as does Spatial Option 2. It is important to note that SA is a high-level tool used to identify the likely sustainability effects of a Local Plan, and is one of many factors that feed into the plan-making process.</p> <p>Affordability is not addressed under SA objective 2: services and facilities, and is instead addressed under SA objective 14: housing. Affordability is an issue across the Borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
44304385	SA Report	<p>"59424 Clearheart Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The local environment has limited community facilities. The community centre is inadequate for the current population and further competition would result in decreased availability for existing service users. The sports park is largely football (a new rugby pitch has been built, but not used significantly to-date, raising concerns about its viability) with four tennis courts, two of which have been permanently assigned to a single tennis club, limiting availability for ad-hoc hirers. The status of facilities, all being leased from one of the parties developing the site, means that there is potentially no long-term benefit to the community of the significant S.106 investments raising further concerns about long-term viability.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area,</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>The site assessment criteria for SA objective 2: services and facilities consider the accessibility band that each site has been placed within in the Urban Capacity Study (July 2022), as this provides an indication of the overall accessibility of a site in relation to access to services and site location. Site 59424 falls within the Good Accessibility Band and therefore receives a negligible effect in relation to SA objective 2.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as being within a settlement when it is on the edge of a settlement. This is as a result of the GIS analysis identifying a high percentage overlap between the site and settlement boundaries. In the next iteration of the SA, this site will receive an uncertain minor negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>The site is a major wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Negative (-)</p>	<p>With regard to SA objectives 7: heritage and 8: water, respondent has not expressed any disagreement over the effects given.</p> <p>SA objective 9: soil considers whether a site is greenfield or brownfield, in addition to the Agricultural Land Classification. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. Priority Habitats are not specifically considered in the SA but almost all Priority Habitats in the Borough are covered by the green infrastructure assets layer under SA5. The site receives a minor negative effect in relation to SA objective 9 because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, site 59424 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59424.</p> <p>With regard to SA objective 14: housing, this deals with housing delivery only. Ancient woodland is considered separately under SA objective 5 (see above). The SA does not give consideration to TPOs.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>This site is located outside a settlement. The boundaries of the settlement were sold off separately by MOD to protect the surrounding countryside and concentrate development on the brownfield land.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land. The area is registered by DEFRA as 'Priority Habitat Inventory - Deciduous Woodland (England)'. Site contains Ancient Woodland and TPO protected trees.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Major negative (--)</p>	

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		<p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negative (-)</p> <p>The Site is an area of woodland surrounding the existing development. This provides a green lung for the area, and helps prevent some of the worst excesses of temperature on hot days; it is well documented that trees have a cooling effect on the environment and that is evidenced when walking around Kings Hill on a hot day in Summer, where a walker will experience a wall of heat when re-entering the village from the surrounding woodland.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the secondary access has been determined to be via the Teston Road, for which the primary access to the trunk road network is likely to be through Wateringbury. The addition of houses with access along the Wateringbury Road is likely to increase the number of vehicles turning right at the A26 / Red Hill traffic lights, which will significantly impact the throughput of the junction and the increase in pollution in that area. In addition, the main access road would be through a quiet residential cul-de-sac which already has significant parking problems, resulting in potential issues with access."</p> <p>"SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain positive (+)</p> <p>The site is initially expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, this would be at the expense of destruction of Ancient Woodland, and mature trees that are subject to TPO; previous estimates of housing densities for this site are below 100 dwellings and hence the value is uncertain.</p> <p>"* The proposed development is not exceptionally justified, and the compensation/ mitigation measures cannot re-establish or enhance the nature features that will be lost. As such the development is contrary to the requirements of Policy NE2.</p>	
44304385	SA Report	<p>59531Tower View SE</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of the site may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a minor negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objectives 6: biodiversity and geodiversity, 7: heritage, 8: water, 9: soil, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, site 59531 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59531 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

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		<p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p>	

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		<p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p>	
44304385	SA Report	<p>59534 Tower View NW</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>"The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of site 59534 may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59534 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a minor negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This</p>

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		<p>available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p> <p>.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p>	<p>would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objectives 6: landscape and townscape, 7: heritage, 9: soil, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p> <p>With regard to SA objective 8: water, site 59534 receives a mixed minor negative and negligible effect because although it does not contain a water body or watercourse or fall within a Source Protection Zone, it contains land with a 1 in 100 year risk of surface water flooding.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, site 59534 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59534 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p>	

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		<p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p>	

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44304385	SA Report	<p>59544 Cellini Walk</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health."</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Site 59544 does not contain open space and so is not recorded as containing open space in its proforma..</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59544 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a minor negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59544 is recorded as having a negligible effect as it is located within a settlement. Biodiversity and geodiversity sites are dealt with separately under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 7: heritage, the boundary of site 59544 has been drawn so as to avoid the heritage asset at its centre. However, the SA still record the site as having a significant negative effect as it is within 250m of this heritage asset. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>"SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p>	<p>whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59544 receives a mixed minor negative and negligible effect because although it does not contain a water body or watercourse or fall within a Source Protection Zone, it contains land with a 1 in 100 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, the site receives a minor negative effect because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land. Biodiversity is dealt with separately under SA objective 5, which gives consideration to locally designated sites.</p> <p>With regard to SA objective 10: climate change mitigation, the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objectives 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effect given.</p> <p>With regard to SA objective 12: air quality, site 59544 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59544 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negligible (0)</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is a conservation area that contains a less than significant proportion ($< 25\%$) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (-)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, the conservation area currently contributes to the improvement of air quality in the area.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p>	
44304385	SA Report	<p>59547 Discovery Drive</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of site 59547 may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59547 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p>	<p>of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59547 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development. Biodiversity and geodiversity sites are dealt with separately under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 7: heritage, site 59547 does not contain a heritage asset. However, as it is located within 250m of a heritage asset, it receives an uncertain significant negative effect in relation to this objective.</p> <p>With regard to SA objectives 8: water, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p> <p>With regard to SA objective 9: soil, the site receives a minor negative effect because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land. Biodiversity is dealt with separately under SA objective 5, which gives consideration to locally designated sites.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p> <p>.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1."</p> <p>"The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p>	<p>Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, site 59547 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59547 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negative (-)</p> <p>The site is a conservation area that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, the conservation area currently contributes to the improvement of air quality in the area.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p>	
44304385	SA Report	<p>59634 Hoath Wood</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant Negative (--)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>Also, the KCC Strategic plans for cycle connectivity included a cycle route directly through the middle of this site, and this would be lost if the development proceeded.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Sites 59634 and 59655 have been appraised in accordance with the site assessment criteria.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network and flooding. Flooding is considered separately under SA objective 8: water. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59634 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor negative effect in relation to this objective. Site 59655 has also been appraised in accordance with the site assessment criteria and correctly receives a minor positive effect.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site is placed within the Fair Accessibility Band. However, access would either need to be via the quiet lanes to the North of Kings Hill, or through the public open space that is currently used for soak-aways for the Kings Hill road network potentially resulting in more frequent flooding of the roads on Kings Hill.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>T</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites.</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, sites 59634 and 59655 are both recorded as having a significant negative effect. This is due to the fact both sites contain some Ancient Woodland and green infrastructure assets. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59634 is recorded as having a minor negative effect as it is located on the edge of a settlement. The effect is uncertain, as the actual effect is dependent on the final design, scale and layout of development. Site 59655 is incorrectly recorded as having an uncertain minor negative effect in relation to this objective, as it is not on the edge of a settlement but rather not located near any settlement in a rural location. In the next iteration of the SA Report, the site will have an uncertain significant negative effect. The SA gives all sites that are within 500m of the AONB a significant negative (--?) effect, in recognition of the potential for development outside of, but near to the AONB, to have an effect. Site 59634 is not within 500m of the AONB. The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to identify which sites are actually visible from an AONB. All sites have been appraised consistently using the same buffer distance.</p> <p>With regard to SA objective 7: heritage, 8: water, 13: material assets and waste, respondent has not expressed any disagreement over the effects given for both sites.</p> <p>With regard to SA objective 9: soil, site 59634 is incorrectly recorded as comprising brownfield land and so receives a significant positive effect in relation to this objective. In the next iteration of the SA Report, the site will receive a significant negative effect as it mainly comprises greenfield land, and Grade 2 agricultural land. Site 59655 receives a significant negative effect, as it is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2:</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site contains an existing green infrastructure asset that would be lost as a result of new development; much of the site is Ancient Woodland, and is bordered by more ancient woodland to the West. In addition, the site provides a wildlife corridor from the Warren Wood nature park and the ancient woodland to the North of Amber Lane through Warren Wood Ancient Woodland to Coalpit Wood Ancient Woodland. The effect of development would be devastating to the biodiversity in the area.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The site would be visible from the AONB of the North Downs and from points along the North Downs Way public footpath, reducing the character of the views. In addition, the development of the site would significantly and detrimentally change the vista from existing dwellings along the North edge of Kings Hill and many other dwellings with visibility in that direction.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--) /Negligible (0)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p>	<p>services and facilities. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas for both sites that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, sites 59634 and 59655 have been appraised in line with the site assessment criteria. As neither site is within 100m of an AQMA, both receive a negligible effect.</p> <p>With regard to SA objective 14: housing, sites 59634 and 59655 have been appraised in line with the site assessment criteria. As both sites have the potential to provide 100 dwellings or more, each receives a significant positive effect. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>Much of the site is Ancient Woodland. Most of the rest of the site is Grade 2 agricultural land. Although there was a small historic single storage location in its centre, that does not provide any justification for considering the site as a whole as brownfield.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The destruction of a significant area of ancient woodland would reduce the capacity of the area to absorb Carbon Dioxide from the air. Even if the trees were replaced, it would be several decades before the level of absorption would reach the level provided by the trees that are there at present.."</p> <p>"SA Objective 12: To protect and improve air quality</p> <p>Uncertain Negative (-?)</p>	

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		<p>The site is not within 100m of an AQMA. However, any access to the North would be via quiet lanes, and road traffic would impact on the safety and air quality of those lanes for recreational users.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain minor positive (+?)</p> <p>Although the site is expected to comprise 100 dwellings or more, that would be dependent on the destruction of a significant area of ancient woodland. If the ancient woodland was avoided, the number of dwellings would be much less than 100, and there would be restrictions in the mix of sizes, types and tenures.</p> <p>59655 Teston Road</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negative (-)</p> <p>The site is located in a poor accessibility band. The primary access is via the Teston Road and either via Watringbury Road through East Malling or Red Hill via the Watringbury traffic lights, both of which have traffic issues.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The site is greenfield in a Green Belt area.</p> <p>The site provides an open wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important link would result in the deterioration of both sites.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain Negative (-?)</p> <p>The site is located outside of a settlement. One of the few public footpaths and public roads skirts the site and are used for recreation; development will significantly impact the visual amenity of what is currently a rural vista.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)/Uncertain Negative (-?)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site does not contain a water body or watercourse but falls within or partially within Source Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use. Primary access is expected to be via the Teston Road, and from there either via East Malling or Watlingbury, either of which will result in additional traffic issues for those areas</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the increase of traffic on the Watringbury Road associated with this development will impact the AQMAs on the A20 and at the Watringbury traffic lights</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, the site is not sustainable, given the transport links and access to a service centre, and hence the practicability of the site is in question.</p>	
44304385	SA Report	<p>59884 Tower View NE</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of site 59884 may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect). The respondent has not expressed any disagreement over the effect given for site 59752 against this objective.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59884 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective. Site 59752 has also been appraised</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p>	<p>in accordance with the site assessment criteria and it correctly receives a minor negative effect against this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relates more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59884 and 59752 are recorded as having minor negative and significant negative effects, respectively. Site 59752 receives a significant negative effect because it contains some Ancient Woodland and green infrastructure assets. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59884 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development. Site 59752 is recorded as having an uncertain minor negative effect as it adjoins a settlement and so may be more easily integrated into existing built development.</p> <p>Site 59752 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets, including Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard tor SA objective 8: water, site 59752 receives an uncertain significant negative effect, as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p>

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		<p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development."</p> <p>"SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p>	<p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, sites 59884 and 59752 have been appraised in line with the site assessment criteria. As neither site is within 100m of an AQMA, both receive a negligible effect.</p> <p>With regard to SA objective 14: housing, sites 59884 and 59752 have been appraised in line with the site assessment criteria. As site 59884 has the potential to provide fewer than 100 dwellings, it receives a minor positive effect. As site 59752 has the potential to provide 100 dwellings or more, it receives a significant positive effect.</p> <p>With regard to SA objectives 7: heritage, 8: water, 9: soil, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59884.</p> <p>With regard to SA objectives 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59752.</p> <p>Respondent notes that sites 59755, 59758, 59759 and 59760 are in the Green Belt. However, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA has provided an appraisal of five Spatial Options in Chapter 4 for the distribution of development, all of which are high-level with no specific reference given to certain sites.</p>

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		<p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p>	

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		<p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p> <p>Downs and Mereworth</p> <p>59752 East of A228 South of Lapins Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling</p>	

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		<p>is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p>	

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		<p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p>	

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		<p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p>	

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		<p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.</p> <p>59755 Seven Mile Lane</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59758 North of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59759North of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59760South of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	
44304385	SA Report	<p>"59761 Kate Reed Wood</p> <p>SA Objective 1: To improve human health and well-being</p>	<p>With regard to SA objective 1: health and wellbeing, sites 59761 and 59630 receive mixed uncertain significant negative and minor positive effects. The uncertain significant negative effects are due to the fact both sites contains open space, which could be lost as a result of development although this is uncertain.</p>

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		<p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Mallings is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p>	<p>SA objective 2: services and facilities relates to accessibility, rather than the road network. AQMAs are dealt with separately under SA objective 12: air quality. Therefore, site 59761 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor negative effect in relation to this objective. Site 59630 has also been appraised correctly in that it receives a significant negative effect in relation to this objective. In terms of access to site 59630, the SA is too high-level to give consideration to site-specific access points. This is something that will instead be determined at planning application stage, if the site is allocated.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59761 and 59630 are recorded as having significant negative effects. This is due to the fact site 59761 contains some Ancient Woodland and green infrastructure assets, and site 59630 contains a green infrastructure asset and is adjacent to some Ancient Woodland. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59761 and 59630 are recorded as having significant negative effects because although they are located on the edge of a settlement, both contain open space that could be lost as a result of development.</p> <p>Site 59761 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development,</p>

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		<p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p>	<p>and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Sites 59761 and 59630 receive negligible effects in relation to SA objective 8: water, as neither is at risk of flooding or contains a water body or watercourse, or falls within a Source Protection Zone.</p> <p>With regard to SA objective 9: soil, both sites receive a minor negative effect, as they are greenfield land and contain a less than significant proportion of Grade 1, 2 or 3 agricultural land. Most of site 59630 is classified as Non Agricultural, with a smaller proportion of the site classed as Grade 2 agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In terms of site 59630 containing a green infrastructure asset, this is dealt with separately under SA objective 5.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, sites 59761 and 59630 have been appraised in line with the site assessment criteria. As neither is within 100m of an AQMA, both receive a negligible effect in relation to this objective.</p> <p>With regard to SA objective13: material assets and waste, respondent has not expressed any disagreement over the effect given.</p> <p>With regard to SA objective 14: housing, sites 59761 and 59630 have been appraised in line with the site assessment criteria. As both sites have the potential to provide fewer than 100 dwellings, they receive</p>

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		<p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p>	<p>minor positive effects. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland.</p> <p>With regard to SA objectives 7: heritage and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59630.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.</p> <p>East Malling</p> <p>59448 Bradbourne Park Road</p> <p>Small site, no comment</p> <p>59449 Carnation Crescent</p> <p>Small site, no comment</p>	

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		<p>59450 Bradbourne Park Road</p> <p>Small site, no comment</p> <p>59630 Fields North or Amber Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an exitsing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p> <p>The site is within an area of open space that was originally provided by one of the parties developing the site, in-line with the description of the Site for the Phase 2 submission as agreed by the inspector. However, the site has been withdrawn by one of the parties developing the site, much to the disgust of the local residents, with a fence, which is regularly vandalised, even though it was registered as an Area of Community Value. Indeed, the only planned access is via Warren Woods Nature Park, with the planned removal of trees, even though one of the parties developing the site has agreed a maintenance plan for the area, which would clearly be invalidated by turning some of the woods into a road!.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band. The access would be via Amber Lane which is not wide enough to support the number of dwellings that would make the site economically viable.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p>	

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		<p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>The site is a major wildlife corridor joining the woods of Warren Wood and Hoath Wood. Loss of this important link would result in the deterioration of both sites.</p>	

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		<p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. On appeal, the inspector rejected the appeal including the impact on the vista. The development would be out of character with the rest of Kings Hill and clearly not part of that development, being separated from it by an area of ancient woodland.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land that is Grade 2 agricultural land. The area is designated by DEFRA as: Priority Habitat Inventory - Traditional Orchards (England) and, although one of the parties developing the site dug up all of the apple trees, one of the options they suggested to</p>	

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		<p>the inspector at the Phase 2 planning appeal was that the area could be used as an orchard.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the restricted access to the Kings Hill road network will result in local areas of congestion which will impact on local residents. The existing increased numbers of residents in the area has resulted in increased traffic to the Kings Hill sports centre, and such traffic will impact on congestion for access to this site.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p>	

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		<p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain Negligible (0?)</p> <p>Previous rejected plans for the site included fewer than 100 dwellings. The impact on the environment outweighs the benefits gained from such a development.</p>	
44304385	SA Report	<p>59631 Heath Farm, Wateringbury Road</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both), the only vehicular access to the facilities is along a route which is in excess of 10 miles round-trip. The open fields that had been provided as part of the Warren Woods nature park, including this site, have now been identified as potential development sites. The site overlaps the recently-created trim trail, which would need to be re-routed to allow for this development.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p>	<p>The SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth related to the delivery of employment opportunities rather than access to employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. This is due to the fact there is a green infrastructure asset in its southern corner. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of</p>

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		<p>Significant negative (--)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both). However, only primary schools are provided, and the direct access is via unlit fields, unless going by car, which would be a round-trip of in excess of 10 miles.</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. In addition, the bus routes for school pupils do not currently support this location.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The location of this residential site means that transport to employment locations is largely through narrow roads that are limited in their capacity, restricting the opportunities for employment.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm.</p>	<p>assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59631 is recorded as having an uncertain significant negative effect as it is not located near any settlements in rural locations</p> <p>With regard to SA objectives 2: services and facilities, 7: heritage, 8: water, 9: soil, 10: climate change mitigation, 11: climate change adaptation, 12: air quality, 13: material assets and waste and 14: housing, respondent has not explicitly expressed any disagreement over the effects given.</p>

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		<p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm..</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)/Uncertain Negative (-?)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse but falls within or partially within Source Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p>	

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		<p>The site is greenfield land and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Negative (-)</p> <p>The site is more than 800m from a railway station and more than 400m from a bus stop and cycle route.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p>	

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		<p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.</p> <p>59636Stickens Lane, Well Street</p> <p>Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically next to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.</p> <p>59673 Mill Street</p> <p>Small site, no comment</p> <p>59698 Clare Lane</p> <p>Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.</p> <p>59715 Wateringbury Road</p> <p>Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.</p> <p>59726 Wateringbury Road</p>	

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		Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use.	
44304385	SA Report	<p>59740 Broadwater Farm</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>The site would be over the KCC strategic cycle route and hence prevent implementation, resulting on a negative impact on the wellbeing of existing residents of Kings Hill.</p> <p>The site currently provides countryside for Kings Hill residents. The withdrawal of open space within Heath Farm by one of the parties developing the site has restricted the available options for Kings Hill residents, and further restrictions should be avoided.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The site is placed within the Fair Accessibility Band. Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a round-trip distance of around 5 miles, so even though the site is physically next to Kings Hill, it is not strategically connected to it.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an open space (Heath Farm Country Park) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This</p>

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		<p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Significant negative (--)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on the site, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. Adding a further stop for students in this site would further increase journey times increasing the issues.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may</p>	<p>would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlement of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>Site 59740 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater". This SA objective does not look at impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objectives 9: soil, 11: climate change adaptation, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given.</p>

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		<p>be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>As determined in the previous Local Development Framework, the site is a major wildlife corridor joining the East Malling Heath and beyond to West Malling and beyond. Loss of this important link would result in the deterioration of wildlife in the overall area.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located next to a number of small villages, and its implementation would result in a complete change from a rural area with villages to a continuous urban sprawl from Maidstone to West Malling and beyond. This would be a complete change of the character of the whole area from villages in a rural environment to urban sprawl and should be avoided. In addition, the value of conservation areas in the site would be largely lost.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. These would be severely reduced in value by development. These include the Cwylfa, the searchlight and generator buildings from the second world war, and land anchors for the previous hop fields as noted in the deeds for the area.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are</p>	

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		<p>uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. The water from the site drains into an area where it is extracted, and pollution from development would impact on the quality of the extracted water</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Negative (-)</p> <p>Most of the site, including the areas where the developer previously indicated that the dwellings would be built, is more than 800m of a railway station. There are multiple areas of concern regarding how the site could be effectively linked into the road system without impacting on quiet lanes and further work is required before this site should be considered for progressing further with regards to viability.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p>	

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		<p>The site is not within 100m of an AQMA. However, the major road networks: the A20 and M20 are both subject to AQMA and additional traffic from this development would impact significantly on those links.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p>	
44304385	SA Report	<p>"Wateringbury</p> <p>59624Pizien Well South of A26</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59654 Red Hill near traffic lights</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59664Red Hill near traffic lights</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59797 receives a mixed uncertain significant negative and minor positive effect in relation to SA objective 1: health and wellbeing because it contains an area of open space that could be lost as a</p>

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		<p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59700Tonbridge Road near traffic lights</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59722Pizien Well, A26</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59723Pizien Well</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59728 Off Red Hill</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59729 Off Red Hill</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59797 West part of Kings Hill Golf Course</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p>	<p>result of development, although this is uncertain. The site is also within 800m of an open space and walking path.</p> <p>With regard to SA objective 2: services and facilities, site 59797 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective. The SA is too high-level to consider road width. Air Quality Management Areas (AQMA) are considered separately under SA objective 12: air quality. As site 59797 is not within 100m of an AQMA, it receives a negligible effect. In terms of distance to service centres, the SA utilises the Urban Capacity Study, which considers distance to service centres. The capacity of service centres is not considered and would be difficult to quantify.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59797 is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59797 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development, although this is uncertain.</p> <p>Site 59797 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development,</p>

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		<p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Mallings is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p>	<p>and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59797 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objectives 8: water, 9: soil, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59797.</p>

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		<p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p>	

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		<p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p>	

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		<p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Watlington is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.</p> <p>59799Pizien Well</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p>	
44304385	SA Report	<p>59800 East part of Kings Hill Golf Course</p> <p>SA Objective 1: To improve human health and well-being</p>	Site 59800 receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing because it contains an area of open space that could be lost as a result of development, although this is uncertain. This is mixed with a minor positive effect, because

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p>	<p>despite the site containing an open space, it is within 800m of other areas of open space and a walking path.</p> <p>Sites 59800 and 59802 are placed in the Poor Accessibility Band, not the Fair Accessibility Band. For this reason, both sites receive a significant negative effect in relation to SA objective 2: services and facilities. The SA is too high-level to consider road width. Air Quality Management Areas (AQMAs) are considered separately under SA objective 12: air quality. As site 59797 is not within 100m of an AQMA, it receives a negligible effect. In terms of distance to service centres, the SA utilises the Urban Capacity Study, which considers distance to service centres. The capacity of service centres is not considered and would be difficult to quantify.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59800 and 59802 are already recorded as having significant negative effects. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59800 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development, although this is uncertain. There is also uncertainty as the actual effect will depend on the final design, scale and layout of development. Site 59802 is incorrectly recorded as having an uncertain significant negative effect, but is located on the edge of a settlement. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect.</p>

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		<p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p>	<p>Site 59800 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. Site 59802 also receives a signifivane negative effect in relation to SA objective 7. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, sites 59800 and 59802 receive uncertain significant negative effects. The uncertainty is as result of the fact the effects resulting from proximity to water bodies are uncertain at this stage.</p> <p>With regard to SA objective 10: climate change mitigation, sites 59800 and 59802 receive minor positive effect as although they are more than 800m from a railway station, they are within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, sites 59800 and 59802 have been appraised in line with the site assessment criteria. As they are not within 100m of an AQMA, they both receive a negligible effect in relation to this objective.</p> <p>With regard to SA objectives 9: soil, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59800.</p> <p>With regard to SA objectives 1: health and wellbeing, 9: soil,13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59802.</p>

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		<p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p>	

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		<p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.</p> <p>59802 Vineyard South of Hollandbury Park</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).</p>	

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		<p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p>	

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		<p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective6: To protect and enhance the borough's landscapeand townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p>	

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		<p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, with access via Canon Lane being on the A26, the impact on the AQMA at the traffic lights in the centre of Watlington is likely to be significant.</p>	

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		<p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities.</p>	
44304385	SA Report	<p>59803 East of Red Hill to A26</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59845 South of A26 to East of Wateringbury traffic lights</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>West Malling and Leybourne</p> <p>59432 Oxley Shaw Lane, Leybourne</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>Small site, no comment</p> <p>59441 Castle Way, Leybourne</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.</p> <p>59442 Castle Way, Leybourne</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.</p> <p>59443 Lillieburn, off Castle Way, Leybourne</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.</p> <p>59445 Oxley Shaw Lane, Leybourne</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.</p> <p>59447 Ryarsh Lane Car Park, central West Malling</p> <p>West Malling is an important service centre for the residents of Kings Hill, containing infrastructure which is not present in Kings Hill, such as post office, variety of pubs and restaurants, library; further restricting access to parking would result in issues with availability of such infrastructure, making Kings Hill unsustainable, given the distances required to travel to other service centres.</p> <p>59456 Baywell, Leybourne</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North.</p>	<p>In terms of additional traffic on the A228 and busy road junctions, the SA is too high-level to consider these issues, and so the Council will commission additional evidence on matters including traffic.</p> <p>In terms of access to car parking, this comment relates more specifically to the Local Plan than it does the SA.</p>

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		<p>59488Tesco Car Park, central West Mallng</p> <p>West Mallng is an important service centre for the residents of Kings Hill, containing infrastructure which is not present in Kings Hill, such as post office, variety of pubs and restaurants, library; further restricting access to parking would result in issues with availability of such infrastructure, making Kings Hill unsustainable, given the distances required to travel to other service centres.</p> <p>59594Malling Meadows, St Leonards Street</p> <p>West Mallng is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Mallng, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59602West of King Hill</p> <p>West Mallng is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Mallng, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59603West of King Hill</p> <p>West Mallng is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Mallng, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59619Norman Road to the railway</p> <p>West Mallng is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the</p>	

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		<p>infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59620Norman Road to the railway</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59621Norman Road to the railway</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59622Norman Road</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59645Offham Road</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59658Behind Parkfoot Garage A20</p> <p>The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given</p>	

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		<p>the closeness of other roads in the area, such as Town Hill to West Malling and the Birling Road, and the presence of Parkfoot garage nearby. The impact of such development could impact on the safety and throughput of the A20.</p> <p>59672Behind Parkfoot Garage A20</p> <p>The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, such as Town Hill to West Malling and the Birling Road, and the presence of Parkfoot garage nearby. The impact of such development could impact on the safety and throughput of the A20.</p> <p>59699Offham Road to Farterwell Road</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59714Offham Road next to Church Fields</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59716Offham Road to St Leonards Street</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59733Junction of King Hill and Ashton Way</p>	

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		<p>Access to this Site would be via King Hill, at a junction close to a very busy roundabout. KHPC consider that this would impact on road throughput and safety, especially with cars coming off the roundabout at speed, having to stop for cars waiting to turn right into the proposed site.</p> <p>59756More of Forty Acre Field next to Ashton Way and A20</p> <p>The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area,. The impact of such development could impact on the safety and throughput of the A20.</p> <p>59762Hawley Drive North of A20</p> <p>No comment</p> <p>59807Station Approach South of West Malling station</p> <p>There have already been a number of accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>Previously turned down by TMBC, Appeal rejected.</p> <p>59814West of Ashton Way</p> <p>It is unclear as to how access could be provided to this location; direct access to the A228 would be a safety issue. There have already been a number of accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on</p>	

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		<p>appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59833 Off Park Road off Castle Way</p> <p>Small site, no comment</p> <p>59844 More of Forty Acre Field next to Ashton Way and A20</p> <p>The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area,. The impact of such development could impact on the safety and throughput of the A20.</p> <p>59854 North West of West Malling Station</p> <p>This location has previously been earmarked for additional parking for West Malling station. Loss of this potential resource could become an impact on the viability of the area to support commuting into London now that Covid 19 impacts are reducing. In the past, many commuters have been forced to drive to other stations including Snodland, Ebbsfleet, Eltham, Mottingham and North Greenwich, to pick up better services thus adding to congestion on our already busy roads and increasing air pollution.</p> <p>59860 Off Swan Street by Lavenders Lane</p> <p>There have already been a number of accidents, including fatal, at the junction of Station Approach and A228. Adding further traffic onto this junction would be of great concern in terms of road safety. The Site has been rejected on appeal, primarily given the environment in the area, and KHPC see no justification for including this site in the proposed local plan.</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park</p>	

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		<p>to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre.</p> <p>59863South of M20 next to Junction 4</p> <p>It is assumed that access would be via Bull Road. Bull Road is a narrow road, with limited visibility. Adding an employment area at this point would have a disproportionate impact on the traffic in the area, including to/from Kings Hill and Leybourne Chase, leading to reduced throughput availability and reduced road safety.</p>	
44304385	SA Report	<p>"59424 Clearheart Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The local environment has limited community facilities. The community centre is inadequate for the current population and further competition would result in decreased availability for existing service users. The sports park is largely football (a new rugby pitch has been built, but not used significantly to-date, raising concerns about its viability) with four tennis courts, two of which have been permanently assigned to a single tennis club, limiting availability for ad-hoc hirers. The status of facilities, all being leased from one of the parties developing the site, means that there is potentially no long-term benefit to the community of the significant S.106 investments raising further concerns about long-term viability.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 2: services and facilities, site 59424 is recorded in the Urban Capacity Study (July 2022) as falling within the Good Accessibility Band and therefore receives a negligible effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59424 is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on</p>

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		<p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may</p>	<p>biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. This is a 'policy-off' appraisal that does not take into consideration mitigation so as to ensure all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape and townscape, site 59424 is incorrectly recorded as being within a settlement when it is on the edge of a settlement. This is as a result of the GIS analysis identifying a high percentage overlap between the site and settlement boundaries. In the next iteration of the SA, this site will receive an uncertain minor negative effect in relation to this objective.</p> <p>SA objective 9: soil considers whether a site is greenfield or brownfield, in addition to the Agricultural Land Classification. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. Priority Habitats are not explicitly considered in the SA but almost all Priority Habitats in the Borough are covered by the green infrastructure assets layer under SA5. The site receives a minor negative effect in relation to SA objective 9 because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59424 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p>

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		<p>be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>The site is a major wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Negative (-)</p> <p>This site is located outside a settlement. The boundaries of the settlement were sold off separately by MOD to protect the surrounding countryside and concentrate development on the brownfield land.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (-)</p>	<p>With regard to SA objectives 7: heritage and 8: water, respondent has not expressed any disagreement over the effects given for site 59424.</p>

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		<p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land. The area is registered by DEFRA as 'Priority Habitat Inventory - Deciduous Woodland (England)'. Site contains Ancient Woodland and TPO protected trees.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Major negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negative (-)</p> <p>The Site is an area of woodland surrounding the existing development. This provides a green lung for the area, and helps prevent some of the worst excesses of temperature on hot days; it is well documented that trees have a cooling effect on the environment and that is evidenced when walking around Kings Hill on a hot day in Summer, where a walker will experience a wall of heat when re-entering the village from the surrounding woodland.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the secondary access has been determined to be via the Teston Road, for which the primary access to the trunk road network is likely to be through Wateringbury. The addition of houses with access along the Wateringbury Road is likely to increase the number of vehicles turning right at the A26 / Red Hill traffic lights, which will significantly impact the throughput of the junction and the increase in pollution in that area. In addition, the main access road would be through a quiet</p>	

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		residential cul-de-sac which already has significant parking problems, resulting in potential issues with access."	
44422593	SA Report	<p>"PRoW</p> <p>The County Council welcomes the inclusion of the PRoW network within 1.42 Material Assets but would emphasise that the increase in population leads to inherent demands on the network. The existing PRoW network, particularly when improved and enlarged, could make a significant contribution to realise the Plan's aims for the future community and the prominence of walking and cycling should place this to the fore in future development plans.</p> <p>The Objectives proposed within this Interim Sustainability Appraisal Report all connect and overlap with the aims of the ROWIP, particularly:</p> <p>SA Obj 1 / SA Obj 2 / SA Obj 4 / SA Obj 5 / SA Obj 6 / SA Obj 10</p> <p>And the following from the Proposed SA Monitoring Framework:</p> <p>SA Obj 1 / SA Obj 2 / SA Obj 4 / SA Obj 6 / SA Obj 10 / SA Obj 12</p> <p>Waste Management</p> <p>The County Council, as Waste Disposal Authority, notes that paragraph C.63 in Appendix C Baseline Information needs to be updated to reflect the newly opened Allington HWRC within the Borough.</p> <p>Indicators and Targets for SA Objective 13 needs to recognise that these will only be met if sufficient infrastructure is provided. The County Council's commentary in respect of waste infrastructure and spatial distribution notes the current and future pressure on Waste Transfer Station infrastructure. Much emphasis is put on reduction of waste to landfill but Kent already sends less than 2%. Focus needs to be on providing infrastructure to facilitate increased recycling. "</p>	<p>Noted.</p> <p>In the next iteration of the SA Report, paragraph C.63 will be updated to reflect the fact Allington Household Waste Recycling Centre has now opened.</p>
45009345	SA Report	<p>"SA Objectives : 1/6/10/11/12 : these relate to health and well-being of residents, air pollution and protecting/enhancing the Borough's landscape and townscape whilst retaining character and quality. Surely by allowing development on 'greenbelt land' is contradictory to these statements.</p> <p>Increase in housing results in an increase in cars on roads which increases air pollution. Regardless of the fact that Councils rely heavily on people using public transport people will continue to use their own means of transport since it is the easier / quicker option for most."</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>In the next iteration of the SA Report, the cumulative effects section will give consideration to the increase in cars on the road as a result of growth and the adverse effects this may have on air quality. It is acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p>
42819617	SA Report	<p>"Interim Sustainability Report</p> <p>4.1 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended).</p>	<p>Detailed site appraisals were undertaken as part of the SA of the Regulation 18 Local Plan. The site assessment criteria used to appraise the sites can be found in Appendix D of the Interim SA Report. The justification text for the effects the site options are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. A total of 248 residential sites, 21 employment sites and 78</p>

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		<p>4.2 The SA of the Regulation 18 Local Plan for Tonbridge and Malling has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. While we generally support the approach and methodology for the SA, there are a number of improvements that could be made here to make a more reliable and accurate SA.</p> <p>4.3 First, the scope of the report. As required in planning practice, TMBC carried out a 6-week consultation on the scope of the SA. The SA covers the whole Borough for the plan period which we feel is appropriate. However, it is evident that they scope includes very high-level information gathering which results in a box-ticking exercise rather than a detailed site assessment. As a result, TMBC are unable to carry out a comprehensive assessment.</p> <p>4.4 The Regulation 18 Local Plan sets out strategic options for consultation, which will help inform the spatial and quantum approaches to development for the Local Plan. The growth options are generally considered reasonable alternatives for the scale of growth and overall spatial strategy for the Local Plan.</p> <p>4.5 Sites have been identified via a call-for-sites exercise and an Urban Capacity Study. It is important to note that during the call for sites exercise, there were limitations as to the information that could be provided to support each site submission. As set out above, it is important that the Council has a comprehensive understanding of each site when determining the growth strategy.</p> <p>4.6 Due to the overall scale of development proposed in the Local Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular those relating to the biodiversity and geodiversity, landscape, cultural heritage, water environment and soil resources. Some of these effects have the potential to be significant. However, the development proposed will meet the need for housing in the borough and will also stimulate the economic growth of Tonbridge and Malling."</p>	<p>mixed use sites were appraised as part of the SA of the Regulation 18 Local Plan.</p>
42819617	SA Report	<p>"Interim Sustainability Report</p> <p>4.1 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended).</p>	<p>Detailed site appraisals were undertaken as part of the SA of the Regulation 18 Local Plan. The site assessment criteria used to appraise the sites can be found in Appendix D of the Interim SA Report. The justification text for the effects the site options are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. A total of 248 residential sites, 21 employment sites and 78 mixed use sites were appraised as part of the SA of the Regulation 18 Local Plan.</p>

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		<p>4.2 The SA of the Regulation 18 Local Plan for Tonbridge and Malling has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. While we generally support the approach and methodology for the SA, there are a number there are a number of improvements that could be made here to make a more reliable and accurate SA.</p> <p>4.3 First, the scope of the report. As required in planning practice, TMBC carried out a 6-week consultation on the scope of the SA. The SA covers the whole Borough for the plan period which we feel is appropriate. However, it is evident that they scope includes very high-level information gathering which results in a box-ticking exercise rather than a detailed site assessment. As a result, TMBC are unable to carry out a comprehensive assessment.</p> <p>4.4 The Regulation 18 Local Plan sets out strategic options for consultation, which will help inform the spatial and quantum approaches to development for the Local Plan. The growth options are generally considered reasonable alternatives for the scale of growth and overall spatial strategy for the Local Plan.</p> <p>4.5 Sites have been identified via a call-for-sites exercise and an Urban Capacity Study. It is important to note that during the call for sites exercise, there were limitations as to the information that could be provided to support each site submission. As set out above, it is important that the Council has a comprehensive understanding of each site when determining the growth strategy.</p> <p>4.6 Due to the overall scale of development proposed in the Local Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular those relating to the biodiversity and geodiversity, landscape, cultural heritage, water environment and soil resources. Some of these effects have the potential to be significant. However, the development proposed will meet the need for housing in the borough and will also stimulate the economic growth of Tonbridge and Malling."</p>	
45646081	SA Report	<p>"I enclose a set of documents in relation to the above in respect of sites within Hadlow Parish identified by the respective five figure codes.</p> <p>Regardless of the fundamental objection to the development of greenfield sites for housing, Hadlow does not have the necessary infrastructure to service large scale housing. Furthermore, the A26 carries such heavy volumes of traffic that new vehicular accesses onto this principal route together with the intensification in the use of other sub-standard village roads such as, Court Lane and Carpenters Lane with unsafe junctions with the A26 is a substantial highway objection in its own right. It should also be noted that there is insufficient</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>In terms of the development of greenfield sites, the SA gives greenfield sites a significant negative or minor negative effect in relation to SA objective 9: soils, depending on whether they comprise best and most versatile agricultural land.</p> <p>The SA is too high-level to consider traffic volumes and access to car parking, so the Council will commission additional evidence on matters such as this.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>vehicular parking space to meet the existing population and service needs in the village centre.</p> <p>Please advise me of the next stage in the Local Plan.</p> <p>Note - rep contains several images</p> <p>Sites 59410 and 59601</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive(++)</p> <p>Comment: should be uncertain minor positive(+) as Hadlow medical centre fully subscribed.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative(-?)</p> <p>Should be significant negative(--). The area is Green Belt. And any development would have a significant negative impact on views of Hadlow Tower and the conservation area of the village on the approach from Tonbridge.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative(--?)</p> <p>Should be significant negative (--) As above: any development would have a significant negative impact on views of Hadlow Tower and the conservation area of the village on the approach from Tonbridge.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources Significant negative (---)/Uncertain significant negative(---?)</p> <p>Agree with TMBC finding: the site is within Flood Zone 3 and is prone to flooding. Run-off from any development could have a harmful effect on the river Bourne which runs alongside the site.</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 8': To protect and enhance the quality of water features and resources Negligible (0)</p> <p>Should be uncertain minor negative (-?). The site, along with other sites north of the A26, helps absorb flood water at times of run-off from the fields down from West Peckham parish.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+)</p> <p>Should be minor negative(-). There is no footpath or cycle path linking to Hadlow village and the A26 is a fast road and dangerous for pedestrians at that point. The likelihood of any residents using any</p>	<p>Sites 59410 and 59601 receive significant positive effects in relation to SA objective 1: health and wellbeing for the reasons outlined in the proformas. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 6: landscape and townscape, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. In terms of Hadlow Tower and the Conservation Area, these heritage assets are considered separately under SA objective 7: heritage.</p> <p>Sites 59410 and 59601 are both expected to have significant negative effects in relation to SA objective 7: heritage, as they are within 250m of numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59410 receives a mixed significant negative and negligible effect, as it contains land with a 1 in 30 year risk of surface water flooding. The site is not located in Flood Zone 3. The negligible effect is due to the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>Site 59601 receives an uncertain significant negative effect in relation to SA objective 8, as it falls within Flood Zone 3 and also contains land with a 1 in 30 year risk of surface water flooding. A watercourse also runs along the western edge of the site. The effect is recorded as uncertain, because the presence of a watercourse could result in significant negative effects on water quality, although this is uncertain at this stage of assessment.</p> <p>Sites 59601 receives a minor positive effect in relation to SA objective 10: climate change mitigation, as although it is more than 800m from a railway station, it is within 400m of a bus stop. This is in accordance with the site assessment criteria.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		form of transport other than private car is negligible. And due to the lack of parking space in the village, residents of any developments on this site would be more likely to use shops further afield with consequent increase in car use."	
45646081	SA Report	<p>"Site 59637 (note - rep contains images)</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:~</p> <p>SA Objective 1: To improve human health and well-being. Significant positive (++)/Uncertain significant negative(--?)</p> <p>Disagree with the possible rating of(++). Should be negligible (0)/Uncertain significant negative (--?) Any development on the site would have a negative effect for existing users of the footpath on their enjoyment of the countryside.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative(--?)</p> <p>Should be significant negative(--). The site is Green Belt with a well-used footpath running across it. For visitors to the Cemetery next to the site, it would adversely impact cherished views across the existing countryside to the Grade II listed Hadlow Tower.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative(--?).</p> <p>Should be significant negative(--), the site affects the setting of the cemetery next to it, with its Grade II listed war memorial.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources. Significant negative (--)/Negligible (O).</p> <p>Should be just Significant negative(--). The site is prone to flooding and run-off from any development could affect the health of the nearby pond.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor positive(+).</p> <p>Should be minor negative(-). There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>Site 59638</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive (++)</p> <p>The junction of the access road with the A26 is dangerous due to visibility and the speed of traffic using the A26.</p>	<p>Sites 59637, 59638 and 59647 receive significant positive effects in relation to SA objective 1: health and wellbeing for the reasons outlined in their proformas. This is in accordance with the site assessment criteria. With regard to site 59647, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to site 59638 and SA objective 5: landscape and biodiversity, the site is recorded as having a significant negative effect. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Water quality is dealt with separately under SA objective 8: water.</p> <p>With regard to SA objective 6: landscape and townscape, site 59638 is incorrectly recorded as not located near any settlements in a rural location, when it is in fact on the edge of a settlement. This is due to the fact the GIS analysis identified no percentage overlap between the site and settlement boundary. In the next iteration of the SA Report, this site will receive an uncertain minor negative effect in relation to SA6. Site 59637 is correctly recorded as not located near any settlements in a rural location. Although it is close to the settlement, it does not border it as site 59638 does. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. In terms of the Green Belt, this is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. Heritage assets are considered separately under SA objective SA objective 7: heritage.</p> <p>Site 59637 is expected to have a significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain significant negative(--?) Should be significant negative(--): the location of the site next to the pond would impact the quality of the water in the pond and the wildlife that use it.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative(--?)</p> <p>Should be significant negative (--): The site is Green Belt. Any development would adversely impact the rural setting of the pond, currently with trees and field behind it.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive(+) Should be minor negative(-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>Site 59647</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Significant positive(++).</p> <p>Should be Uncertain minor positive(+?): the Hadlow medical centre is over-subscribed with no room for expansion.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative(-?)</p> <p>Should be significant negative(--): The site is Green Belt. Traffic from any development of that size would cause unacceptable congestion on Court Lane and at the narrow junction with the A26.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor positive(+) Should be minor negative(-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>Site 59659</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Significant positive(++).</p> <p>Should be Uncertain minor positive(+?): the Hadlow medical centre is over-subscribed with no room for expansion. The junction of the proposed access road with the A26 is dangerous.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p>	<p>With regard to SA objective 8: water, site 59637 receives a mixed significant negative and negligible effect, as it contains land with a 1 in 30 year risk of surface water flooding. The site is not located in Flood Zone 3. The negligible effect is due to the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>Sites 59637, 59638 and 59647 receive minor positive effects in relation to SA objective 10: climate change mitigation, as although they are more than 800m from a railway station, they are within 400m of a bus stop. This is in accordance with the site assessment criteria.</p> <p>There is no proforma for site 59659.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative(-?)</p> <p>Should be minor negative(-) The site is Green Belt.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive(+) Should be minor negative(-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge."</p>	
45646081	SA Report	<p>"Site 59686 (note rep contains images)</p> <p>Same site as 59659 above</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Significant positive (++).</p> <p>Should be Uncertain minor positive(+?): the Hadlow medical centre is over-subscribed with no room for expansion. The junction of the proposed access road with the A26 is dangerous.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative(-?)</p> <p>Should be minor negative(-) The site is Green Belt.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive(+)</p> <p>Should be minor negative(-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>Site 59776</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive (++)/Uncertain significant negative (--?)</p> <p>Should be significant negative(--): Carpenters Lane is unsuitable for the amount of traffic that would be generated by the development: this would impact the well-being of local residents. The junction with the A26 would be dangerous with the increased traffic turning on to the main road. The local medical centre is over-subscribed with no room for expansion.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative(--?).</p>	<p>Sites 59686, 59776, 59853, 59842 and 59834 receive significant positive effects in relation to SA objective 1: health and wellbeing for the reasons outlined in their proformas, whilst sites 59811 and 59747 receive minor positive effects and site 59859 receives a mixed significant positive and uncertain significant negative effect. This is in accordance with the site assessment criteria. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA is also too high-level to consider traffic congestion and dangerous road junctions, but the Council will be commissioning additional evidence on matters including traffic. SA objective 1 looks at accessibility to healthcare facilities and things like open space, not the impacts of traffic congestion on residents.</p> <p>With regard to site 59859 and SA objective 5: landscape and biodiversity, the site is recorded as having a significant negative effect. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. Water quality is dealt with separately under SA objective 8: water.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59795 and 59811 receive significant negative effects for the reasons outlined in their proformas, and sites 59686, 59776 and 59842 receive minor negative effects. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. In terms of the Green Belt, this is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. Heritage assets are considered separately under SA objective 7: heritage.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Should be significant negative (--). The site is Green Belt. Any development would adversely impact the setting of Williams Field, the main open space in the village.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative(-).</p> <p>Should be significant negative. Minor negative(-)/significant negative(--) depending on the exit points from the development. There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>Site 59795</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain significant negative(--?)</p> <p>Uncertainty as to location of site. If it is not the brownfield site as claimed by TMBC, but the field with trees next to it as shown on the TMBC map, the site would be Green Belt.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination. Significant positive(++)</p> <p>Uncertain whether site is brownfield land. The TMBC map shows the site to be the field with trees, and not the brownfield site next to it.</p> <p>Site 59811</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Minor positive(+).</p> <p>Should be significant negative(--) due to the adverse effect on the well-being of Hadlow residents from a large amount of increased traffic. Hadlow is the nearest large village and is where much of the traffic from the site would access the A.26. This would most likely lead to much-increased congestion in Carpenters Lane and at the junction with the A26 which already sees queues of traffic exiting onto the main road.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative(--?)</p> <p>Should be Significant negative (--). The site is Green Belt. It forms part of the parkland of historic Oxenhoath estate and is crossed with footpaths affording sweeping views across the countryside to the Grade II listed Had low Tower and beyond.</p>	<p>Site 59811 is expected to have a significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Sites 59859, 59842 and 59834 receive uncertain significant negative effects in relation to SA objective 8: water for the reasons outlined in their proformas. The reason the effects are recorded as uncertain are due to the fact all three sites contain watercourses or water bodies but effects on water quality are uncertain at this stage of assessment. Site 59834also falls within Source Protection Zones 1, 2 and 3.</p> <p>With regard to SA objective 9: soil, sites 59795 and 59853 comprise brownfield land and so receive significant positive effects in relation to SA objective 9. TMBC informed LUC that both these sites comprise brownfield land.</p> <p>Sites 59686, 59776, 59853 receive minor positive effects in relation to SA objective 10: climate change mitigation, as although they are more than 800m from a railway station, they are within 400m of a bus stop. This is in accordance with the site assessment criteria. Sites 59811 and 59747 receive minor negative effects as they are not within close proximity of a railway station, bus stop or cycle route.</p> <p>There is no proforma for site 59865.</p>

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource. Uncertain significant negative(--?). Should be Significant negative (--). The site almost completely surrounds the historic grade II listed Oxenhoath and its gardens and parkland.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-). Should be significant negative (--). No nearby public transport and no cycle paths to allow safe cycling means that all road journeys will be by car.</p> <p>Site 59853</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive(++).</p> <p>Should be Uncertain significant negative(--?): The increase in traffic from the site and the congestion caused would have an adverse effect on the well-being of residents of Court Lane. Neither Court Lane nor Victoria Road are suitable to take a large amount of increased traffic. It would also cause congestion and long delays at the narrow junction with the A26. There is inadequate infrastructure to enable safe walking from the site to Had low to access village facilities, although a footpath could be added as part of a development. However, the distance from the village centre would lead many residents to use their cars rather than walk. There is no infrastructure to allow safe cycling around Had low and further to Tonbridge. Had low medical centre is over-subscribed with no room for expansion</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination. Significant positive (++).</p> <p>Should be minor negative(-). Only about 50% of the site is brownfield. The rest is grass with some under agricultural cultivation.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive(+). Should be minor negative: most of the site is more than 400m from a bus stop.</p> <p>Site 59859</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive (++)/Uncertain significant negative(--?)</p> <p>Should be just Uncertain significant negative(--?): the access on to Carpenters Lane is on a dangerous bend with poor visibility.</p>	

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		<p>SA Objective 5: To protect and enhance biodiversity and geodiversity. Uncertain significant negative(--?). Should be Significant negative(--): the site runs alongside the river Bourne and would impact the biodiversity of the river, particularly due to flooding of the site.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--) / Uncertain significant negative (--)</p> <p>Should be just Significant negative. The site is on the flood plain of the river Bourne; it is prone to flooding and is in Flood Zone 3. Any run off will adversely impact the quality of water in the Bourne.</p> <p>Site 59842</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being Significant positive (++).</p> <p>Should be Significant negative (--): The size of the development would adversely impact the well-being of Had low residents as traffic from the development would increase congestion in the village centre.</p> <p>Had low medical centre is fully subscribed with no room for expansion.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative(-?)</p> <p>Should be Uncertain Significant negative(--?): The site lies between two well-used footpaths and any development would adversely impact walkers' enjoyment of the countryside.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources. Significant negative(--) / Uncertain significant negative(--?)</p> <p>Should be Significant negative (--): The site is prone to flooding, but it also has a valuable role in absorbing run-off of excess water during heavy rainfall from the fields north of the A26 towards West Peckham parish, thereby helping prevent flooding of Hadlow village. Development of the site could lead to serious flooding of homes in the village - particularly along Maidstone Road. There are two streams crossing the site, ultimately feeding into the river Bourne. Any development would therefore affect the quality of the water in the streams and the Bourne.</p> <p>Sites 59834 and 59865</p>	

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		<p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Significant positive(++)</p> <p>Should be minor negative (-): Any development on the site would have a negative effect for the many users of the footpath (MT160) on their enjoyment of the countryside.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources. Significant negative (--)/Uncertain significant negative(--?)</p> <p>Should be just Significant negative(--): development on the flood plain could exacerbate flooding further downstream.</p> <p>Site 59747</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Minor positive(+)</p> <p>Should be Significant negative (--): The size of the development would adversely impact the well-being of Had low residents as traffic from the development would increase congestion through the village centre. No medical facilities nearby; Had low Medical Centre is the nearest, but is fully subscribed with no room for expansion .</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-) Should be significant negative(--). No nearby bus stop and no cycle paths to allow safe cycling means that all road journeys will be by car."</p>	
45646081	SA Report	<p>"Site 59806 (note rep contains images/maps)</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Minor positive (+)</p> <p>Should be Significant negative(--): The huge scale of the development would adversely impact the well-being of Had low residents as traffic from the development would increase congestion through the village centre. No medical facilities nearby; Hadlow Medical Centre is the nearest, but is fully subscribed with no room for expansion, so there would need to be purpose-built medical facilities within the development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain significant negative(--?)</p>	<p>Sites 59806 and 59846 receive minor positive effects in relation to SA objective 1: health and wellbeing for the reasons outlined in their proformas. This is in accordance with the site assessment criteria. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA is also too high-level to consider traffic congestion, but the Council will be commissioning additional evidence on matters including traffic. SA objective 1 looks at accessibility to healthcare facilities and things like open space, not the impacts of traffic congestion on residents.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59806 and 59721 receive significant negative effects for the reasons outlined in their proformas, and sites 59685 and 59693 receive minor negative effects. This is in accordance with the site assessment criteria. Site 59805 is incorrectly recorded as not located near any settlements in a rural location, when it is on the edge of a settlement, as a result of the small percentage overlap between it and the settlement. In the next</p>

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		<p>Should be Significant negative(--): there would be a large loss of Green Belt, including woodland</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative(-) Should be significant negative(--). No nearby bus stop and no cycle paths along the A26 and A228 to allow safe cycling means that all road journeys will be by car.</p> <p>Site 59846</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: To improve human health and well-being. Minor positive(+)</p> <p>Should be Significant negative(--): The size of the development would adversely impact the well-being of Had low residents as traffic from the development would increase congestion through the village centre. No medical facilities nearby; Had low Medical Centre is the nearest, but is fully subscribed with no room for expansion.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative(-) Should be significant negative(--). No nearby bus stop and no cycle paths to allow safe cycling means that all road journeys will be by car.</p> <p>The following sites are between Tonbridge and the boundary of Hadlow parish and</p> <p>could reduce the ""separation"" of Hadlow from the larger urban area:</p> <p>Sites 59685 and 59689</p> <p>This site is outside Hadlow parish boundary, but Hadlow Parish Council has the following concern:</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain minor negative{-?}</p> <p>Should be a significant negative(--): the outward sprawl of Tonbridge towards Had low and its outlying hamlets, is contrary to TMBC's anti-coalescence aims as it threatens the individual identity of Hadlow.</p> <p>Site 59693</p> <p>This site is outside Hadlow parish boundary, but Hadlow Parish Council has the following concern:</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain minor negative{-?}</p>	<p>iteration of the SA Report, site 59805 will receive a minor negative effect instead of a significant negative effect in relation to SA6. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. In terms of the Green Belt, this is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Sites 59806 and 59846 receive minor negative effects in relation to SA objective 10: climate change mitigation, as they are not within close proximity of a railway station, bus stop or cycle route. This is in accordance with the site assessment criteria.</p> <p>Site 59689 was a duplicate of site 59685 and so removed.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Should be a significant negative(--): the outward sprawl of Tonbridge towards Hadlow and its outlying hamlets, is contrary to TMBC's anti-coalescence aims as it threatens the individual identity of Had low.</p> <p>Site 59721</p> <p>his site is outside Hadlow parish boundary, but Hadlow Parish Council has the following concern:</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain minor negative(-?</p> <p>Should be a significant negative(--): the outward sprawl of Tonbridge towards Had low and its outlying hamlets, is contrary to TMBC's anti-coalescence aims as it threatens the individual identity of Hadlow.</p> <p>Site 59805</p> <p>This site is just outside Hadlow parish boundary, but Hadlow Parish Council has the following concern:</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain minor negative(-?</p> <p>Should be a significant negative(--): the outward sprawl of Tonbridge towards Hadlow and its outlying hamlets, is contrary to TMBC's anti-coalescence aims as it threatens the individual identity of Had low"</p>	
42764129	SA Report	<p>"I am wiring in relation to the local plan (regulation 18) consultation and the planned development on Ismay's Road and Ivy Hatch.</p> <p>The planned development appears to be badly researched and based on faulty analysis.</p> <p>Please see below for my detailed thoughts and comments.</p> <p>I look forward to hearing from you in response.</p> <p>Representation to the Tonbridge and Malling Borough Council (TMBC) Regulation 18 Local Plan and Interim Sustainability Appraisal</p> <p>Please find below our representation to the TMBC Regulation 18 Local Plan consultation. This representation objects to the proposed</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59608 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration o the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is within 500m of the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>allocation of Land to east of Ismays Road, Ivy Hatch (Site 59608) for residential development.</p> <p>Context</p> <p>The National Planning Policy Framework (NPPF)[1] (#_ftn1) [1] provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:</p> <ul style="list-style-type: none"> * an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; * a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and * an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. <p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for</p>	<p>AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report[2] (#_ftn2) [2] is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p>	

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		<p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of this Site would not represent sustainable development through actively reducing health inequalities, improving access to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p>	

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		<p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan[3] (#_ftn3) [3]. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p> <p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p>	

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		<p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nursery grounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the</p>	

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		<p>Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p> <p>In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need.</p>	

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		<p>Conclusion</p> <p>The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to.</p> <p>The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change.</p> <p>In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>We consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In our view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and we request that the Site is not allocated in the emerging Local Plan.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>(#_ftnref1)</p> <p>(#_ftnref2)</p> <p>(#_ftnref3) "</p>	
42473025	SA Report	<p>"Ightham and Ivy Hatch are within MGB and the Kent Downs Area of Outstanding Beauty.</p> <p>I believe those protections should be applied in the Local Plan and I concur with the NPPF (July 2021):</p> <p>Para 137 The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>Para 176 Great weight should be given to conserving and enhancing landscape and scenic beauty in AONB which has the highest status of protection in relation to planning issues.</p> <p>Dark Hill Farm 59709 – I object to the development of this site for the following reasons:</p> <p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p> <p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. The traffic on the A227 and A25 is routinely at a standstill into Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Ightham, Ivy Hatch and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA acknowledges that sites 59709, 59720, 59871, 59872, 59608, 59770 and 59830 are located within 500m of the AONBs and for this reason, they receive significant negative effects in relation to SA objective 6: landscape and townscape. This wording is used for sites that are within the AONBs, as well as within 500m of them. All adverse effects against the landscape objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than public transport links, the road network and traffic congestion. Access to public transport is dealt with separately under SA objective 10: climate change mitigation. Therefore, sites 59709, 59720, 59871, 59872, 59608, 59770 and 59830 have been appraised in accordance with the site assessment criteria and receive the correct effects against SA objective 2, utilising the information contained within the Urban Capacity Study (July 2022).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. If a site contains an existing business that could be lost as a result of residential</p>

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		<p>SA Objective 4:</p> <p>The employment opportunities are impossible to assess as no detail are provided.</p> <p>SA Objective 5:</p> <p>This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will result in the coalescence of Borough Green and Ightham. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>This site is close to the Heritage asset of Ightham Court protected as an Historic Park and Garden. It is within 100m of a Conservation Area.</p> <p>SA Objective 8:</p> <p>This site is entirely or significantly within Flood Zone 3 and has evidence of low-lying water.</p> <p>SA Objective 9:</p> <p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p>	<p>development, it receives a minor negative effect. All mixed use and employment site options are expected to have positive effects on this objective, as they provide opportunities for new jobs.</p> <p>The Kent Downs AONB is dealt with under SA objective 6: landscape and townscape, not SA objective 5: biodiversity and geodiversity. AONBs and the Green Belt are not recognised for their biodiversity value, rather they relate to landscape. The five purposes of Green Belt as outlined in the NPPF are not inherently sustainability issues and therefore consideration is not given to the Green Belt in SA.</p> <p>The historic environment is dealt with under SA objective 7: heritage, not SA objective 6: landscape and townscape. Loss of open space is dealt with under SA objectives 1: health and wellbeing and 6: landscape and townscape.</p> <p>Sites 59709, 59770 and 59830 receive uncertain significant negative effects in relation to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 8: water and 9: soil. Sites 59720 and 59608 also receive uncertain significant negative effects against these objectives, with the exception of SA objective 8: water. Sites 59871 and 59608 also receive these effects against the same objectives, with the exception of SA objectives 5: biodiversity and geodiversity and 8: water. Site 59608 is expected to have a significant positive effect in relation to SA objective 9: soil, as it comprises brownfield land. TMBC informed LUC that site 59608 comprises brownfield land.</p> <p>Sites 59709 and 59830 receive significant positive effects in relation to SA objective 10: climate change mitigation, as they are within close proximity of a railway station. This may encourage people to use public transport over the private car. Sites 59720, 59871, 59872, 59608, 59770 are not within close proximity of a railway station but are close to bus stops and so may also help reduce reliance on the private car but to a lesser extent.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>The proformas correctly acknowledge when a site is within 100m of an AQMA or not, against SA objective 12: air quality. They also correctly acknowledge when a site is within a Minerals Safeguarding Area, against SA objective 13: material assets and waste.</p> <p>SA objective 14: housing relates solely to the delivery of new housing, not the location of sites on the edge of historic villages.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>This development is within 100m of the AQMA in Borough Green so the increased traffic movements will adversely impact the air quality in that area.</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p> <p>Objective 14:</p> <p>This development is wholly unsuitable in size and position, on the edge of the historic village of Ightham. Its scale will significantly and adversely impact the community and have an detrimental effect on this small historic rural settlement.</p> <p>Gracelands 59720</p> <p>And Borough Green Road 59793 - I object to the development of these sites for the following reasons:</p> <p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p> <p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. The traffic on the A227 and A25 is routinely at a standstill into</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Ightham, Ivy Hatch and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>n/a as a residential site</p> <p>SA Objective 5:</p> <p>This site is in the Kent Downs AONB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will contribute to the coalescence of Borough Green and Ightham. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>This site is close to the Heritage asset of Ightham Court protected as an Historic Park and Garden. It is within 100m of a Conservation Area.</p> <p>SA Objective 8:</p> <p>This site is entirely or significantly within Source Protection Zones 2 and 3.</p> <p>SA Objective 9:</p>	

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		<p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>N/A</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p> <p>Objective 14:</p> <p>This development is wholly unsuitable in size and position, on the edge of the historic village of Ightham. Its scale will significantly and adversely impact the community and have an detrimental effect on this small historic rural settlement.</p> <p>Gracelands 59871</p> <p>and Ightham By-Pass 59872 - I object to the development of these sites for the following reasons:</p> <p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p>	

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		<p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. The traffic on the A227 and A25 is routinely at a standstill into Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Ightham, Ivy Hatch and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>n/a as a residential site</p> <p>SA Objective 5:</p> <p>This site is in the Kent Downs AONB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will contribute to the coalescence of Borough Green and Ightham. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>This site is close to the Heritage asset of Ightham Court protected as an Historic Park and Garden. It is within 100m of a Conservation Area.</p> <p>SA Objective 8:</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>This site is entirely or significantly within Flood Zone 2.</p> <p>SA Objective 9:</p> <p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>N/A</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p> <p>Objective 14:</p> <p>This development is wholly unsuitable in size and position, on the edge of the historic village of Ightham. Its scale will significantly and adversely impact the community and have a detrimental effect on this small historic rural settlement.</p> <p>Ismays Road 59608 - I object to the development of this site for the following reasons:</p> <p>SA Objective 1:</p>	

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		<p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p> <p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. The traffic on the A227 and A25 is routinely at a standstill into Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Ightham, Ivy Hatch and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>n/a as a residential site</p> <p>SA Objective 5:</p> <p>This site is in the Kent Downs AONB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>This site is close to Ightham Mote (scheduled monument) and is in close proximity to the Ivy Hatch Conservation Area.</p> <p>SA Objective 8:</p>	

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		<p>N/A.</p> <p>SA Objective 9:</p> <p>This development is questionable whether this is a brownfield site. It is used for agricultural purposes and is in the MGB and AONB. Development of the site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>N/A</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p> <p>Objective 14:</p> <p>This development is wholly unsuitable in size and position, on the edge of the historic village of Ivy Hatch. Its scale will significantly and adversely impact the community and have a detrimental effect on this small historic rural settlement.</p> <p>Rectory Lane 59770 – I object to the development of this site for the following reasons:</p>	

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		<p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p> <p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. The traffic on the A227 and A25 is routinely at a standstill into Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Ightham, Ivy Hatch and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>The employment opportunities are impossible to assess as no detail are provided.</p> <p>SA Objective 5:</p> <p>This site is in a Special Landscape Area and Area of Special Character close to the Kent Downs AONB and in MGB. The development of this site would have a negative effect on the biodiversity of all of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p>	

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		<p>This site is close to the Heritage asset of Ightham Court protected as an Historic Park and Garden. It is within 100m of a Conservation Area.</p> <p>SA Objective 8:</p> <p>This site is entirely or significantly within Flood Zone 3 .</p> <p>SA Objective 9:</p> <p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>This development is close to the AQMA in Borough Green so the increased traffic movements will adversely impact the air quality in that area.</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p> <p>Objective 14:</p> <p>This is one of many sites put forward whose development is wholly unsuitable in size and position, on the edge of the historic village of Ightham. Its scale will significantly and adversely impact the</p>	

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		<p>community and have an detrimental effect on this small historic rural settlement.</p> <p>Borough Green Gardens 59830 I object to the development of this site for the following reasons:</p> <p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development.</p> <p>SA Objective 2:</p> <p>The traffic on the A227 and A25 is routinely at a standstill into Sevenoaks and Borough Green. Development of this site would put unacceptable pressure on these A roads and the narrow country lanes in the villages of Borough Green, Platt, Ightham, Ivy Hatch.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>The employment opportunities are impossible to assess as no detail are provided.</p> <p>SA Objective 5:</p> <p>This site is in MGB and partially in the Kent Downs AONB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>This development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham, Platt and Borough Green. It will result in the coalescence of Borough Green and Ightham. It will result in the loss of 'green space' and will have a</p>	

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		<p>harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>This site is close to the Heritage asset of Ightham Court protected as an Historic Park and Garden.</p> <p>SA Objective 8:</p> <p>This site is entirely or significantly within Flood Zone 3. And has a protected water source (zone 1).</p> <p>SA Objective 9:</p> <p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p> <p>This development is within 100m of the AQMA in Borough Green so the increased traffic movements will adversely impact the air quality in that area.</p> <p>Objective 13:</p> <p>This site is within a mineral safeguarding area.</p>	

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		<p>Objective 14:</p> <p>This development is wholly unsuitable in size and position, on the edge of the village of Borough Green. Its disproportionate scale will significantly and adversely impact the community and have an detrimental effect on the surrounding villages."</p>	
42473025	SA Report	<p>Further to my response to The Regulation 18 Consultation, I am concerned about the consistent use of the term 'this site is within 500m/250m of the AONB' (Objective 6 of the Sustainability Assessments) when the sites appear to sit wholly within the Kent Downs AONB. Eg 59709, 59720 and others. Maybe my mistake, but, please can this be noted.</p>	<p>Sites receive uncertain significant negative effects when they are within, or within 500m of, an AONB. The SA gives all sites that are within 500m of an AONB a significant negative (--) effect, in recognition of the potential for development outside of, but near to the AONB, to have an effect.</p>
46103169	SA Report	<p>"Sustainability Appraisal</p> <p>The Regulation 18 version of the Local Plan is accompanied by a Sustainability Appraisal (SA) report which is a legal requirement derived from the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires local plans to be prepared with a view to contributing to the achievement of sustainable development.</p> <p>The requirement for Strategic Environmental Assessment (SEA), in addition to the SA, is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004".</p> <p>In line with best practice the SEA has been incorporated into the SA of the Regulation 18 Plan. The planning practice guidance sets out detailed consideration as to how any sustainability should assess alternatives and identify likely significant effects:</p> <p>The sustainability appraisal needs to consider and compare all reasonable alternatives as the plan evolves, including the preferred approach, and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the plan were not to be adopted. In doing so it is important to:</p> <ul style="list-style-type: none"> • outline the reasons the alternatives were selected, and identify, describe and evaluate their likely significant effects on environmental, economic and social factors using the evidence base (employing the same level of detail for each alternative option). Criteria for determining the likely significance of effects on the environment are set out in schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004; • as part of this, identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them; • provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives. Any assumptions used in 	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report. This means that each reasonable alternative development site option is appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

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		<p>assessing the significance of the effects of the plan will need to be documented. Reasonable alternatives are the different realistic options considered by the plan- maker in developing the policies in the plan. They need to be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The development and appraisal of proposals in plans needs to be an iterative process, with the proposals being revised to take account of the 5 Local Plan Regulation 18 Consultation November 2022 appraisal findings. Paragraph: 018 Reference ID: 11-018-20140306 Revision date: 06 03 2014 The appendix to the Sustainability Appraisal sets out an assessment of the individual sites in the HELAA against the Sustainability Objectives of the SA. The objectives are considered to be relevant and comply with the guidance in this regard.</p> <p>The Vision Document as submitted alongside these representations considers how the Land to the North of Offham Road performs against the individual criteria and a reassessment of the scoring has been made where appropriate. This shows that the site would bring about significant benefits against a number of the Sustainability Objectives. Where impacts are recorded, these are minimal and can be addressed through appropriate mitigation. The overall summary of scoring against the Sustainability Objectives shows the site to be highly appropriate for allocation in future versions of the Local Plan.</p> <p>As the plan progresses through to the next stages of the consultation process, further information and technical studies will be produced in order to provide a more accurate scoring against the sustainability appraisal which will demonstrate the suitability of the site for allocation."</p>	
42722497	SA Report	<p>I would like to object to the proposed potential Residential Development of the site 59617 and 59703 in Potash Lane, Platt. This plot is in the Green Belt and is outside the village envelope. It is located in Potash Lane which effectively is a single track road which makes it extremely difficult for HGV vehicles to gain access. The roads are already congested for the existing homeowners to use and we already suffer from a lack of parking in Potash Lane. Furthermore, it is adjacent to an Area of Natural Beauty and a Conservation area and it would obscure the view from The Barn which is a Listed Building. I have spoken with several neighbours and they are all in agreement with my comments. yours faithfully Richard & Anne Self</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Sites 59617 and 59703 receive minor negative effects in relation to SA objective 6: landscape and townscape, as they are both located on the edge of a settlement. The effects are recorded as uncertain, as the actual effects are dependent on the design, scale and layout of development, which may help mitigate any adverse effect.</p> <p>The SA is too high-level to consider road width, traffic congestion and lack of access to car parking, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA acknowledges that both sites are located adjacent to the Platt Conservation Area which contains numerous heritage assets and for this reason, both sites receive a significant negative effect in relation to SA objective 7: heritage. The effect is recorded as uncertain, as the actual effect is dependent on factors such as the design of development and whether there are lines of sight between the</p>

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			development site and nearby heritage assets. Neither site is located adjacent to the AONB.
42438273	SA Report	59750, 59749, 59599, 59597, 59752, 59816, 59598, 59759, 59760, 59755, 59758, 59754, 59757, 59761 - all of these sites represent significant destruction of greenbelt, loss of rural classification and potential devastation of the character of the village of Mereworth. There is little infrastructure in the village already - these would put further pressure on traffic, environment, local services such as schools, health and public transport. While a small number of additional houses (in single figures) would not be an issue the scale of these proposals is devastating. Mereworth would be subsumed into a greater Kingshill. 59884, 59634, 59603 - Represent excessive loss of green space in Kingshill which is increasingly densely populated and has relatively less and less green space. 59797, 59866, 59811, 59830 are excessive in size, represent major loss of greenbelt/rural landscape, significant increase in traffic, loss of environmental quality and pressure on infrastructure.	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration is given to the landscape under SA objective 6: landscape and townscape. If a site is not located near any settlements in a rural location and/or would result in a loss of designated open space, it receives an uncertain significant negative effect. The effect is uncertain, as the actual effect is dependent on the final design, scale and layout of development.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic. The environment is considered under SA objective 5: biodiversity and geodiversity, whilst schools and healthcare are considered under SA objectives 3: education and 1: health and wellbeing, respectively. Public transport is considered under SA objective 10: climate change mitigation.</p> <p>The SA acknowledges that development of site 59884 will result in a loss of open space, under SA objective 1: health and wellbeing, and therefore receives a significant negative effect in relation to this objective (as part of a mixed effect). The effect is recorded as uncertain, as the actual effect will depend on the exact scale, layout and design of development and whether the open space is lost or incorporated into the development.</p> <p>Site 59634 does not contain designated open space, but does contain a large area of Ancient Woodland which is acknowledged in the SA. For this reason, the site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. The effect is recorded as uncertain, as there may be opportunities to promote habitat connectivity if new development includes green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for adverse effects, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59603 does not contain designated open space, but does contain a green infrastructure asset in its northern corner. Therefore, the site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. The effect is uncertain for the reasons outlined in the previous paragraph.</p> <p>All sites listed have been subject to SA, which provides an objective assessment of their performance against the fourteen SA objectives.</p>
42643873	SA Report	The sustainability objectives completely ignore the protection of Green Belt Land. There should be an objective to avoid the loss of Green Belt land.	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.

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			SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.
42562465	SA Report	The colour coding of the summaries and the + / - / ? marks are completely unclear and have no legend or explanation as to what they mean and how they can be compared.	Table 2.1 in the Interim SA Report provides a key to the symbols and colour coding used in the SA. The PDF version of the Report available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template abides by WCAG 2.1 regulations to the highest standard (level AAA).
42798817	SA Report	Please could we include an additional aim here which commits to identifying and securing innovations in energy production from waste, e.g. biofuels from agricultural waste products and/or biochar from agricultural waste to enhance soil quality?	In the next iteration of the SA Report the following sub-objective will be added under SA objective 10: climate change mitigation: "To encourage the production of energy from waste."
25361537	SA Report	In respect of landscape - Appendix D of the Interim sustainability Report provides the Site Assessment Criteria: SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality D.22. In addition, proximity to the Kent Downs and High Weald AONB's can provide an indication of the potential for development to have adverse impacts on those designated landscapes. Sites that are within 500m of the AONB could have a significant negative (- -?) effect. We would raise a concern that sites further than the specified 500 metres from the AONB boundary have potential to have significant negative effects on designated landscapes, particularly strategic scale sites. We therefore consider that the criteria should be amended to be up to 2 km where likely to be visible from an AONB. It should also be clarified that D22 also applies to sites that lie within an AONB boundary.	500m was considered a reasonable distance and has been used in other SAs for Local Plans elsewhere which have been found sound and adopted. This is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to identify which sites are actually visible from an AONB at 2km. All sites have been appraised consistently using the same buffer distance. Tonbridge and Malling Borough Council has commissioned a Landscape Sensitivity Assessment, which will focus on larger strategic sites outside of the Green Belt and the impacts development might have on the landscape.
42798817	SA Report	Please could we include an additional aim here which commits to identifying and securing innovations in energy production from waste, e.g. biofuels from agricultural waste products and/or biochar from agricultural waste to enhance soil quality?	In the next iteration of the SA Report the following sub-objective will be added under SA objective 10: climate change mitigation: "To encourage the production of energy from waste."
25315361	SA Report	Under para 3.55, the issue of AONBs must be considered not just in terms of development on the ANOB but in terms of development up against the AONBs. The North Downs AONB is as much an asset when viewed from beyond the base as from the summit. Yet current planning assessments seem to prioritise views from the North Downs and not views of the AONB from within the near landscape below. A recent comment from the North Downs ANOB in response to the Bushey Wood proposal stated that "In order to help the development, recede as far as possible into the landscape when viewed from the AONB, we would request that it is specified that pale coloured facing materials are not used on elevations facing towards views from the AONB". The implication here being that is no problem with bright buildings detracting from the views of the Downs from below, even if those buildings are within 500 metres of the base of the ANOB area. Under para 3.74, flooding is considered only in terms of rainfall and storms. Below Allington lock the river Medway is tidal and the principal issue is (or should be) sea level. Unless the Local Plan	Paragraph 3.55 states "The key sustainability issue affecting landscape character and quality within the borough is the pressure of new development within the AONBs and their setting , and the effects this has on the preservation of the key landscape characteristics" [emphasis added]. Therefore, consideration is given to development within the AONBs and outside of them. With regard to flooding, paragraph 3.74 has been amended to also refer to sea level rise.

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		recognises this distinction, there is risk that provisions for flooding could be too liberal or too conservative in areas affected by tidal water.	
25315361	SA Report	There appears to be no facility to comment upon the 'SA Framework' section which follows. I have the following comment. SA Objectives 3 and 4 should have something to say about broadband connectivity and quality. The sub objectives of SA 5 should address the human habitat and its balance with the wildlife habitat. There may be instances where an improved human habitat can be achieved at the expense of the local wildlife habitat and under some circumstances this could be acceptable if biodiversity is improved by accountable and verifiable biodiversity offsets elsewhere in the Borough.	The SA Framework does not take into consideration Broadband connectivity and quality because it is considered a very localised issue, the status of which can change very quickly. The Government has several programmes in place with the aim to increase speeds and access to Broadband for homes and businesses, and it is likely Broadband connectivity may change over the plan period.
42832705	SA Report	For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: to achieve SA 2. it needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use (SA10); additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat (SA 5 and SA 6) through disruption of wildlife habitats and interruption of darkskies environments; the scale of the developments will materially impact what has been described in the East Malling Conservation Study as an areas of Unspoilt beauty and would disturb the distinct, historic characters of East Malling and West Malling villages. Regarding SA 11 and 12: Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity). Regarding SA 14: Of the proposed developments only a very small proportion are affordable to young buyers in the local demographic	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, give consideration to the landscape and what effects development will have on the landscape, under SA objective 6: landscape and townscape.</p> <p>Biodiversity is addressed under SA objective 5: biodiversity and geodiversity. Information on how sites have been appraised against this objective is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p>
42387809	SA Report	Nowhere in the Quantum Options SA is a mention of the climate change effects of household energy use which would be a big negative for either option with no upside at all but obviously greater for Option B. Water is only mentioned in terms of quality. Water resources in the South East are already heavily utilised and Climate Change is expected to reduce rainfall and hence water recharge. This will be exacerbated by further increase in impermeable surfaces which increase runoff rates at the detriment of groundwater recharge to our major aquifers and hence longer term decline in river flows and extractable water volumes. Any building will have a negative effect with no upside and Option B will cause greater problems than Option A because of covering a larger area and causing a greater demand.	<p>Household energy use can increase CO₂ emissions. SA Objective 10 seeks "To reduce greenhouse gas emissions so as to minimise climate change". The quantum options have been appraised against this objective, with Option A receiving a mixed minor positive and minor negative effect and Option B receiving a mixed significant negative and minor positive effect. Text has been added to the commentary in paragraph 4.8 to explicitly refer to household energy use.</p> <p>With regard to water, reference is made to water resources throughout the SA. Paragraph 3.62 states "The new Local Plan also offers an opportunity to ensure appropriate mitigation, including SUDs, is required as part of proposed development to mitigate any potential impacts on water resources".</p>

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42436577	SA Report	<p>This section muddles cause and effect of the suggested actions - at 4.6 it is not necessary to have more houses to improve the health and wellbeing provision. All new development is likely to make existing shortfalls worse. The improvements to the infrastructure is needed now, not as part of further growth in the numbers of houses. At 4.8 the AQMA improvements should be delivered to benefit the existing local residents who are suffering - adding more houses can only make things worse - let's fix the problems now, not wait for further development. Car use is high because there are limited alternative means of transport - better still would be closer facilities as most people would prefer to be within walking or cycling distance of work, schools, shops and doctors.</p>	<p>The purpose of the SA is to appraise the spatial strategy, policies and site options contained within the Local Plan and the reasonable alternative options.</p> <p>Paragraphs 4.6-4.10 provide an appraisal of the two quantum options. Paragraph 4.6 is not stating that it is necessary to have more houses to improve health and wellbeing provision, rather it is stating that with increased growth comes a requirement for an increased level of service provision. The two quantum options would provide the critical mass needed to support/fund the provision of health and wellbeing related infrastructure. Therefore, they both receive a minor positive effect against SA objective 2: services and facilities. The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities. Therefore, the minor positive effect for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in health and other services and facilities becoming overloaded.</p> <p>Paragraph 4.8 explains that new housing growth in the borough is likely to result in increased transport movements, a significant proportion of which are likely to be via private car. As such, both quantum options are identified as having negative effects in relation to SA objectives 10: climate change mitigation and 12: air quality. The negative effect for Quantum Option 2 is significant, as delivering growth beyond assessed needs has particular potential to cause increased congestion. The SA also acknowledges that the growth proposed under both options would provide investment into sustainable transport improvements, which may minimise the number of trips taken via private car within the Borough. As such, both options are also identified as having minor positive effects.</p>
42562465	SA Report	<p>The colour coding of the summaries and the + / - / ? marks are completely unclear and have no legend or explanation as to what they mean and how they can be compared.</p>	<p>Table 2.1 in the Interim SA Report provides a key to the symbols and colour coding used in the SA. The PDF version of the Report available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template abides by WCAG 2.1 regulations to the highest standard (level AAA).</p>
42387809	SA Report	<p>I is unfortunate that large villages such as Leybourne are included in Options 4 and 5 as the few positive outcomes identified do not apply the the small villages and other rural area. For these areas there are no possible positive effects for SA 10 and SA 12. There is no prospect of any `sustainable infrastructure', there are no bus routes between most small villages now and no likelihood of any being introduced. Roads are frequently small lanes with insufficient room for vehicles to pass making it unsafe to cycle the lanes for transport reasons. There is</p>	<p>The spatial options have all been appraised in accordance with the SA Framework.</p> <p>As stated in paragraphs 4.15 and 4.16 of the Interim SA Report, Options 4 and 5 would focus development within the urban areas, rural service centres and other rural settlements as identified in Core Strategy Policies CP11, CP12 and CP13. Leybourne forms part of the Medway Gap Urban Area.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		no prospect of cycle lanes, and people would not choose to cycle on muddy dark lanes, and distances to shops, schools etc plus the road danger make walking no an option except for leisure. So any development would lead to the need for probably 2 cars per household which gives strong negative effects on SA10 and 12 plus making it unlikely that new developments would contain much affordable housing as those in need of it could not afford the transport costs.	
42052833	SA Report	<p>We do not agree with the findings of the strategic policy option assessments as set out in table 5.1 in the Sustainability Report as they relate to site 59604 at Addington. We would comment as follows: SA2: Disagree. Expanding the settlement of Addington would allow for new facilities and services to be provided to the benefit of new and existing residents. SA5: Disagree. The land is pasture and is hemmed in between the A20 and the railway. Its development would have a negligible affect upon biodiversity and geodiversity. Indeed, its development and the implementation of a comprehensive landscaping scheme could well enhance biodiversity. SA6: Disagree. The land is poor pasture and is hemmed in between the A20 and the railway. Its development would have a negligible effect upon the boroughs landscape. Indeed, through judicious landscaping it could improve it! SA7: Disagree. The development of the site would not impact upon cultural resources. The nearest listed building, Milestone is more than 500m away. The Addington Conservation Area is more than 700m away and the ancient monuments at Addington Long Barrow are more than 1200m away. SA9: Disagree: The site comprises poorly managed pasture. It is hemmed in by the A20 to the north and the railway line to the south. It does not form part of a larger agricultural holding. The land to the west is in residential use whilst to the east is woodland. SA13: Disagree. The land is hemmed in between the A20 and the railway. It is too small a site to be valuable for mineral exploitation.</p>	<p>Table 5.1 in Chapter 5 of the Interim SA Report presents the likely effects of each reasonable alternative development site option against each of the fourteen SA objectives. Chapter 4 of the Interim SA Report presents the likely effects of each strategic policy option.</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59604 receives a significant negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band.</p> <p>The site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it is within 250m of three areas of Ancient Woodland. The effect is recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Additionally, the potential impacts on biodiversity and geodiversity would instead be determined once more specific proposals were developed and submitted as part of a planning application.</p> <p>The site receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located near any settlements in rural locations. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development. This is a 'policy-off' appraisal and so it does not take into consideration mitigation (e.g. landscaping). This ensures all sites are appraised on a consistent basis.</p> <p>The site receives a significant negative effect in relation to SA objective 7: heritage, as it is located within 250m of two heritage assets (Oast Southwest of Brook House and Mesolithic flint lithic implement), as recorded in the Kent Historic Environment Record. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>The site receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield and contains a significant proportion (more than or equal to 25%) of Grade 3 agricultural land. The effect is recorded as uncertain, as it is unknown whether the Grade 3 agricultural land is Grade 3a (high quality) or 3b (not classed as high quality).</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			The site receives a minor negative effect in relation to SA objective 13: material assets and waste, as it is within a Minerals Safeguarding Area. The effect is recorded as uncertain, as the actual effect will depend on whether the site would offer a viable opportunity for minerals extraction, and whether it would be possible for prior extraction to occur before the site is developed.
42643873	SA Report	The sustainability objectives completely ignore the protection of Green Belt Land. There should be an objective to avoid the loss of Green Belt land.	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.
42213665	SA Report	The Interim Sustainability Appraisal Report is comprehensive and based on sound methodology. I am hopeful that it will be successful in enabling sound decisions to be made in relation to the development of the Local Plan and each decision made in relation to proposed developments during its currency. I also hope that the key issues identified will continue to be addressed to the standards referred to and not be undermined due to political or economic pressures being applied as time passes.	Support noted.
42807617	Annex 1	Site 59808 has been incorrectly assessed against a number of SA objectives. SA Objective 2: The site has been incorrectly given a Fair Accessibility Band and a minor negative score within the corresponding SA Objective. Based on the methodology within the Urban Capacity Study (p16-17), a total percentage of 43.5%, would place the site within the 'Good' band for accessibility. SA Objective 5:- The site relates to a group of fields containing semi-improved grassland. The tree belts are limited to the periphery of the site, where the trees would benefit from active management relating to non-native species and trees with poor health conditions. Given the extent of Berkeley's land holding it may be possible to conserve and enhance the biodiversity of the site, achieving a net gain through the active management of the tree belts, and additional planting within Berkeley's retained land in the wider land holding. Berkeley therefore would suggest that the SA score of uncertain significant negative is overly precautionary.SA Objective 7: A uncertain significant negative score, due the sites setting within 250m of a heritage asset, is overly precautionary. The nearest heritage assets within Coldharbour Lane (The White House), Berkeley's own Oakhill House development, and Hildenborough Conservation Area are not visible from the site, and would otherwise be screened by committed development. SA Objective 8: The SA states that more than 25% of the site is within Flood Zone 3 and/or is within an area with a 1 in 30 year risk of surface water flooding. The entire site is however located within Flood Zone 1, and therefore is at the lowest risk of flooding. Berkeley's initial Flood Risk Assessment prepared by WSP acknowledges that there is a small area within a 1 in 30 year risk of surface water flooding. However, it is noteworthy that this area is under 25% of the site, relates to existing drainage attenuation and depressions in the land, is located in an area of the site that is adjacent to an area	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, although 43.5% of the site falls within the 'Good' accessibility band, the remainder of the site falls within the 'Fair' accessibility band. As SA utilises a precautionary approach, the site is recorded as falling within the 'Fair' accessibility band and therefore receives a minor negative effect in relation to SA2.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site has been appraised in line with the site assessment criteria. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 7: heritage, it is correct for the SA to have utilised a precautionary approach.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. Further to this, the site contains a water body of watercourse or falls within Source Protection Zone 1. The 'policy-off' appraisal of the site in this section of the SA does not take into consideration mitigation, rather it is based on the physical constraints of the site. This ensures all sites are appraised in a consistent manner.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>already the subject of land form changes (Applications 20/02441/FL and 22/01753/F), and can otherwise be mitigated and re-compensated as part of a detailed drainage design strategy and modelling. SA Objective 9: The SA assessment of Objective 9 ranks the site as an uncertain significant negative. However, the site is not currently in productive agricultural use and is landlocked without direct access other than through Berkeley's wider Oakhill House estate, via third party land or the creation of an access onto Woodfield Avenue or Tonbridge Road, as part of a development. Due to known soil conditions within the Oakhill House development site, the majority of the site is expected to be of a moderate quality in Subgrade 3 and in part will be impractical to farm due to land form changes (Applications 20/02441/FL and 22/01753/F).</p>	<p>The Strategic Flood Risk Assessment (SFRA) which informed this SA objective will be updated. Therefore in the next iteration of the SA Report the site appraisals will reflect more up-to-date flood risk data.</p> <p>With regard to SA objective 9: soils, the site has been appraised in line with the site assessment criteria. The site comprises greenfield land, a significant proportion of which is classified as Grade 3 agricultural land. It is irrelevant whether the site is currently in agricultural use or not.</p>
42203041	Annex 1	<p>Individual site reference number: 59714Berkeley is concerned about the SA ratings given to this site. Whilst some scoring may be due to differing judgements applied, there appear to be factual inconsistencies in the assessment, most notably in terms of accessibility where the site is rated as 'fair' (SA Objective 2) and in relation to flood risk (SA Objective 8).SA Objective 2: Berkeley suggests that the above site, relating to land off Offham Road, West Malling, has been incorrectly assessed within the Urban Capacity Study, which has led to its rating within the Fair Accessibility Band and a minor negative within the corresponding SA Objective. Despite uncertainty regarding how the score is calculated for the Bus Stop Service Level, a lowest possible score of 0.4 still takes the site's cumulative score to a total of 10.4. This is a total percentage of 61%, a result that would place the site within the 'Very Good' band for accessibility. SA Objective 5: The site is a field with short grass that contains a small tree belt consisting of approximately a dozen small trees. Other than the site being undeveloped it is unclear as to why the site is considered a 'green infrastructure asset'. The site is not currently publicly accessible and contains no habitat of exceptional biodiversity value. In addition, it may be possible to conserve or even enhance the biodiversity of the site through the design of the landscaping and the new homes. Therefore, the uncertain significant negative assessment should be reconsidered.SA Objective 6: The scoring of uncertain minor negative from the development of the site for landscape and character should instead be negligible. The site is well enclosed, with development to the north and east of the site and further development bordering the site to the south and west. The site is therefore more closely associated with the existing built form of West Malling, effectively sitting within its confines, than it is with the open countryside further out to the south and west of the site.SA Objective 7: Berkeley suggests that the method of scoring the site with an uncertain significant negative due to the site's setting within 250m of a heritage asset may be overly cautious. The key views of these heritage assets are from St. Leonard's Street and the centre of the town. Views between the site and the St. Mary's Church are limited. There are few viewpoints into the Conservation Area from neighbouring properties due to the height of the surrounding vegetation and the relatively recent development at the back of Douces Manor screens the listed</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, this comment relates more specifically to the Urban Capacity Study (July 2022) than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the green infrastructure asset the site proforma is referring to is an area of woodland overlapping the south eastern edge of the site. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 6: landscape, the site has been appraised in line with the site assessment criteria. The site is considered to be on the edge of the settlement of West Malling.</p> <p>With regard to SA objective 7: heritage, it is correct for the SA to have utilised a precautionary approach. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives a mixed significant negative and negligible effect. The significant negative effect is as a result of the site falling within an area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the site not containing a water body or watercourse, or falling within a Source Protection Zone.</p> <p>With regard to SA objective 9: soils, the site has been appraised in line with the site assessment criteria. The site comprises greenfield land, a significant proportion of which is classified as Grade 3 agricultural land. It is irrelevant whether the site is currently in agricultural use or not.</p> <p>With regard to SA objective 13, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>building. Berkeley has previously commissioned a Heritage Assessment, which has concluded there will be no material harm to any of the designated heritage assets or non-designated historic buildings resulting from the development. Additionally, the proposals will be designed sensitively and will have a neutral impact on Sub Areas C and E of the West Malling Conservation Area, meaning the site will not unacceptably impact on the significance or setting of St. Mary's Church. SA Objective 8: Berkeley suggests that the result of this Objective, classified as both a significant negative / negligible effect, may be incorrect. The SA states that more than 25% of the site is within Flood Zone 3 and/or is within an area with a 1 in 30 year risk of surface water flooding. The EA flood risk maps for planning show that in terms of fluvial flooding the entire site is located within Flood Zone 1, and therefore is at the lowest risk of flooding. Berkeley's initial Flood Risk Assessment prepared by WSP acknowledges that there is a small area within a 1 in 30 year risk of surface water flooding, although this area is under 25% of the site. Any issues regarding surface water flooding can be effectively mitigated through the incorporation of sustainable urban drainage systems within the development. SA Objective 9: The site is located to the south-west of West Malling and consists of one field, comprising grass pasture, currently unused for agricultural purposes. The SA assessment of Objective 9 ranks the site as an uncertain significant negative. However, the site is not currently in productive agricultural use and realistically cannot be of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed. It would not be suitable for modern agricultural vehicles to farm for crops and the size of the field would mean that animals could only be grazed temporarily before having to be moved on regularly, which is not practical. SA Objective 13: The site is classed as an uncertain minor negative with regards to protecting material assets and minimising waste. The SA reports that this is due to uncertain effects as to whether the site can viably offer mineral extraction. However, the site is likely too small to viably support mineral extraction. Any extraction prior to development would likely have adverse amenity impacts for residents living adjacent to the site.</p>	<p>uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p>
42831905	Annex 1	<p>Site 59842</p> <p>SA Objective 2</p> <p>Regarding Sustainability Objective 2 "To improve equality and access to community facilities and services", this requires reference to Appendix D of the Interim Sustainability Appraisal (SA) which provides insight as to Accessibility Bandings (in Table D.1). This refers to the methodology "devised by TMBC" and "explained in detail in the Urban Capacity Study" (UCS)[1]. This explanation occurs on pg15-18 of the UCS and indicates a maximum possible score for any site of 17 points, with UCS Table 5 providing the same bandings as SA Table D.1. The latter omits to explain that the banding is based on percentages, however.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, the site has been appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is recorded as having an uncertain significant negative effect because unlike sites 59647 and 59686, it contains an existing green infrastructure asset that could be lost as a result of new</p>

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		<p>It is clear from this that any site scoring 3.6 points or more[2] would be of "Fair" accessibility, while any achieving 7.0 points or more[3] would be "Good" and any exceeding 10.4pts or more[4] would be "Very Good".</p> <p>Hadlow is a Rural Service Centre in the draft plan, thus all sites at that settlement start from a base of 4 points (by reference to UCS Table 4).</p> <p>We refer you to the promotion document for site 59842. WSP, appointed by the promoter, confirm that the site is within 700 metres of Hadlow village centre, a walking distance of less than 10 minutes. The centre has a range of facilities, including (within 800m walking distance):</p> <table><tr><td>Facility</td><td>Point Score from UCS Table 4</td></tr><tr><td>Primary School</td><td>1 pt</td></tr><tr><td>GP surgery</td><td>1 pt</td></tr><tr><td>Dentist</td><td>0.5 pt</td></tr><tr><td>Pharmacy</td><td>0.5 pt</td></tr><tr><td>Post Office</td><td>0.5 pt</td></tr><tr><td>2x Convenience retail</td><td>0.5 pt</td></tr><tr><td>Two Brewers PH</td><td>0.5 pt</td></tr></table> <p>Thus, even without considering transportation connections, the score for site 59842 exceeds that required for "Good Accessibility". Accordingly, the SA Objective result for Site 59842 should be at least the same as that for 59647, 59635 and 59686, which are all assessed at this level and are "Neutral" (0).</p> <p>However, there is also a bus stop immediately outside the site on Maidstone Road (1pt) from which 3-4 services/hr operate through the week. This frequency constitutes a "Very Good" service, within the context of UCS Table 4a (for a further 1.6 pts).</p> <p>Overall, this assessment indicates Site 59842 would score at least 11.1 pts or 65.3% of the available 17 points. This would place it, comfortably, in the "Very Good" Accessibility range, by reference to TMBC's own scoring methodology.</p> <p>Other sites with "Very Good" Accessibility include withdrawn allocations LP25d (SA Site 59391) and LP25e (SA Site 59392), with these sites afforded a "Minor Positive" (+) assessment.</p> <p>This SA objective score for Site 59842 should therefore be amended to "Minor Positive" (+).</p> <p>SA Objective 5</p> <p>There is a discrepancy within this objective "To protect and enhance biodiversity and geodiversity" between the assessment for Site 59842 and that for Sites 59647 and 59686. All 3 sites retain the same wording: "The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site";</p>	Facility	Point Score from UCS Table 4	Primary School	1 pt	GP surgery	1 pt	Dentist	0.5 pt	Pharmacy	0.5 pt	Post Office	0.5 pt	2x Convenience retail	0.5 pt	Two Brewers PH	0.5 pt	<p>development. Specifically, it contains some areas of thick vegetation/woodland.</p> <p>With regard to SA objective 7: heritage, the SA acknowledges that the site is within 250m of a heritage asset and has therefore been appraised in line with the site assessment criteria.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 8: water because it is within an area with a 1 in 30 year risk of surface water flooding, in addition to containing a watercourse and slightly overlapping a water body on its north eastern edge. The objective relates to flooding, as well as water quality. Although the respondent notes that the watercourse does not represent a significant constraint to delivery, this is a 'policy-off' appraisal that does not take into consideration mitigation. The policy-off appraisal ensures all sites are appraised consistently.</p> <p>With regard to SA objective 9: soils, a significant proportion of the site comprises Grade 3 agricultural land. Therefore, it receives a significant negative effect. The effect is recorded as uncertain, as it is unknown whether the site comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land. As SA utilises a precautionary approach and it is unknown whether the site comprises high quality land or not, the uncertain significant negative effect is considered appropriate.</p> <p>In the next iteration of the SA Report the site assessment criteria for SA objective 9 will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC sometimes provides further information on the quality of agricultural land, but only covers specific areas of the borough.</p>
Facility	Point Score from UCS Table 4																		
Primary School	1 pt																		
GP surgery	1 pt																		
Dentist	0.5 pt																		
Pharmacy	0.5 pt																		
Post Office	0.5 pt																		
2x Convenience retail	0.5 pt																		
Two Brewers PH	0.5 pt																		

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Nonetheless, Site 59842 is assessed as “Significant Negative” (--) while Sites 59647 and 59686 are “Minor Negative” (-).</p> <p>If this derives from the presence of a Tree Preservation Order[5] across site 59842 it is clear from even a cursory review of the plan within the TPO, relative to an aerial photograph, that the A1 area within the TPO is wholly unreflective of the position on the ground. There is no justification for a difference between SA conclusions for Site 59842, compare to those for Sites 59647 and 59686, and this SA objective score for Site 59842 should therefore be amended to “Minor Negative” (-).</p> <p>SA Objective 7</p> <p>This objective “To protect and enhance the cultural heritage resource” has been misapplied in relation to Site 59842. The site has been assessed as “Uncertain Significant Negative” (--?) due to being located within 250m of a heritage asset.</p> <p>This assessment fails to acknowledge that there is only a single, Grade II Listed Building within 250m of the site. That building is James House[6], which lies on the opposite side of Maidstone Road approximately 230m away from the proposed entrance to the Site. James House is wholly obscured by intervening built form and vegetation.</p> <p>In contrast, Sites 59647 and 59635 have at least 45 Listed Buildings within 250m, including the Grade 1 Hadlow Tower and several Grade II* listed buildings. Furthermore, both these sites, together with 59686 and 59853, are demonstrably wholly visible from the top of Hadlow Tower[7]. Accordingly, these 4 Sites must be within the setting of this notable structure.</p> <p>This SA objective score for Site 59842 should therefore be amended to “Neutral” (0)</p> <p>SA Objective 8</p> <p>There is a discrepancy within this objective “To protect and enhance the quality of water features and resources” between the assessment for Site 59842 and that for Site 59647 compared with those for Sites 59635 and 59686.</p> <p>Both sites 59842 and 59647 retain the same wording: “The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.”</p> <p>Nonetheless, Site 59842 is assessed as “Significant Negative” (--) while Site 59647 is assessed as “Neutral” (0). As this same “Neutral” (0) categorisation has been applied to Site 59635 and Site 59686 but those sites are in Flood Zones 1 and 2 respectively, the assessments for both Sites 59842 and 59647 are incorrect, and should be “Minor Negative” (-).</p> <p>In the case Site 59842, it is clear from efforts deriving from the promotion to TMBC that the watercourse running through the site</p>	

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		<p>does not represent a significant constraint to delivery, and would not preclude allocation.</p> <p>This SA objective score for Site 59842 should therefore be amended to "Minor Negative" (-).</p> <p>SA Objective 9</p> <p>This objective "To conserve and enhance soil resources and guard against land contamination" has been misapplied in relation to Site 59842. The site has been assessed as "Uncertain Significant Negative" (-?) as it is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 3 agricultural land.</p> <p>However, this same categorisation has been applied to Sites 59647, 59635 and Site 59686, yet all these include higher grade agricultural land (Grade 1 & 2). It is unreasonable for the assessment to 59842 to be more onerous in this regard, and this SA objective score for Site 59842 should be amended to "Minor Negative" (-).</p> <p>A summary showing how the assessment should be amended is included within our letter sent via email.</p> <p>SITE 59647</p> <p>SA Objective 8</p> <p>There is a discrepancy within this objective "To protect and enhance the quality of water features and resources" between the assessment for Site 59647 and that for Sites 59842, compared with those for Sites 59635 and 59686.</p> <p>Both sites 59647 and 59842 retain the same wording: "The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding."</p> <p>Site 59647 is assessed as "Neutral" (0). As this same "Neutral" (0) categorisation has been applied to Site 59635 and Site 59686, but those sites are in Flood Zones 1 and 2 respectively, the assessments for both Sites 59842 and 59647 are incorrect, and should be "Minor Negative" (-).</p> <p>A summary showing how the assessment should be amended is included within our letter sent via email.</p> <p>SITE 59635</p> <p>SA Objective 5</p> <p>There is a discrepancy within this objective "To protect and enhance biodiversity and geodiversity" between the assessment for Site 59635 and that for Sites 59647 and 59686. All 3 sites are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site".</p> <p>Nonetheless, Site 59635 is assessed as "Neutral" (0) while Sites 59647 and 59686 are "Minor Negative" (-).</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>There is no justification for a difference between SA conclusions for Site 59635, compared to those for Sites 59647 and 59686, and this SA objective score for Site 59635 should therefore be amended to “Minor Negative” (-).</p> <p>A summary showing how the assessment should be amended is included within our letter sent via email.</p> <p>SITES 59853 and 59857</p> <p>SA Objective 5</p> <p>There is a discrepancy within this objective “To protect and enhance biodiversity and geodiversity” between the assessment for Site 59853 and that for Sites 59647 and 59686. All 3 sites are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site”.</p> <p>Nonetheless, Site 59853 is assessed as “Neutral” (0) while Sites 59647 and 59686 are “Minor Negative” (-).</p> <p>There is no justification for a difference between SA conclusions for Site 59853, compared to those for Sites 59647 and 59686, and this SA objective score for Site 59853 should therefore be amended to “Minor Negative” (-).</p> <p>A summary showing how the assessment should be amended is included within our letter sent via email.</p> <p>[1] SA Appendix D, para D.4</p> <p>[2] 21% of 17</p> <p>[3] 41% of 17</p> <p>[4] 61% of 17</p> <p>[5] TPO 83/10082/TPO, issued 1983</p> <p>[6] https://historicengland.org.uk/listing/the-list/list-entry/1070455?section=official-list-entry</p> <p>[7] By reference to photographs that are publicly available from TripAdvisor, taken during the period when the Tower served as a holiday let.</p>	
38330369	Annex 1	<p>These sites are within Hadlow parish. While Hadlow Parish Council agrees with many of the TMBC assessments in Annex 1, we contest the rating given in the following instances: Site ref. 59601 SA Objective 1: We believe the rating should be amended to uncertain minor positive (+?) as Hadlow medical centre fully subscribed. SA Objective 6: The rating should be amended to significant negative (--) The area is Green Belt and is currently the attractive first impression that</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>drivers/visitors will have of the village as they approach Hadlow. Any development would have a significant negative impact on views of Hadlow Tower and the conservation area of the village. SA Objective 7: Should be amended to significant negative (--) As above: any development would have a significant negative impact on views of Hadlow Tower and the conservation area of the village on the approach from Tonbridge. SA Objective 8: Should be uncertain minor negative (-?). The site, along with other sites north of the A26, helps absorb flood water at times of run-off from the fields down from West Peckham parish. SA Objective 10: Should be minor negative (-). There is no footpath or cycle path linking to Hadlow village and the A26 is a fast road and dangerous for pedestrians at that point. The likelihood of any residents using any form of transport other than private car is negligible. And due to the lack of parking space in the village, residents of any developments on this site would be more likely to use shops further afield with consequent increase in car use. Site ref. 59637 SA Objective 1: Disagree with the possible rating of (++). Should be negligible (0)/Uncertain significant negative (--?) Any development on the site would have a negative effect for existing users of the footpath on their enjoyment of the countryside. SA Objective 6: Should be significant negative (--). The site is Green Belt with a well-used footpath running across it. For visitors to the Cemetery next to the site, it would adversely impact cherished views across the existing countryside to the Grade I listed Hadlow Tower. SA Objective 7: Should be significant negative (--), the site affects the setting of the cemetery next to it, with its Grade II listed war memorial. SA Objective 8: Should be just Significant negative (--). The site is prone to flooding and run-off from any development could affect the health of the nearby pond. SA Objective 10: Should be minor negative (-). There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge. Site Ref. 59638 SA Objective 1: Should be minor positive (+): the junction of the access road with the A26 is dangerous due to visibility and the speed of traffic using the A26. SA Objective Should be significant negative (--): the location of the site next to the pond would impact the quality of the water in the pond and the wildlife that use it. SA Objective 6: Should be significant negative (--): The site is Green Belt. Any development would adversely impact the rural setting of the pond, currently with trees and field behind it. SA Objective 10: Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge. Site Ref. 59647 SA Objective 1: Should be Uncertain minor positive (+?): the Hadlow medical centre is over-subscribed with no room for expansion. SA Objective 6: Should be significant negative (--): The site is Green Belt. Traffic from any development of that size would cause unacceptable congestion on Court Lane and at the narrow junction with the A26. SA Objective 10: Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge. Site Refs. 59659 & 59686 SA Objective 1: Should be Uncertain minor positive (+?): the Hadlow medical centre is over-subscribed with no room for expansion. The junction of the proposed access road with</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Sites 59601, 59686 and 59776 have therefore been appraised in line with the site assessment criteria.</p> <p>Sites 59637 and 59776 have also been appraised in line with the site assessment criteria. The sites are located within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility. Therefore, they receive a significant positive effect. In the next iteration of the SA Report the GIS analysis will be refined so that sites that slightly overlap an open space will not be picked up as containing that open space. As a result, these effects will no longer be coupled with uncertain significant negative effects.</p> <p>Site 59859 receives a mixed significant positive and uncertain significant negative effect in relation to SA objective 1 because while it is located within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility, it contains an open space that could be lost as a result of development, although this is uncertain.</p> <p>Site 59806 received a mixed uncertain significant negative and minor positive effect in relation to SA objective 1. The uncertain significant negative effect is as a result of the site slightly overlapping an open space. As mentioned already, in the next iteration of the SA Report the GIS analysis will be refined so that when a site slightly overlaps an open space, it is not picked up as containing that open space. As a result, the site will receive a minor positive effect only in relation to this objective, as it is within 800m of an existing area of open space and walking path.</p> <p>Sites 5981, 59747 and 59846 receive a minor positive effect in relation to SA objective 1 because they are within 800m of either an existing healthcare facility or an existing area of open space/walking and cycling path/play area/sports facility (but not both).</p> <p>Sites 59842 and 59834 receive a significant positive effect in relation to SA objective 1 because they are within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59858 receives an uncertain significant negative effect because it contains an existing green infrastructure asset (thick vegetation and woodland) that could be lost as a result of new development.</p> <p>With regard to SA objective 6: landscape, the sites referenced by the respondent have been appraised in line with the site assessment criteria. Some errors have, however, been identified regarding whether sites are within, on the edge of or not located near any settlements in a rural location. This is because the GIS analysis identified some sites as not located near any settlements in a rural location even though they are on the edge of a settlement, as there</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the A26 is dangerous. SA Objective 6: Should be minor negative (-) The site is Green Belt. SA Objective 10: Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge. Site Ref. 59776 SA Objective 1: Should be significant negative (--): Carpenters Lane is unsuitable for the amount of traffic that would be generated by the development: this would impact the well-being of local residents. The junction with the A26 would be dangerous with the increased traffic turning on to the main road. The local medical centre is over-subscribed with no room for expansion. SA Objective 6: Should be significant negative (--). The site is Green Belt. Any development would adversely impact the setting of Williams Field, the main open space in the village. SA Objective 10: Should be significant negative. Minor negative(-)/significant negative (-) depending on the exit points from the development. There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge. Site Ref. 59795 SA Objective 6: Uncertainty as to location of site. If it is not the brownfield site as claimed by TMBC, but the field with trees next to it as shown on the TMBC map, the site would be Green Belt. SA Objective 9: Uncertain whether site is brownfield land. The TMBC map shows the site to be the field with trees, and not the brownfield site next to it. Site Ref. 59811 SA Objective 1: Should be significant negative (-) due to the adverse effect on the well-being of Hadlow residents from a large amount of increased traffic. Hadlow is the nearest large village and is where much of the traffic from the site would access the A.26. This would most likely lead to much-increased congestion in Carpenters Lane and at the junction with the A26 which already sees queues of traffic exiting onto the main road. SA Objective 6: Should be Significant negative (-). The site is Green Belt. It forms part of the parkland of historic Oxon Hoath estate and is crossed with footpaths affording sweeping views across the countryside to the Grade I listed Hadlow Tower and beyond. SA Objective 7: Should be Significant negative (-). The site almost completely surrounds the historic grade II listed Oxon Hoath and its gardens and parkland. SA Objective 10: Should be significant negative (-). No nearby public transport and no cycle paths to allow safe cycling means that all road journeys will be by car. Site Ref. 59853 SA Objective 1: Should be Uncertain significant negative (-?): The increase in traffic from the site and the congestion caused would have an adverse effect on the well-being of residents of Court Lane. Neither Court Lane nor Victoria Road are suitable to take a large amount of increased traffic. It would also cause congestion and long delays at the narrow junction with the A26. There is inadequate infrastructure to enable safe walking from the site to Hadlow to access village facilities, although a footpath could be added as part of a development. However, the distance from the village centre would lead many residents to use their cars rather than walk. There is no infrastructure to allow safe cycling around Hadlow and further to Tonbridge. Hadlow medical centre is over-subscribed with no room for expansion SA Objective 9: Should be minor negative (-). Only about 50% of the site is brownfield. The rest is grass with some under agricultural cultivation. SA Objective 10: Should be minor</p>	<p>was no percentage overlap with the settlement boundaries. Therefore, in the next iteration of the SA Report, some of the effects against this objective will be updated to accurately reflect whether sites are on the edge of or not located near any settlements in a rural location. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. All adverse effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 7: heritage, all effects against this SA objective are recorded as uncertain, as the actual effect is dependent on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, sites 59601, 59859, 59842 and 59834 are recorded as having an uncertain significant negative effect because they are either entirely or significantly within Flood Zone 3 and/or a 1 in 30 year risk of surface water flooding. Further to this, they contain a water body or watercourse, or fall within or partially within Source Protection Zone 1. The effect is recorded as uncertain, as effects resulting from Source Protection Zones and water bodies are uncertain.</p> <p>Site 59637 is recorded as having a mixed significant negative and negligible effect against this objective. The significant negative effect is as a result of the site falling within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the site not containing a water body or watercourse, or falling within a Source Protection Zone.</p> <p>With regard to SA objective 9: soils, TMBC informed LUC that site 59853 comprises brownfield land.</p> <p>With regard to SA objective 10: climate change mitigation, the sites have been appraised in line with the site assessment criteria. Sites 59601, 59637 and 59853 are more than 800m from a railway station but within 400m of a bus stop. Therefore, they receive a minor positive effect. Sites 59747, 59806 and 59846 are more than 800m from a railway station and more than 400m from a bus stop and cycle route. Therefore, they receive a minor negative effect.</p> <p>A map showing the location of site 59795 can be found at the top of its proforma. Although the site may not look as though it comprises brownfield land, TMBC has informed LUC that it does.</p> <p>Site 59659 is a duplicate of 59686. 59686 is the definitive reference number for this site.</p> <p>Site 59865 is a duplicate of 59834. 59834 is the definitive reference number for this site.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>negative: most of the site is more than 400m from a bus stop. Site Ref. 59859 SA Objective 1: Should be just Uncertain significant negative (--?): the access on to Carpenters Lane is on a dangerous bend with poor visibility. SA Objective 5: Should be Significant negative (--): the site runs alongside the river Bourne and would impact the biodiversity of the river, particularly due to flooding of the site. SA Objective 8: Should be just Significant negative. The site is on the flood plain of the river Bourne; it is prone to flooding and is in Flood Zone 3. Any run-off will adversely impact the quality of water in the Bourne.</p> <p>Site Ref. 59842 SA Objective 1: Should be Significant negative (--): The size of the development would adversely impact the well-being of Hadlow residents as traffic from the development would increase congestion in the village centre. Hadlow medical centre is fully subscribed with no room for expansion. SA Objective 6: Should be Uncertain Significant negative (--?): The site lies between two well-used footpaths and any development would adversely impact walkers' enjoyment of the countryside. SA Objective 8: Should be Significant negative (--): The site is prone to flooding, but it also has a valuable role in absorbing run-off of excess water during heavy rainfall from the fields north of the A26 towards West Peckham parish, thereby helping prevent flooding of Hadlow village. Development of the site could lead to serious flooding of homes in the village - particularly along Maidstone Road. There are two streams crossing the site, ultimately feeding into the river Bourne. Any development would therefore affect the quality of the water in the streams and the Bourne. Site Refs. 59834 & 59865 SA Objective 1: Should be minor negative (-): Any development on the site would have a negative effect for the many users of the footpath (MT160) on their enjoyment of the countryside. Medical facilities are remote from most of the site.</p> <p>SA Objective 8: Should be just Significant negative (--): development on the flood plain could exacerbate flooding further downstream. The following three sites are proposed for outside Hadlow Parish in the Maidstone direction, but their development would impact the village in similar ways to a lesser or greater extent depending on their size: Site Refs. 59747, 59806 & 59846 SA Objective 1: Should be Significant negative (--): The size of the developments, particularly the huge scale of 59806, would adversely impact the well-being of Hadlow residents as traffic from the developments would increase congestion through the village centre. No medical facilities nearby; Hadlow Medical Centre is the nearest, but is fully subscribed with no room for expansion SA Objective 6: Should be Significant negative (--): due to the loss of Green Belt, including woodland in 59806. SA Objective 10: Should be significant negative (--). No nearby bus stop and lack of cycle paths along the A26 (or A228) to allow safe cycling means that all road journeys will be by car. The following sites are outside Hadlow and all raise similar concerns for Hadlow Parish Council:mSite Refs. 59685 and 59689, 59693 & 59805 SA Objective 6 Should be a significant negative (--) for all the sites: the outward sprawl of Tonbridge towards Hadlow and its outlying hamlets, is contrary to TMBC's anti-coalescence aims as it threatens the individual identity of Hadlow.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
25315361	Annex 1	The following sites have been categorised as being within 800 metres of an existing health care facility. 59702, 59790, 59826, 59847. This is erroneous because the Phoenix Surgery in Burham and the nursing outpost in Eccles will be moved to Peters Village well before the new Local Plan comes into effect. In fact, once the medical facility is moved to Peters village then it will be inaccessible by public transport given the present bus service. This should be recorded as a significant negative for all sites in Eccles and Burham. For sites which are than 800m from a medical facility, there should be a clear distinction between those where the medical facilities can be reached by public transport and those where it cannot. Given that medical facilities will not be accessible by public transport from Eccles, all sites in Eccles should be categorised as being in the Poor Accessibility Band under SA Objective 2. This covers the sites above plus the following. 59702 59666 59826 59790 59841 59768 59831 Although there are two buses a week (Tuesdays and Thursdays), these travel from the new surgery to Eccles on the outward journey and from Eccles to the new surgery on the return journey.	<p>Although the Phoenix Surgery is proposed to be moved to Peters Village, the SA reflects what services and facilities are present at the time of assessment.</p> <p>Access to public transport is dealt with separately under SA objective 10: climate change mitigation.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
25315361	Annex 1	The following sites are classified for the purpose of SA Objective 4 as being within 400m of a bus stop. 59702 59666 59826 59790 The bus stop is served only by one bus on Tuesday and one on Thursday. This poor level of public transport cannot support regular employment on the designated sites.	SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.
25315361	Annex 1	The following sites are categorised as being within 400m of a bus stop for the purposes of SA Objective 10. 59702 59666 59826 59790 59841 59768 59831. A bus stop is only useful if it supports a bus service. During school holidays, there are only two buses per week to Maidstone: one on Tuesday and one on Thursday. The bus service is sufficiently poor that the designated sites should not be given any credit for their proximity to a bus stop. The two buses allow turnaround times of 90 mins and 150 mins respectively in Maidstone. This creates difficulties for people who wish to make appointments for eye tests, bank consultations or many other services. A villager recently had an appointment which ran late and it cost her a £17 taxi fare to return to the village. The pattern of bus service does not support hospital appointments nor the possibility of travel beyond Maidstone town centre. Given the latter limitations, all the above sites should be classified as within the Poor Accessibility Band under SA Objective 2. Although there are school buses during term term they are not at convenient times and in the morning they do not allow free travel with a bus pass. Furthermore, the travelling public would not wish to impinge upon the available capacity for school children. It cannot be assumed that new sites could support an enhanced bus service. The planning proposal for Peters village mooted a peak service of up to	<p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>The Interim SA Report states at paragraph D.27 "It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, but this cannot be assumed" [emphasis added].</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		two buses per hour, but the village is now being served by only two buses per week.	
42452545	Annex 1	<p>SITE 59746 COBLANDS NURSERY, TRENCH ROAD, TONBRIDGE TN11 9NG. Coblands Nursery is identified under reference 59746. The site was submitted as a suitable, available and deliverable housing site within the Call for Sites process. The UCS methodology assesses the potential yield taking account of constraints and local character and provides a broad brushed assessment of the site. As a consequence, the estimated yield was 255 dwellings. Having undertaken more detailed and refined analysis for the site, it can be demonstrated that the site can support around 320 dwellings. The Vision document accompanying this submission provides further details of a proposed development for around 320 units in support of this assessment. In respect to the site scoring in Annex 1 for the site, the following is submitted in response: SA Objective 1: To improve human health and well-being Minor positive (+)/Uncertain significant negative (--?). The site is within 800m of either an existing healthcare facility or an existing area of open space walking and cycle path / play area/ sports facility (but not both). The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on the exact scale, layout and design of development and whether these existing features are in fact lost to new development. COMMENT: The Site is not within an area of open space or accommodates an outdoor sports facility as it is entirely occupied by a commercial horticultural nursery. Compared to what exists presently – a closed private site – the proposed development is likely to include local equipped play areas and open space. The site is within 800m of an existing healthcare centre – Trenchwood Medical Centre which is run and managed by the Hildenborough and Tonbridge Medical Group. The site is also within 800m of several outplay play facilities for young and old – including Tonbridge Angels FC, Bowling Club, Cricket club and Play area (Darenth Avenue). Revised marking: SIGNIFICANT POSITIVE (++)</p> <p>SA Objective 2: To improve equality and access to community facilities and services Negligible (0). The site is placed within the Good Accessibility Band. NO CHANGE SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society. Uncertain significant positive (++?)</p> <p>The site is within 800m of an existing secondary school and a primary school. However, uncertainty exists as the effects will depend on there being capacity available at those facilities to accommodate new pupils. It is also noted that the provision of new residential development could stimulate the provision of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain. NO CHANGE SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough Negligible (0)/Negligible (0) The location of residential sites will not directly influence sustainable economic</p>	<p>We have responded to the estimated yield provided by TMBC, which was generated using a methodology agreed by the Council and applied to all sites.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an open space (Waveney Road Woods) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>In the next iteration of the SA Report, Trenchwood Medical Centre will be added and all sites affected updated.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is recorded as having an uncertain significant negative effect because it is located within 250m of an area of ancient woodland, which is also considered a green infrastructure asset. Development of the site could therefore have an adverse effect on this asset. The site is also recorded as containing a green infrastructure asset.</p> <p>The site is incorrectly recorded as containing an open space against SA objective 6: landscape and townscape. In the next iteration of the SA Report the site will not be identified as containing an open space.</p> <p>The site is also incorrectly recorded as not being located near any settlements, even though it borders Tonbridge. In the next iteration of the SA Report, the assessment will be updated to reflect this.</p> <p>With regard to SA objective 7: heritage, the site has been appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 8: water, the site is recorded as having an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. Further to this, it contains a water body. As such, the site is potentially at risk of polluting the water contained within this water body. Although the respondent has stated that water quality will be protected, this is a 'policy-off' appraisal of the site and therefore mitigation is not taken into account. This ensures all sites are appraised consistently.</p> <p>With regard to SA objective 13: material assets, the justification text for the uncertain minor negative effect explains that the effect is uncertain at it will largely depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>Any development of the Site would avoid locating built form which would affect flood storage such a land raising on land within flood zone 2 and 3. The site lies outside of the SPZ Zone 1, 2 and 3, but lies</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>growth or the delivery of employment opportunities. NO CHANGE SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain significant negative (--?). The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development. COMMENT: The site is currently used as a commercial horticultural nursery with a manufactured landscape utilising significant areas of hard landscaping to suit the business with extensive use of insecticides and pesticides associated with the business. The new development will expect to achieve an enhancement of the biodiversity and geodiversity of the site with biodiversity net gain through careful design of the development and improvement to the landscape, providing a variety of formal and natural habitats. Revised marking: Uncertain positive (+/?)</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?). The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. COMMENT: The site does not comprise designated open space and lies adjacent to the main settlement of Tonbridge. The site is used as a commercial nursery and due to the infrastructure and buildings associated with the use, is brownfield. New development will allow the landscape to be improved which will include the creation of new open space. Protected Woodland beyond the northern boundary will be protected with an opportunity for public rights of way through the woodland to be enhanced. Whilst any development alters the landscape of a location, the site is located on the edge of a settlement and this should be scored as a minor unknown negative Revised marking: Minor uncertain negative (-/?)</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource Uncertain minor negative (-?) The site is located between 250m-1km of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. COMMENT: Historic England record two heritage assets within 1km of the Site: 313 Shipbourne Road (Grade II listed): 0.9km from the centre of the site Latters Farmhouse Barn, Hilden Avenue (Grade II listed): 0.9km from the centre of the Site. Both properties are somewhat distant from the Site and neither property will be within sight of any development on the Site. Whilst the two Listed Buildings are within 1km of the site, any development on the Site will have no impact on their setting and contribution to local character. Revised marking: Negligible (0)</p> <p>SA Objective 8: To protect and enhance the quality of</p>	adjacent to a watercourse (Hilden Brook). During construction, protection of water quality will be carefully managed and monitored.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>water features and resources Significant negative (--) / Uncertain significant negative (--) The site is either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. COMMENT: The vast majority of the site falls within Flood Zone 1. A small part (some 0.35ha on the south-western boundary) representing only around 3% of the total Site is located within Flood Zones 2 and 3, given the proximity to the Hilden Brook (EA records). This is as confirmed in the TMBC Level 1 SFRA Site Screening document within the evidence base. Any development of the Site would avoid locating built form which would affect flood storage such as a land raising on land within flood zone 2 and 3. The site lies outside of the SPZ Zone 1, 2 and 3, but lies adjacent to a watercourse (Hilden Brook). During construction, protection of water quality will be carefully managed and monitored. Revised marking: Negligible (0) / Uncertain significant negative (--) SA Objective 9: To conserve and enhance soil resources and guard against land contamination Significant positive (++) The site is located on brownfield land. NO CHANGE SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+) The site is more than 800m from a railway station but within 400m of a bus stop. NO CHANGE SA Objective 11: To improve adaptation to climate change so as to minimise its impact Negligible (0) The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10. NO CHANGE SA Objective 12: To protect and improve air quality Negligible (0) The site is not within 100m of an AQMA. NO CHANGE SA Objective 13: To protect material assets and minimise waste strong Uncertain minor negative (-) The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed. COMMENTS: Kent Minerals and Water Local Plan 2013-30 (adopted 2020) includes maps for TMBC district Mineral Safeguarding Plan (pg 170). This indicates the presence of sub-alluvial river terrace deposits on the banks of Hilden Brook, the extent of which is extremely limited and located within the flood zone. Given the limited extent the mineral is not viable for working. Revised marking (0) - Negligible. SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures Significant positive (++) The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable</p>	

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		housing, as well as making a greater contribution towards local housing needs. NO CHANGE	
42587393	Annex 1	<p>THERE IS NO CLEAR INDICATION IN THE SUSTAINABILITY APPRAISAL OR THE INDIVIDUAL SITE EVALUATIONS REGARDING WHICH OF THE SITES ARE GREEN BELT. THEREFORE, WITHOUT A PROPER EVALUATION OF THE SITES IN THIS REGARD IT IS NOT POSSIBLE FOR RESIDENTS TO CONSIDER THE FULL MERITS OF EACH PLOT AND THEIR CHARACTERISTICS WHEN THEY RESPOND TO THE CONSULTATION AND PRIOR TO THE REGULATION 19 PLAN EMERGING. IT IS NOT MADE CLEAR IN THE SUSTAINABILITY APPRAISAL THAT THE NPPF WILL ASSUME THAT THERE IS NO ASSUMPTION IN FAVOUR OF DEVELOPMENT IN THE CASE OF GREEN BELT LAND, EVEN IF THERE IS NOT A 5 YEAR LAND SUPPLY. RATHER OTHER AVAILABLE LAND SHOULD BE CONSIDERED. THERE SHOULD BE A CLEARER STATEMENT IN THE SUSTAINABILITY APPRAISAL AGAINST THE DEVELOPMENT OF BEST MOST VALUABLE AGRICULTURAL LAND (BMV). I.E. GRADE 1. GRADE 2 AND GRADE 3A, AS DEFINED BY DEFRA. THIS REQUIREMENT MUST BE INCREASINGLY RELEVANT AND IMPORTANT GIVEN CLIMATE CHANGE REQUIREMENTS , THE PREVAILING WORLD ORDER AND THE VERY PRESSING ECONOMIC IMPERATIVES. THE SUGGESTION THAT GRADE 1 AND GRADE 2 LAND IS ONLY IMPORTANT IF IT IS LARGER THAN 25% OF A SITE AREA IS RIDICULOUS AS THIS JUST ENCOURAGES LAND OWNERS TO COMBINE PLOTS TO CREATE A SCENARIO THAT ELIMINATE THIS BARRIER TO DEVELOPMENT. BMV SHOULD BY DEFINITION ALSO INCLUDE GRADE 3A AND SHOULD BE PROTECTED, IRRESPECTIVE OF THE SIZE OF THE OVERALL PLOT.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to the Agricultural Land Classification, it is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints.</p>
42587393	Annex 1	<p>THERE IS NO CLEAR INDICATION IN THE SUSTAINABILITY APPRAISAL OR THE INDIVIDUAL SITE EVALUATIONS REGARDING WHICH OF THE SITES ARE GREEN BELT. THEREFORE, WITHOUT A PROPER EVALUATION OF THE SITES IN THIS REGARD IT IS NOT POSSIBLE FOR RESIDENTS TO CONSIDER THE FULL MERITS OF EACH PLOT AND THEIR CHARACTERISTICS WHEN THEY RESPOND TO THE CONSULTATION AND PRIOR TO THE REGULATION 19 PLAN EMERGING. IT IS NOT MADE CLEAR IN THE SUSTAINABILITY APPRAISAL THAT THE NPPF WILL ASSUME THAT THERE IS NO ASSUMPTION IN FAVOUR OF DEVELOPMENT IN THE CASE OF GREEN BELT LAND, EVEN IF THERE IS NOT A 5 YEAR LAND SUPPLY. RATHER OTHER AVAILABLE LAND SHOULD BE CONSIDERED. THERE SHOULD BE A CLEARER STATEMENT IN THE SUSTAINABILITY APPRAISAL AGAINST THE DEVELOPMENT OF BEST MOST VALUABLE AGRICULTURAL LAND (BMV). I.E. GRADE 1. GRADE 2 AND GRADE 3A, AS DEFINED BY DEFRA. THIS REQUIREMENT MUST BE INCREASINGLY RELEVANT AND IMPORTANT GIVEN CLIMATE CHANGE REQUIREMENTS , THE PREVAILING WORLD ORDER AND THE VERY PRESSING ECONOMIC IMPERATIVES. THE SUGGESTION THAT GRADE 1 AND GRADE 2 LAND IS ONLY IMPORTANT IF IT IS LARGER THAN 25% OF A SITE AREA IS RIDICULOUS AS THIS JUST ENCOURAGES LAND OWNERS TO COMBINE PLOTS TO CREATE A SCENARIO THAT ELIMINATE THIS BARRIER TO DEVELOPMENT. BMV SHOULD BY</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to the Agricultural Land Classification, it is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		DEFINITION ALSO INCLUDE GRADE 3A AND SHOULD BE PROTECTED, IRRESPECTIVE OF THE SIZE OF THE OVERALL PLOT.	
42643873	Annex 1	<p>These comments specifically refer to Green Belt and BMV agricultural land sites 59693, 59721, 59685, 59805, 59809, 59690, but may be applied more generally. REGARDING AGRICULTURAL LAND: There should be a clearer statement in the Sustainability Appraisal, Sustainability Objectives and Targets against the development of Best, Most Valuable Land as defined by DEFRA. This should include grade 3A land as well as grades 1 and 2. The above sites include, along with grades 1 and 2 land, some grade 3A land which is regularly farmed and which the farmer considers productive. The Placemaker scoring system ignores the presence of grade 3A land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. I am very concerned that these sites have been amalgamated with the larger Grange Farm (59690) site to make "site" 59805. This has the effect of considerably diluting the % of grades 1 and 2 land on the combined "site". I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging OF sites in this way to reduce the % of grades 1 and 2 land on them could enable all grade 2 land to be developed. THIS WOULD BE A</p>	<p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints.</p> <p>With regard to the Placemaker tool, this comment does not specifically relate to the SA. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>
42705473	Annex 1	<p>Site 59696: fields at the rear of Vauxhall Gardens TN11 0LZ. The appraisal claims the site is within 800m of medical facilities. That may only be true as the crow flies, if it refers to Tonbridge Cottage Hospital, to the south, on the other side of the dual A21; the only viable pedestrian or vehicle route is much longer. The nearest doctors' surgery, Tonbridge Medical Centre is over a mile away. The appraisal says there is no watercourse, but there is seasonal flow down the ditch alongside the track leading to Priory Wood and a pond in the copse on the northern edge of the site. The appraisal does not mention that development would mean the loss of mature oaks and a copse with Tree Preservation Orders, as well as the loss of established hedgerows; the environmental impact would be significant. The site is Green Belt and looks across to the High Weald AONB on Castle Hill slopes. Access to the highway would only be possible via the hazardous Vauxhall Gardens junction to Pembury Road, which would entail skirting the listed Vauxhall pub. Air quality would be worsened by additional traffic entering a frequently congested road and Vauxhall roundabout. There are no schools with spare capacity within walking distance. The site is unsuitable for high density housing. Site 59697: this constricted, sloping, triangular site has been proposed for 'commercial' use. It is bounded by the embankment of the southbound A21 carriageway, the southbound off-ramp down to</p>	<p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>The respondent refers to a seasonal flow ditch alongside the track leading to Priory Wood and a pond in the copse on the northern edge of the site. These features are not displayed in the Ordnance Survey GIS data for water. As such, the effect remains the same.</p> <p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. The SA does not give consideration to TPOs.</p> <p>The site also receives an uncertain significant negative effect in relation to SA objective 6: landscape. The SA acknowledges the fact the site is within 500m of the AONBs.</p> <p>The site receives a negligible effect in relation to SA objective 12: air quality, as it is not within 100m of an AQMA. This is in line with the site assessment criteria.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		Vauxhall roundabout and the Vauxhall Lane connection loop from the northbound A21. There is no conceivable junction for vehicular access. The site has no existing access to power or sewerage. If developed with a warehouse or similar it would blight the southern gateway into Tonbridge. Like 59696 it is Green Belt and close to the road gates to the Grade 2 listed Somerhill Park.	<p>With regard to access to schools, the SA states that the site is within 800m of an existing secondary school and an existing primary school. The SA also acknowledges that uncertainty exists, as the effect will depend on there being capacity available at those schools to accommodate new pupils.</p> <p>With regard to site 59697, this was submitted through the Call for Sites exercise, and is therefore considered to be a reasonable alternative and was subject to SA</p> <p>With regard to site 59696, the SA acknowledges that the site is located within 250m of a heritage asset. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>
42642561	Annex 1	59623 A recent application to develop this site was refused by TMBC in March 2022 (21/01677/FL). It was refused on the grounds of; It will cause less than significant harm to the character of the Tonbridge conservation area which when weighted against public benefits was refused under paragraph 11(d) (i) of the NPPF 2021The development would result in an overbearing and incongruous addition failing to accord with the surrounding built form contrary to CP24 of the core strategy, Policy SQ1 of the borough managing development and the environment DPD 2010 and p 130 and 134 of the NPPF 2021. The development would have an overbearing impact on the residential amenities of the neighbouring property resulting in loss of of aspect and increased noise contrary to CP1 and CP24 of the core strategy.These harms are considered to significantly and demonstrably outweigh the benefits of the proposal such that the presumption *in favour of sustainable development in para 11 (d) of the NPPF does not apply. Additionally; contrary to SA Objective 3, the only schools within 800m are private. SA Objective 5, there is known and recorded activity of Bats in immediate vicinity. SA Objective 6, to demolish a house and redevelop the site, in a conservation area, simply cannot (by definition) protect the boroughs townscape character. Surely to redevelop the existing structure would be more beneficial and environmentally more sustainable than knocking down a perfectly good house.	<p>Sites identified through the Call for Sites exercise and Urban Capacity Study have been subject to SA.</p> <p>With regard to SA objective 3: education, the proforma states "The site is within 800m of an existing secondary school or a primary school (but not both)." Specifically, the site is within 800m of Slade Primary School. All schools included in the GIS analysis are state schools.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity and 6: landscape and townscape, the site has been appraised in line with the site assessment criteria, as outlined in Appendix D of the Interim SA Report.</p> <p>With regard to the site falling within the Conservation Area, this is acknowledged by the uncertain significant negative effect against SA objective 7: heritage. SA objective 6 deals with the landscape and townscape whereas SA objective 7 deals with the historic environment.</p>
42587393	Annex 1	The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development "that protects areas of particular importance", which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first. Best Most Valuable Agricultural Land (BMV) – here should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). i.e. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site. It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined “site”. I contend that “site” 59805 is not a true single site as it is bisected by a road. In theory the further enlarging OF sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	<p>Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>
42718433	Annex 1	<p>Green Belt Land – The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first. Best Most Valuable Agricultural Land (BMV) – There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade</p>

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		that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.	1, 2 and/or 3a agricultural land will receive a significant negative effect. Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.
42718561	Annex 1	Green Belt Land – The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development "that protects areas of particular importance", which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and to consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first. Best Most Valuable Agricultural Land (BMV) There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report (Regulation 18 Round 3), will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect. Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.	whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.
42260449	Annex 1	Best Most Valuable Agricultural Land (BMV) – There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.	<p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59805 and 59690 have been appraised as separate sites. Each site receives a significant negative effect in relation to SA objective 9: soils. This is because site 59805 is a greenfield site and contains a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 is also a greenfield site and contains a significant proportion of Grade 3 agricultural land, but it is unknown whether this is Grade 3a (high quality) or 3b (not classed as high quality) agricultural land and therefore the effect is recorded as uncertain. This is because in some places the Agricultural Land Classification mapping does not distinguish between Grades 3a and 3b agricultural land.</p>
42260449	Annex 1	Green Belt Land – The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development "that protects areas of particular importance", which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first.	
42729569	Annex 1	<p>Site 59661. SA Objective 4 – the potential for economic growth is limited by the fact that the site has major access problems, since it is on a private lane with a public right way only for foot traffic. The lane itself is single track with weak bridges and unsuitable for delivery lorries even if there was a right of way for them (which there isn't). There is no access from Vale Road. This would be a poor area for business. SA Objective 5 – destroying a flood plain would obviously have an adverse effect on biodiversity. SA Objective 8 – This site is a flood plain, surrounded on three sides by rivers (look at a map). Unsurprisingly, therefore, it floods. I have lived in Postern Lane for 11 years and have seen this site completely covered by the Medway three or four times – this isn't a remote eventuality or a one in 30 year risk. It floods ALL THE TIME. In a bad year it floods so heavily that the waters flow from the Medway all across the land, over Postern Lane and into the tributary to the south of the lane. Don't build on it. SA Objective 11 – given that this site already floods all the time, and that climate change is predicted to increase the regularity and severity of flooding, it is wrong to give this site a negligible rating. This site is a complete non-starter for development.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The SA is too high-level to give consideration to site-specific access points. This is something that will instead be determined at planning application stage, if the site is allocated.</p> <p>The SA acknowledges that the site is at risk of flooding, with the site receiving an uncertain significant negative effect in relation to SA objective 8: water.</p>
42740033	Annex 1	<p>59613. Snoll Hatch East Peckham is a rural community that consists of nine Hamlets. Established anti-coalescence planning policy dictates that the distinct nature of the Hamlets must stay protected and preserved. The three main rivers of the Borough run through the village, flooding of roads, residential and business properties is a regular occurrence. The entirety of the village of East Peckham, including its constituent Hamlets, is surrounded by land designated as green belt. This is not a suitable site for development because: Objective 9 states the site is brownfield. The Site is green belt, not brownfield. The Revised NPPF (2021) indicates at paragraph 137 that openness is an essential characteristic of the Green Belt. The openness of the Green Belt has a spatial aspect as well as a visual aspect. 'Open' can mean the absence of development in spatial terms, and it follows that openness can be harmed even when development is not readily visible from the public realm. Objective 2 states fair accessibility. This is incorrect, accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway Rivers, and flash flooding occurs from run off from hills to the north and east of the Site. All the above roads are the only access to the area that contains site 59613. All are unsuitable for extra traffic, and all will leave the site isolated and inaccessible during the regular flooding. Flooding occurs on this site from both the River Bourne and River Medway, and also from run off from surrounding higher land.</p>	<p>The Green Belt often contains areas of brownfield land, in addition to greenfield land.</p> <p>With regard to flooding, the site receives a mixed significant negative and negligible effect in relation to SA objective 8: water. The significant negative effect is due to the fact the site is either entirely or significantly (i.e. more than or equal to 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the site not containing a water body or watercourse, or falling within a Source Protection Zone.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CP10 states within the floodplain, development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Paragraph 167 of the Revised NPPF (2021) advise that when determining planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Ground water tables are very high in this area. A recent application for a major development in the village (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59613 will need considerable ground build up (over 500mm) to achieve the minimum clearances stated in the SuDS Manual. This will have the knock on effect of displacing surface and flood water into existing properties. Any discharge of surface water from this site into surrounding watercourses will create extra flooding downstream. The Pound, Old Rd, Medway Meadows and Branbridges 170oesn'ty suffer from severe flooding from the Medway and Bourne. The Coult Stream regularly floods Hale St, Smithers Lane and further into the Clubbs Quarry. (Photos of those roads and areas below); TMBC's 2016 Green Belt survey specifically mentions the Snoll Hatch Hamlet and the importance of anti-coalescence measures being maintained to keep the Hamlet separate from the main village of East Peckham. Development of site 59613 will directly undermine this long standing anticoalescence policy. The Local Development Framework (para 6.3.35) state East Peckham, Snoll Hatch and Hale Street must be kept separate and not filled in by housing. Developing site 59613 will be in direct opposition to current anti-coalescence policy. Site 59613 does not fall within a Rural Service Centre and never has. East Peckham lost its GP practice in 2018 and should also no longer be classed as a Rural Service Centre. It has also lost its two village pubs and more recently its bakers. Site 59613 is immediately adjacent to Snoll Hatch Character Area, the integrity of which must be preserved. The nearest train station is 2.4km from the site, and is not a commuter station. The roads to it are narrow, without lighting or pavement and regularly flood making it impassable to pedestrian and vehicle. There is no parking at the station. No booking office. No telephone. No toilets. No wheelchair availability. No step free access. No accessible taxis. No impaired mobility set down and no staff. The 6000-8000 homes being built in the Capel and Paddock Wood developments are within 3 miles of East Peckham. This will cause flooding and traffic issues within East Peckham as well as place huge strain on infrastructure. This housing will meet need in the East Peckham area, and to build more locally will completely overwhelm the area in every way imaginable. Flooding, traffic and housing need calculations from the Capel and Paddock Wood developments to be taken into account whilst considering site 59613. Due to the above reasons, East Peckham Parish Council does not consider that this site is suitable for development, and should not be included as part of the</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		Local Plan. It would destroy green belt and increase flooding risk. The ground water levels are unsuitable for the use of SuDs. Anti-coalescence policy also dictates the site is unsuitable. The surrounding roads and lanes are very narrow, and regularly flood from numerous sources. East Peckham has lost important infrastructure in recent years, most notably the GP Surgery, pubs and the bakery. There is no accessible to a commuter railway station. East Peckham should no longer be classed as a Rural Service Centre. Should site 59613 be chosen for development, East Peckham Parish Council would expect sequential testing to evidence that there is no more suitable site for development elsewhere within the Borough.	
42732801	Annex 1	<p>Site 59424. SA Objective 1: The current unbroken walking/cycle/bridle-path would need to be broken to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. SA Objective 2: The site may be considered to be in a 'good accessibility' band, but in reality, providing access would involve in the destruction open spaces and therefore adversely impact the ability to achieve SA Objective 1 (Improve human health and well-being) and SA Objective 5 (To protect and enhance biodiversity and geodiversity). This status should change from Negligible to Uncertain significant negative. Site 59531 SA Objective 2: The site may be considered to be in a 'very good accessibility' band, but in reality, providing access to the site would involve breaking a footpath, therefore adversely impacting the ability to achieve SA Objective 1. This status should change from from Minor positive to Uncertain significant negative. Site 59534 SA Objective 2: The site may be considered to be in a 'very good accessibility' band, but in reality, providing access to the site would involve breaking a footpath, therefore adversely impacting the ability to achieve SA Objective 1. This status should change the position from Minor positive to Minor negative. Site 59534 SA Objective 1: The current unbroken walking/cycle/bridle-path would need to be broken to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. SA Objective 2: The site may be considered to be in a 'very good accessibility' band, but in reality, providing access to the site would involve breaking a footpath, therefore adversely impacting the ability to achieve SA Objective 1. This status should change the position from Minor positive to Uncertain significant negative. Site 59547 SA Objective 2: The site may be considered to be in a 'very good accessibility' band, but in reality, providing access to the site would involve breaking a footpath, impact on green space and therefore adversely impact the ability to achieve SA Objective 1 or SA Objective 5. This status should change the position from Minor positive to</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 14 relates to housing delivery only. Health and wellbeing is considered separately under SA objective 1, access is considered separately under SA objective 2 and biodiversity is considered separately under SA objective 5.</p> <p>The SA is too high-level to give consideration to site-specific access points. This is something that will instead be determined at planning application stage, if the site is allocated.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Uncertain significant negative. Site 59630 SA Objective 1: The current unbroken walking/cycle/bridle-path would need to be broken to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive/Uncertain significant negative to Uncertain significant negative. Site 59630 SA Objective 1: The current green space would be impeded to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. Site: 59634 SA Objective 1: The current green spaces/conservation areas would be impeded to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. Site: 59655 SA Objective 1: The current green spaces/conservation areas would be impeded to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. SA Objective 2: The site may be considered to be in a 'fair accessibility' band, but in reality, achieving SA Objective 14 would adversely impact attempts to achieve SA Objective 1, SA Objective 3 or SA Objective 5 This status should change the position from Minor positive to Uncertain significant negative. Site: 59740 SA Objective 1: The current green spaces/conservation areas would be impeded to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive/Uncertain significant negative to Uncertain significant negative. Site: 59740 SA Objective 1: The current green spaces/conservation areas would be impeded to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive/Uncertain significant negative to Uncertain significant negative. Site: 59797 SA Objective 1: The current green spaces/conservation areas and sports facilities would be impeded to provide accessibility to achieve SA Objective 14 (To</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive/Uncertain significant negative to Uncertain significant negative. SA Objective 2: The site may be considered to be in a 'fair accessibility' band, but in reality, providing access to the site would involve breaking a footpaths, impact on green space and construction of new significantly sized access roads joining the A26/Tonbridge Road and therefore adversely impact the ability to achieve SA Objective 1 or SA Objective 5. This status should change from Minor negative to Uncertain significant negative. Site: 59800 SA Objective 1: Achieving SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) would likely result in the human health and well-being would not be improved for residents of existing dwellings due to over population of the surrounding area. This status should change from Minor Positive to Uncertain significant negative. Site: 59884 SA Objective 1: The current unbroken walking/cycle/bridle-path would need to be broken to provide accessibility to achieve SA Objective 14 (To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures) as a result human health and well-being would not be improved for residents of existing dwellings, nor provided to residents of any new dwellings. This status should change from Minor Positive to Uncertain significant negative. SA Objective 2: The site may be considered to be in a 'good accessibility' band, but in reality, providing access would involve in the destruction open spaces and therefore adversely impact the ability to achieve SA Objective 1 (Improve human health and well-being) and SA Objective 5 (To protect and enhance biodiversity and geodiversity). This status should change from Negligible to Uncertain significant negative.</p>	
25205729	Annex 1	<p>https://www.dropbox.com/s/s5ecoyha3frakpq/RPP%20final%20Little%20Postern%20Objection%20Statement%20-.pdf?dl=0 rel="noopener Above is a link to a report prepared for the Postern Lane Residents at the time of the last Local Plan on Site 59701. Many of the points remain relevant and can inform the Sustainability Appraisal for this site. Key points are drawn out below: SA4 – This site is considered undeliverable because of access issues arising from the topography of the site, see paragraph 5.7. It will not therefore contribute to economic growth. SA5 – Section 10 of the report highlights the biodiversity aspects of this site and therefore the negative impact that development will have. SA6 – Section 6 highlights the sites adverse impact on residential amenity. Paragraph 7.4 draws attention to the sloping nature of the site which will make it visually prominent in the surrounding landscape. SA7 – Section 9 of the report and Appendices 4, 5 and 6 highlight the sites proximity to a number of cultural assets. The site is less than 200m from 3 listed buildings. SA8 – Flood risks are covered in Section 8 of the report. The site is within Environment Agency Flood Zones and there have been recent (2009) examples of flooding emanating from this site. SA9 – Section 7</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The SA is too high-level to give consideration to the topography of individual sites.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		describes the site of consisting of Grade 2 and Grade 3 agricultural land, in productive use as orchards for over 50 years.SA12 – Section 5 of the report considers the highway impact if access is possible to the site. Analysis suggests that development is likely to lead to increased congestion on Woodgate Road and Vale Road which will have consequential adverse impacts on air quality. This site also lies within the Green Belt, paragraphs 11.1 to 11.13 suggest that there are not exceptional reasons which would justify the removal of this site from the Green Belt. I hope that the information provided is helpful in determining whether this site should continue to be assessed for development on the next stage of the Local Plan.	
42746209	Annex 1	<p>Some general points of concern. Inconsistency: Some sites have been give different assessments but the commentary is exactly the same. Access: It is stated that access to schools or public transport are within a specific distance of the designated sites but this cannot be the case for the whole area of the site./li> Local knowledge: Equally, access to a school site may be via a woodland or for public transport to a bus stop with limited services – there is no way that all new residents would use these services. Health: There is now no GP service in West Malling, the closest is Kings Hill or Leybourne. The Sustainability Objective also conflates health facilities with access to sporting facilities/playgrounds! Highways: Sustainability Appraisal objectives do not include impact on the local road system. Specific points of concern (by Sustainability Appraisal objective)59594 – 34 houses Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59602 – 19 houses Objective 3: We question if this is within 800m of a primary or secondary school. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59603 – 30 houses Objective 3: We question if this is within 800m of a primary or secondary school. Objective 9: As this includes site 59602 in its entirety which is classified as greenfield, how can this site be assessed as brownfield? Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. Does it also double-count the site it encompasses: 59602? 59699 – 260 houses Objective 1: With the closing of West Malling surgery the site is not within 800m of an existing health facility. Objective 4: The site is not all within 400m of a bus stop, nor would all 260 households be able to use this limited bus service or cycle. It is also unclear what business opportunities this mixed use site would deliver and therefore its impact on the local economy. Objective 6: This should be significant negative as it will have a major impact on the landscape. Objective 10: The majority of the site is not within 400m of a bus stop and the bus service is extremely limited – it would increase car/highway movements significantly. 59716 – 28 houses Objective 1: Contradictory, no explanation is given. It can't be both significantly negative and significantly positive. Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to measuring straight-line distances from the edge of a site option, this was done using the smallest distance between a site and existing services and facilities. The SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater".</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated.</p> <p>There is considered to be a lot of crossover between access to healthcare facilities and areas of open space and sports facilities, as these can encourage more physical activity with beneficial effects on people's health. The site assessment criteria for SA objective 1: health and wellbeing are considered suitable and appropriate.</p> <p>With regard to SA objective 6: landscape and townscape, the site is recorded as having a minor negative effect because it is located on the edge of the settlement of West Malling. The effect is uncertain, as the actual effect is dependent on the final design, scale and layout of development.</p> <p>The proformas for each site accurately state whether they are within 400m of a bus stop or not. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>question why a positive, we don't believe the site would give a mix of tenures due to its size. 59733 – 27 houses Objective 9: Brownfield? Objective 10: Majority of site not within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59406 – 20 houses Objective 2: This should be the same as for site 59596 ie significant negative, as it is immediately next door. Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. Objective 9: We question if this is all brownfield land. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59596 – 23 houses Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59648 – 17 houses Objective 9: We question if this is all brownfield. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. 59649 – 9 houses Objective 3: This should be the same as site 59648, ie negative?, as it is immediately next door. Objective 9: We question if this is all brownfield. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p>	<p>With regard to SA objective 9: soils, site 59602 comprises brownfield land. The GIS analysis has been updated to reflect this.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The proformas for each site accurately state whether they are within 800m of a primary school or not.</p> <p>The appraisal of site 59603 does not double-count site 59602, which it encompasses. Each of these sites has been appraised separately.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA Report, the justification text will be provided. In accordance with the SA methodology set out in Chapter 2 of the Interim SA Report, sites can have mixed effects.</p>
42746209	Annex 1	<p>Some general points of concern Inconsistency: Some sites have been give different assessments but the commentary is exactly the same. Access: It is stated that access to schools or public transport are within a specific distance of the designated sites but this cannot be the case for the whole area of the site. Local knowledge: Equally, access to a school site may be via a woodland or for public transport to a bus stop with limited services – there is no way that all new residents would use these services. Health: There is now no GP service in West Mallong, the closest is Kings Hill or Leybourne. The Sustainability Objective also conflates health facilities with access to sporting facilities/playgrounds! Highways: Sustainability Appraisal objectives do not include impact on the local road system. Specific points of concern (by Sustainability Appraisal objective) Site ID: 59594 – 34 houses Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This site will have a major impact on traffic through Offham. It will also diminish the gap between West Mallong and Kings Hill as one of a number of sites proposed between these settlements. Site ID: 59602 – 19 houses Objective 3: We question if this is within 800m of a primary or secondary school. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This site will have a major impact on traffic through Offham. It</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to measuring straight-line distances from the edge of a site option, this was done using the smallest distance between a site and existing services and facilities. The SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater".</p> <p>The GP surgeries data used to inform the Interim SA Report included West Mallong GP surgery .However, this GP surgery is now closed. In the next iteration of the SA Report, and the proformas for the sites affected will be updated.</p> <p>There is considered to be a lot of crossover between access to healthcare facilities and areas of open space and sports facilities, as these can encourage more physical activity with beneficial effects on people's health. The site assessment criteria for SA objective 1: health and wellbeing are considered suitable and appropriate.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>will also diminish the gap between West Malling and Kings Hill as one of a number of sites proposed between these settlements. Site ID: 59603 – 30 houses Objective 3: We question if this is within 800m of a primary or secondary school. Objective 9: As this includes site 59602 in its entirety which is classified as greenfield, how can this site be assessed as brownfield? Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. Does it also double-count the site it encompasses: 59602? This site will have a major impact on traffic through Offham. It will also diminish the gap between West Malling and Kings Hill as one of a number of sites proposed between these settlements. Site ID: 59699 – 260 houses Objective 1: With the closing of West Malling surgery the site is not within 800m of an existing health facility. Objective 4: The site is not all within 400m of a bus stop, nor would all 260 households be able to use this limited bus service or cycle. It is also unclear what business opportunities this mixed use site would deliver and therefore its impact on the local economy. Objective 6: This should be significant negative as it will have a major impact on the landscape. Objective 10: The majority of the site is not within 400m of a bus stop and the bus service is extremely limited – it would increase car/highway movements significantly. This site will have a major impact on traffic through Offham. It will also diminish the gap between West Malling and Kings Hill as one of a number of sites proposed between these settlements. It will impact on Fartherwell Road which is a designated Quiet Lane. Importantly, it is also in the green belt and on prime agricultural land. The sites on St Leonards St/Teston Rd just by Malling Meadows, the Crest and opposite next to Orwell Spike are also close by. Offham already suffers from too much vehicle traffic from Kings Hill. Site ID: 59716 – 28 houses Objective 1: Contradictory, no explanation is given. It can't be both significantly negative and significantly positive. Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This site will have a major impact on traffic through Offham. It will also diminish the gap between West Malling and Kings Hill as one of a number of sites proposed between these settlements. Site ID: 59733 – 27 houses Objective 9: Brownfield? Objective 10: Majority of site not within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This site will have a major impact on traffic through Offham. It will also diminish the gap between West Malling and Kings Hill as one of a number of sites proposed between these settlements. Site ID: 59406 – 20 houses Objective 2: This should be the same as for site 59596 ie significant negative, as it is immediately next door. Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. Objective 9: We question if this is all brownfield land. Objective 14: We question</p>	<p>The proformas for each site accurately state whether they are within 400m of a bus stop or not. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The proformas for each site accurately state whether they are within 800m of a primary school or not.</p> <p>The appraisal of site 59603 does not double-count site 59602, which it encompasses. Each of these sites has been appraised separately.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA Report, the justification text will be added to the proforma. In accordance with the SA methodology set out in Chapter 2 of the Interim SA Report, sites can have mixed effects.</p> <p>With regard to the landscape, all reasonable alternative development site options have been appraised in accordance with the site assessment criteria.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>why a positive, we don't believe the site would give a mix of tenures due to its size. This piece of land sits outside the defined rural settlement boundary of Offham Village Together with Site 59596, this would be the equivalent of building another Pepingstraw Close on the edge of the Village. Such a development is not sustainable in a small village. There is one pub, The Kings Arms, only one church – St Michael's, a single form entry primary school and a Farm Shop that is part of the Spadework Charity at the opposite end of the Village to the proposed site. Whilst there is currently a bus service operating the frequency of buses to and from Offham is extremely limited, being under review by KCC and is almost certainly going to be removed, and in general the majority of residents are dependent on private vehicular transport. The traffic generation emanating to and from the site will be of significance to the village. Unfortunately, Offham village is a rat run for Kings Hill and other areas travelling to and from the A20/motorway intersections. At both morning and evening peak times there is a constant stream of traffic along Teston Road and the proposed site entranced is at a particularly point in the road where traffic tends to speed up when leaving the Village. Likewise, for traffic entering the Village from this end, having negotiated the gateway, then tend to speed towards the Village before breaking heavily before the bend in the road just past the proposed entrance. The vehicle movements from 20/43 more houses entering and exiting onto Teston Road would have a detrimental impact on traffic movements through the Village let alone the added dangers due to the location of the access at this particular point. Site ID: 59596 – 23 houses</p> <p>Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This piece of land sits outside the defined rural settlement boundary of Offham Village, is in zoned Metropolitan Green Belt and also adjacent to old established woodland. Together with Site 59406, this would be the equivalent of building another Pepingstraw Close on the edge of the Village. Such a development is not sustainable in a small village. There is one pub, The Kings Arms, only one church – St Michael's, a single form entry primary school and a Farm Shop that is part of the Spadework Charity at the opposite end of the Village to the proposed site. Whilst there is currently a bus service operating the frequency of buses to and from Offham is extremely limited, being under review by KCC and is almost certainly going to be removed, and in general the majority of residents are dependent on private vehicular transport. The traffic generation emanating to and from the site will be of significance to the village. Unfortunately, Offham village is a rat run for Kings Hill and other areas travelling to and from the A20/motorway intersections. At both morning and evening peak times there is a constant stream of traffic along Teston Road and the proposed site entranced is at a particularly point in the road where traffic tends to speed up when leaving the Village. Likewise, for traffic entering the Village from this end, having</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>negotiated the gateway, then tend to speed towards the Village before breaking heavily before the bend in the road just past the proposed entrance. The vehicle movements from 20/43 more houses entering and exiting onto Teston Road would have a detrimental impact on traffic movements through the Village let alone the added dangers due to the location of the access at this particular point. Site ID: 59648 – 17 houses Objective 9: We question if this is all brownfield. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. There will be a solar farm on the adjacent landfill site which would have a direct impact on any properties built at this location. Currently a power station associated with the landfill is still operating in the south section of this site (see below). Gas risk assessment The landfill site is still active with respect to ground gases, still with occasional elevated methane (and CO2) and the exact migration pathway for the gas is uncertain. Offham Parish Council has not seen satisfactory evidence of safety regarding gas and noise within any current planning application. Gas utilisation/electricity generation compound to south of site Residents at the Aldon Lane/Teston Road junction and in the Aldon Conservation area report regular audible noise emanating from this equipment (350 – 500 metres) at night with the prevailing south westerly wind. Any residences at a distance of 50 metres from the equipment is likely to be substantially affected while the equipment is in place. Highway safety The site lines are not perfect because of a slight curve in the road to the east. There are dangers present from the westerly approach, dangers of which Offham Parish Council and the local County Council member are well aware. This is an unsafe location for new houses to exit onto Teston Road. There is a speed unrestricted bend of some 35-40 degrees which is at the westernmost end of the White Ladies site and at the end of a 700 metre straight. Sight lines are limited. In early 2020, following concerns expressed, near miss etc., KCC Highways erected yellow warning signs either side of the bend as a warning of this bend. The yellow background emphasises that one should pay particular attention to the warning information the sign is trying to convey; they are used to give you extra warning in accident-prone spots. The distance of visibility eastwards for vehicles approaching from the west, from the bend to the proposed gateway is 100 metres. Conversely a distance of 100 metres from the current gate eastwards is a straight line and even with the slight curve, the visibility is much better than the western approach with the bend. Vehicles are warned with the signs but many take the bend at speed. For vehicles exiting from the proposed gateway position this will create even more dangerous situations than leaving the gateway in its original position. Moving an exit closer to the bend is more dangerous than concerns about sight lines in the other direction. This land is unsafe for residential development and contains contamination. Site ID: 59649 – 9 houses Objective 3: This should be the same as site 59648, ie negative?, as it is immediately next door. Objective 9: We question if this is all brownfield. Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. This is immediately adjacent to the edge of a landfilled quarry</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		site, the stability and consistency of the land being quite uncertain, in addition to its risk of gas migration. Access is immediately on to an179oesn'ticted road just outside the village gateway. It will also be coincident with or extremely close to the access roadway into the proposed solar farm site.	
42716961	Annex 1	<p>Site 59827 – Residential – Proposed 82 houses Within AONB, Green Belt, adjacent to Conservation Area. SA Objective 1 – Shipbourne Common and the extensive Public Rights of Way leading from the Shipbourne Conservation Area out across the fields and woodland of the AONB set within the Openness and Permanence of the Green Belt provide the many visitors with an essential well-being and recreational resource. Those unable to access field paths, due to young age or infirmity, tend to enjoy the Common and walk down Upper Green Road along Back Lane, enjoying the open views to Fairlawne and out to the Forestry at Point Wood. This proposal would degrade this experience by providing a high density of housing in the valley between Back Lane / Reeds Lane and Point Wood. The mass of the development being clearly seen from the Rights of Way footpath from Back Lane to Point Wood / Kiln Wood. The size of the proposal would urbanise the valley and be in the line of sight of heritage assets. It may also encourage applications leading to ribbon developmenquot; along Back Lane. SA Objectives 2,3,10 and 12 – Housing development of this scale in a poor accessibility band would greatly increase traffic movements and be contrary to the Sub-Objective to encourage walking and cycling. Journeys to the secondary schools would be either by car (promoting 2 car households) or by increased subsidised bus services. The village infant/junior school is at capacity. SA Objectives 8 and 14 – The foul sewer in Back Lane is frequently blocked and overflows into the ditch (last Event 3pm 24 Oct 2022). Objective 8 notes that the area is in a risk area for flooding. Greater impermeable areas due to development requiring surface water sewers may contribute to flooding. There is no gas in Shipbourne, existing heating tends to be by oil. New development of the scale suggested would need electric heat pumps, car charging points, street lighting, requiring new electric mains supply. Water mains may also need upgrading. Road access from Back Lane would require kirbs changing the rural character of the lane (a principle discussed in Ivy Hatch Conservation Area Appraisal). The A227 / Back Lane junction would need upgrading to safeguard the school. These enabling works will greatly disrupt the highways and the costs will be very high. Reg. 18 Consultation Doc. 1:6:1 states that it is crucial that potential sites are realistically deliverable from a financial perspective....because unviable development means much needed homes will not be delivered....SA Objective 5 – The Green Belt Study 2016, page 53 clearly and correctly recognises the area designated as AONB, with its ancient woodland, local wild life, TPO's. The Common supported by these open fields and surrounding woodland is host to much bio-diversity. SA Objective 6 – Given the nature of the landscape relative to the Conservation Area etc. development would be contrary to the Sub-Objective to protect landscape character and quality and cannot be mitigated by design.SA Objective 7 – The development is in the line</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The proformas for each site accurately state whether they are within 800m of a primary or secondary school or not. All effects are recorded as uncertain, as the effects will depend on there being capacity at those schools to accommodate new pupils (see paragraph D.14 of the Interim SA Report).</p> <p>With regard to the landscape, all reasonable alternative development site options have been appraised in accordance with the site assessment criteria. SA objective 6 deals with the landscape and townscape whereas SA objective 7 deals with the historic environment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		of sight of heritage assets. Development would be contrary to the Sub-Objective to protect and enhance historic buildings, sites and landscape. The Shipbourne Design Statement identifies a number of buildings dating from the 16 th century and the landscape character around them. So far the village is unmarred by Developers Pastiche architecture.	
42716961	Annex 1	<p>Site 59779 – Residential – Proposed 38 houses. Within AONB, Green Belt, adjacent to Conservation Area. SA Objective 2 and 3Housing development of this scale in a poor accessibility band would increase traffic movements onto Back Lane and particularly to the junction with the A227. The infant and junior school on the junction would need to be safeguarded as parents currently park on Back Lane close to this junction and opposite the likely proposed new site entrance road. Development will increase car journeys by travel to the local secondary schools and train stations (promoting 2 car households) and/or subsidised bus services which must be increased. The village infant / junior school is at capacity.SA Objectives 10 and 11Increased traffic movements would discourage walking and cycling.SA Objectives 8 and 14 New development of the scale suggested would need electric heat pumps, car charging points, street lighting. A question is whether the existing sub-station on the junction has spare capacity without affecting the existing village supply. Similarly for water mains supply. Does the foul sewer at the A227 junction have capacity as the sewer in Back Lane is frequently blocked and overflows into the ditch (last event 3pm 24th Oct 2022). Increased impermeable surfaces will require surface water drainage potentially increasing discharges to water courses. The site is noted in Objective 8 as being in a flood zone. These enabling works may be high when spread over 38 house units and affect the viability of the site for developers – Reg 18 Consultation Doc 1:6:1 refers to unviable development. SA Objective 5 The Green Belt Study 2016, page 53 clearly and correctly recognises the area designated as AONB, with it's ancient woodland, local wild life, TPO's. The common supported by these open fields and surrounding woodland is host to much bio-diversity which is endangered by creeping development. Developments requiring street lighting etc. also creates a glow which removes the night sky which has been a feature on the Common and enjoyed by many. SA Objective 6 and 7The development may permit arguments leading towards further infilling of plots of land along Back Lane causing a tendency towards ribbon development; contrary to the Sub-Objectives to protect landscape character and quality...to protect and enhance landscape. The Shipbourne Design Statement identifies a number of buildings dating from the 16th century and the importance of this landscape in which they exist.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to the capacity of GP surgeries and schools, this is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The SA is too high-level to give consideration to site-specific access points, water mains supply and foul sewerage.</p>
42764129	Annex 1	Representation to the Tonbridge and Malling Borough Council (TMBC) Regulation 18 Local Plan and Interim Sustainability Appraisal Please find below our representation to the TMBC Regulation 18 Local Plan consultation. This representation objects to the proposed allocation of Land to east of Ismays Road, Ivy Hatch (Site 59608) for residential development. Context The National Planning Policy Framework (NPPF)	All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 181oesn'tnable development has three interdependent objectives that need to be pursued in mutually supportive ways: an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report is also subject to the Regulation 18 consultation.AssessmentThe Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to</p>	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the site is located within 800m of a public open space (Scathes Wood). Therefore, it receives a minor positive effect, in line with the site assessment criteria.</p> <p>With regard to SA objective 4: economic growth, as stated in the proforma for the site "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, the criteria for this objective will be updated so that if a site proposed for residential development contains an existing business, it will receive a minor negative effect.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.SA Objective 1: To improve human health and well-being. The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (ProW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities. With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of this Site would not represent sustainable development through actively reducing health inequalities, improving access to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development. SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.' It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.' This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and</p>	<p>A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs. Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape. The Site is highly visible in views from the adjacent ProW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development. It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land. None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.SA Objective 7: To protect and enhance the cultural heritage resource. The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.' The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them. We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.SA Objective 9: To conserve and enhance soil resources and guard against land contamination. The SA states: 'The site is located on brownfield land.' The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nursery grounds. Agricultural uses are exempt from the definition of</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF. With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'The Site is located approximately 350m from bus stops on Ightham Road via a ProW adjacent to the site. The ProW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday. The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location. With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location. In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures. The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.' The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>that would meet local housing need. Conclusion The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to. The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change. In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development. We consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In our view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and we request that the Site is not allocated in the emerging Local Plan.</p>	
42587393	Annex 1	<p>Green Belt Land – The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>year land supply. Rather all other options should be considered first. Best Most Valuable Agricultural Land (BMV) There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site. It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	<p>criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p>
42546145	Annex 1	<p>SITE ID 59641. I have written my comments in bold following the existing comments contained in Annex 1SA Objective 1: To improve human health and well-being Minor positive (+) The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). This site is currently used as a Livery area. Consisting of Stabling,Paddock and Manege area. There are no other facilities providing this in the locality. Removal of this from a rural location would make this a Significant negative to the stated objective SA Objective 2: To improve equality and access to community facilities and services Significant negative (--) The site is placed within the Poor Accessibility Band. Agreed as Significant negative SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society Uncertain minor negative (-?) The site is more than 800m of an existing secondary school and a primary school. However, uncertainty exists as the effects will depend on there being capacity available at those facilities to accommodate new pupils. It is also noted that the provision of new residential development could stimulate the provision of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain. All the existing secondary schools in the that area are over 800m. These are also only Boy single sex until 6th form, so any Schooling for secondary aged</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. All effects are correct.</p> <p>With regard to SA objective 1: health and well-being, the site has been appraised in line with the site assessment criteria. It receives a minor positive effect because it is within 800m of a an area of open space (Haysden Country Park) and a walking and cycle path.</p> <p>With regard to SA objective 3: education, the site has been appraised in line with the site assessment criteria and receives an uncertain minor negative effect due to the fact it is not located within 800m of a primary or secondary school.</p> <p>SA objective 4 relates to economic growth, not the Green Belt. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Girls will not be catered for. Also there are no public footpaths to this site, so the services can not be accessed safely on foot. This should therefore be a Significant negative.SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough Negligible (0)/Negligible (0) The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. This site has Green belt boundaries to the North,South and West and to the east is a Conservation area, so has a Significant negative in this objective.SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain minor negative (-?) The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial. This site is within 250m of a Green flag country park where light pollution and lack of mains sewage can cause a major impact. It is currently used for keeping horses that add biodiversity to the area, as they do not live elsewhere in the area and they attract all sorts of other species, that only live in horse grazed areas, so has a Significant negative to this Objective. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?) The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The local plan says the site is not near a rural settlement. This is incorrect, as it is adjacent to the Lower Haysden hamlet which is a Conservation area, is Greenbelt and used as a rural asset, so development would have a Significant Negative on this objective SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--?) The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. This is an open flat area that is catagorised as Flood zone. There is no uncertainty of the Development of 29 houses in this area will have a Significant negative on this Objective. SA Objective 8: To protect and enhance the quality of water features and resources Significant negative (--)/Uncertain significant negative (--?) The site is either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. There is no mains sewage supplied to this area and adjacent Hamlet and even with the use of modern sewage treatment plants, attempting to mitigate the effect of 29 houses, using this area to discharge treated sewage and the added</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, the site has been appraised in line with the site assessment criteria. It receives a minor negative effect because it is between 250m and 1km of two locally designated sites (Haysden Nature Reserve Local Nature Reserve and River Medway Local Wildlife Site) and an area of Ancient Woodland. The effect is recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to SA objective 7: historic environment, the site receives a significant negative effect because it abuts Hayden Conservation Area, which contains a number of heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the site falling within or partially within Source Protection Zones 2 and 3. The effect is recorded as uncertain, as the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>With regard to SA objective 9: soils, it is correct that the effect is recorded as uncertain because the uncertainty acknowledges the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classified as high quality). Please refer to the Agricultural Land Classification for further information on this.</p> <p>With regard to the landscape, site 59641 is already recorded as having a significant negative effect in relation to SA objective 6: landscape. All adverse effects against the landscape objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of a hamlet, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for this site is therefore correct. However, in the next iteration of the SA Report we will add this limitation to the 'Difficulties and Data Limitations' section of the report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the site falling within or partially within Source Protection Zones 2 and 3. The effect is recorded as uncertain, as the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>With regard to SA objective 9: soils, it is correct that the effect is recorded as uncertain because the uncertainty acknowledges the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classified as high quality). Please refer to the Agricultural Land Classification for further information on this.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>issue of a expected flood of these facilities every 30 years mean it is not uncertain that it will have a Significant negative on this objective. SA Objective 9: To conserve and enhance soil resources and guard against land contamination Uncertain significant negative (--) The site is greenfield land and contains a significant proportion (25%) of Grade 3 agricultural land. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Making this uncertain due to not knowing if this is Grade 3a or 3b is incorrect. Development of any grade 3 agricultural land is a Significant negative to this objective. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Negligible (0) The site is more than 800m from a railway station and more than 400m from a bus stop but has a cycle path within 400m. The Cycle path is a rural exercise route leading to Penshurst place. It does not give access to public amenities. Without footpaths it means transport to the amenities of Tonbridge can only be by car, so making it a Significant negative to the objective.</p>	<p>With regard to SA objective 10: climate change mitigation, the site has been appraised in line with the site assessment criteria. It is recorded as having a negligible effect as it is more than 800m from a railway station and more than 400m from a bus stop, but has a cycle path within 400m. The respondents comments regarding the cycle path are noted.</p>
42436577	Annex 1	<p>Site 59830: This vast area is owned by mineral extraction companies who are bound by their planning agreements to restore the land as green belt after the cessation of mineral extraction. Some of the pits have already been backfilled, but at least one contains deleterious material and this was pointed out in the comments made on the previous (and now withdrawn) draft local plan. As the site extends to 130 acres and will affect a much wider area should development be permitted, it would be much better to consider it as a number of smaller parcels of land, some of which might be suitable for different types of development. Another consideration is that mineral extraction is ongoing and the pits have many years' life in front of them, so some of the site will not be available for development until after the time horizon of this Local Plan. The proposals offered as part of the last local plan were unworkable and would have resulted in severe disruption to the local communities and end up as a new medium sized town with limited facilities and no defined centre, just a mess of housing estates and employment sites along a feeder road that was billed as a new bypass for Platt and Borough Green. Because the site is offered to avoid the restitution costs of making good the quarries, it does not mean that TMBC should use it to create a new town. Any development on this site needs to be in keeping with its surroundings and not overstress the infrastructure which has already passed breaking point. The site also contains areas which are in Flood Zone 3b where the risk of flooding was 1 in 20 years, but is now likely to be more frequent due to climate change. this category is the 'functional flood zone' where has to flow or be stored during time of heavy rainfall, so they are the areas where flooding is most likely and longest lasting. They are also the areas where surface water drainage may require pumps and the water table is close to the surface so a hole dug will quickly fill with water. The benefits and drawbacks listed in the interim sustainability report apply to different areas of the site and are meaningless in the context of such a large site, leading to the conclusion that it should be broken up into smaller parcels of land for</p>	<p>Noted.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		the appraisal so that the positives and negatives relate to specific areas within the overall site.	
42776289	Annex 1	<p>On behalf of our client, CEMEX UK Properties Ltd, please find enclosed representations to Tonbridge & Malling Borough Council's (hereafter referred to as 'the Council') Regulation 18 Local Plan (the 'Local Plan').CEMEX supports the decision to bring forward a new Local Plan as the importance of creating a Plan-led approach to planning for development cannot be understated given the Council's adopted Local Plan predates the National Planning Policy Framework ('NPPF'). A new Local Plan is therefore required to ensure the future needs of residents and businesses across the Borough can be met through the sustainable development of sites. These representations are consistent with those made to the previous iteration of the Local Plan that was withdrawn on 13 July 2021 and included submissions to the Regulation 18 (The Way Forward) in November 2016 and the Regulation 19 draft in November 2018. As part of the initial stage of the emerging Local Plan, the three sites as set out below were also submitted to the Council's first Call for Sites exercise in February 2022.CEMEX is a global building materials company and leading supplier of cement, ready-mixed concrete and aggregates. In the UK, CEMEX owns sites and land that have ceased to be in operational uses and where appropriate, these are now promoted for alternative uses some of which are in Aylesford and the extent of their ownership is shown on the plan below and is split into three sites:Site A – extends to approximately 8.2ha;Site B – extends to approximately 9.7ha; and Site C – extends to approximately 0.6ha.To note-- the plan showing the location of the sites are included within the submission sent to the Council. DEVELOPMENT POTENTIAL As part of the adopted Development Plan, the area around Eccles was designated as within the Bushey Wood Area of Opportunity-- Core Strategy Policy CP16 and this stated:"Land at Bushey Wood is identified as an Area of Opportunity containing land with potential for meeting residential needs in the post 2021 period, or earlier if there is any significant shortfall in strategic housing provision. Land will only be released for housing development within the Area of Opportunity through the preparation of an Area Action Plan. In the meantime, development will not be proposed in the LDF or otherwise permitted within this area which might prejudice its long-term development potential." In consideration of the position set by the Core Strategy, the withdrawn Local Plan had continued with land at Eccles/Bushey Wood forming part of the preferred spatial approach for development and within the associated evidence base, CEMEX's landholding (as set out above) were included as part of the Strategic Land Availability Assessment ('SLAA') reference 199 – Bushey Wood. This Report concluded that Bushey Wood was:"located in a sustainable location, with good access to services. The site is a mixture of greenfield and previously developed land, and any development should seek to maximise PDL opportunities. The majority of the site is identified as an Area of Opportunity in the adopted development plan for residential development post 2021, and therefore the principle of development in this location is already established. The scale of the site would</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report. This means that each reasonable alternative development site option is appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondents comments on SA objective 1: health and wellbeing, housing provision is dealt with separately under SA objective 14: housing. Although the respondent has said that development will incorporate areas of public open space, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p> <p>With regard to SA objective 2: services and facilities, sites 59766 and 59763 are recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band and therefore receives a significant negative effect against this objective.</p> <p>With regard to SA objective 3: education, site 59766 receives an uncertain minor negative effect for the reasons outlined in the proforma. Although the respondent has said that financial contributions would be made to mitigate any likely impact of the site in respect of education provision, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59766 and 59763 receive uncertain significant negative effects as they form part of a Regionally Important Geological Site (Aylesford Pit) and are within close proximity of a locally designated site (Eccles Old Pits Local Wildlife Site). Although the respondent has said that the sites would deliver at least a 10% net gain in biodiversity, these are 'policy-off' appraisals that do not take into consideration mitigation. With regard to SA objective 6: landscape, sites 59766 and 59763 are recorded as uncertain significant negative because they are not located within or on the edge of a settlement. The uncertainty is due to the fact the actual effect will depend on the final design, scale and layout of development. Although the respondent has said that there would be a robust landscaping strategy, these are 'policy-off' appraisals that do not take into consideration mitigation.</p> <p>With regard to SA objective 7: historic environment, these are 'policy-off' appraisals that do not take into consideration mitigation. Sites 59766 and 59763 receive uncertain significant negative effects in relation to this objective because they contains and are located within</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>enable a range of infrastructure, open space, and affordable housing to be provided on-site to meet a range of local plan and sustainability appraisal objectives over the medium to long term, as well as potential for further development beyond this plan period". As set out in previous representations and repeated through the 2022 Call for Sites, in consideration that each of the sites are deliverable in that they are available (single landowner), suitable (conclusions of previous Sustainability Appraisal/SLAA) and achievable (realistic prospect that housing will be delivered within five years), it is considered that they should be allocated in the emerging Local Plan/form part of the strategic extension to Eccles. Further, with the current planning application (22/00113/OAEA) which includes land that would adjoin Sites B and C, in order for the Council to maximise the delivery of housing at sustainable locations (as confirmed through the previous evidence base), we suggest both sites (B and C) should be allocated in the emerging Local Plan. The Sites are assessed under references 59766 (Site A), 59763 (Site B) and 59768 (Site C) and there are some parts of the Interim Sustainability Appraisal Site Assessments that we agree and support, whilst others we consider incorrect. Our comments on the relevant objectives (that we do not agree with) are outlined below. Site A: 59766 SA Objective 1: To improve human health and well-being The proposal would facilitate improved health and well-being by providing much needed housing, and in particular affordable housing which helps to reduce deprivation and social inequalities. As set out within these representations, the Site was also within a previously assessed 'Area of Opportunity' and concluded to be sustainable by the Council (as part of the evidence base of the last Local Plan. In terms of the development of the Site, it would include areas of public open space in accordance with planning policy. It is also relevant to note that should the planning application (22/00113/OAEA) be approved, there would be opportunities for residents to use the associated areas (alongside the development of Site A providing contributions to enhance further and/or deliver additional services/facilities in the local area). There would also be opportunities to improve connections to a wider network of green spaces to promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure. We therefore suggest the Site is scored '++' (significant positive effect likely) rather than + (minor positive effect likely). SA Objective 2: To improve equality and access to community facilities and services Given the Council's assessment in respect of SA Objective 1 and our subsequent re-assessment, we suggest the Site is scored '+' (minor positive effect likely) rather than - (significant negative effect likely). SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society. The necessary financial contributions would be made to mitigate any likely impact of the Site in respect of education provision. We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (-?) Uncertain minor negative. SA Objective 5: To protect and enhance biodiversity and geodiversity In accordance with the emerging Local Plan alongside the legislation within the</p>	<p>close proximity of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, site 59766 receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. Further to this, the site partially overlaps a water body in Bushey Wood and therefore development of the site could have an adverse effect on water quality, although this is uncertain. Site 59763 also receives an uncertain significant effect as it is within an area with a 1 in 30 year risk of surface water flooding. The site does not contain a water body or watercourse, but partially falls within Source Protection Zone 3. Although the respondent has said that the scheme could include SuDS and other mitigation, these are 'policy-off' appraisals that do not take into consideration mitigation. With regard to SA objective 10: climate change mitigation, although the respondent has said that there could be opportunities to deliver a new bus service, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Environment Act, the development of the Site would need to deliver at least a 10% net gain in biodiversity. As part of bringing forward the biodiversity net gain strategy/plan, in accordance with the NPPF (paragraph 180), it would also be necessary to apply the avoidance strategy. This will ensure biodiversity and geodiversity is protected and enhanced. We therefore suggest the Site is scored '++' (significant positive effect likely) rather than (--?) Uncertain significant negative. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Whilst the character of the Site would change (development of a greenfield site), with a robust landscaping strategy and careful layout, it is suggested that the long-term impact would be minimal/negligible. We therefore suggest the Site is scored '-' (minor negative effect) rather than (--?) Uncertain significant negative. SA Objective 7:To protect and enhance the cultural heritage resource Ensuring the setting of the Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles would not be harmed would form a key component of the layout of the Site. It is suggested with the intervening Bushey Wood alongside additional mitigation that would be incorporated into the development, the heritage asset would not be affected. We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--?) Uncertain significant negative. SA Objective 8:To protect and enhance the quality of water features and resources None of the Site is within Flood Zone 3, rather, the entirety is within Flood Zone 1 – the area with the lowest probability of flooding. The area to the west also benefits from flood defences. As part of the development of the Site, a strategy would be developed that ensured the surrounding area would not be affected. This could include SUDs and other mitigation on-site. We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--) Significant negative/ (--?) Uncertain significant negative. In light of the above, we consider the Interim Sustainability Assessment Report scores for the Objectives as listed above should be higher than that set out within the assessment. We therefore request the Interim Sustainability Appraisal for Site A is reviewed by the Council and amended in accordance with the above. Site B: 59763 SA Objective 1: To improve human health and well-being. The proposal would facilitate improved health and well-being by providing much needed housing, and in particular affordable housing which helps to reduce deprivation and social inequalities. As set out within these representations, the Site was also within a previously assessed 'Area of Opportunity' and concluded to be sustainable by the Council (through the previous Local Plan).In terms of the development of the Site, it would include areas of public open space in accordance with planning policy. It is also relevant to note that should the planning application (22/00113/OAEA) be approved, there would be opportunities for residents to use the associated areas (alongside the development of Site A providing contributions to enhance further and/or deliver additional services/facilities in the local area). There would also be opportunities to improve connections to a wider network of green spaces to promote healthy lifestyles through connecting people with nature and promoting high standards of</p>	

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		<p>Green Infrastructure. We therefore suggest the Site is scored ‘++’ (significant positive effect likely) rather than + (minor positive effect likely).SA Objective 2: To improve equality and access to community facilities and services. Given the Council’s assessment in respect of SA Objective 1 and our subsequent re-assessment, we suggest the Site is scored ‘+’ (minor positive effect likely) rather than – (significant negative effect likely). SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society. The necessary financial contributions would be made to mitigate any likely impact of the Site in respect of education provision. We therefore suggest the Site is scored ‘0’ (Negligible effect likely) rather than (-?) Uncertain minor negative. SA Objective 5:To protect and enhance biodiversity and geodiversity. In accordance with the emerging Local Plan alongside the legislation within the Environment Act, the development of the Site would need to deliver at least a 10% net gain in biodiversity. We therefore suggest the Site is scored ‘++’ (significant positive effect likely) rather than (--?) Uncertain significant negative. SA Objective 6:To protect and enhance the borough’s landscape and townscape character and quality. Whilst the character of the Site would change (development of a greenfield site), with a robust landscaping strategy and careful layout, it is suggested that the long-term impact would be minimal/negligible. We also suggest that should the planning application (22/00113/OAEA) to the north be permitted, the development of the Site (which would adjoin the Site to the north) would be seen in the context of Eccles/the existing built form. We therefore suggest the Site is scored ‘-’ (minor negative effect) rather than (--?) Uncertain significant negative. SA Objective 7:To protect and enhance the cultural heritage resource. Ensuring the setting of the Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles would not be harmed would form a key component of the layout of the Site. It is suggested with the intervening Bushey Wood to the northwest alongside additional mitigation that would be incorporated into the development, the heritage asset would not be affected. We therefore suggest the Site is scored ‘0’ (Negligible effect likely) rather than (--?) Uncertain significant negative. SA Objective 8:To protect and enhance the quality of water features and resources. None of the Site is within Flood Zone 3, rather, the entirety is within Flood Zone 1 – the area with the lowest probability of flooding. As part of the development of the Site, a strategy would be developed that ensured the surrounding area would not be affected. This could include SUDs and other mitigation on-site. We therefore suggest the Site is scored ‘0’ (Negligible effect likely) rather than (--) Significant negative/ (--?) Uncertain significant negative.SA Objective 10:To reduce greenhouse gas emissions so as to minimise climate change. Whilst the Site is more than 800m from a railway station and 400m from a bus stop, with the critical mass that may come forward (in this area), there could be opportunities (in discussions with the local bus provider) to deliver a new bus service. We therefore suggest that the Site is scored ‘?’ (Likely effect uncertain) rather than (-).In light of the above, we consider the Interim Sustainability Assessment Report scores for the</p>	

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		Objectives as listed above should be higher than that set out within the assessment. We therefore request the Interim Sustainability Appraisal for Site B is reviewed by the Council and amended in accordance with the above. Site C: 59768 Given the size and proximity of Site C, we have not provided a re-assessment.	
42786433	Annex 1	<p>Response to Site Proposal Number 59811 – land surrounding Oxon Hoath estate, Hadlow. I strongly object to the above site being included in the TMBC Local Plan for the reasons given below: This site sits within established Green Belt Land. Paragraph 140 of the NPPF states: “Once established Green belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified”. It goes on to say that “the policy making authority should be able to demonstrate that it has examined fully all other reasonable options” these include: “suitable brownfield sites” and “other locations well served by public transport” etc. This site sits firmly in a rural area, on an isolated site away from any existing dwellings, surrounded by country lanes, no public transport and within the Green Belt. Furthermore, the Report on Urban Capacity Study undertaken by Urban Intelligence for TMBC in July 2022 has gone some way in identifying potential sites for TMBC to reach the housing requirement within the borough by 2040. This states that TMBC is 71% covered with Green Belt Land. This study has identified sites within the existing urban areas and rural service centres, most importantly looking at suitability, capacity and density optimisation in the most accessible locations. They have identified a number of potential sites. Page 3 states “No sites were identified in the rural service centres of Hildenborough and Hadlow”. Page 29 Summarises findings for Hadlow – Point “7.1-- No sites identified by Hadlow”. They did however find other potential sites in the borough. Therefore site 59811 has not been recommended in a hugely detailed study, undertaken by a company paid by TMBC, with the expertise required to advise them on urban capacity and viability analysis. The 5 purposes of Green Belt designation are: To restrict unrestricted urban sprawl, Prevent coalescence of neighbouring settlements, Safeguarding the countryside, Protect the setting and character of historic towns, Assist or encourage urban regeneration. As stated above by Urban Intelligence there are far more suitable sites within the TMBC local area requiring urban regeneration and which are far better served by public transport and access routes than site 59811. Accessibility – this site is served by narrow, winding and at times, single track lanes to all sides. There is no public transport provided by TMBC to any area near the site. In fact local bus services are currently being reduced to both Hadlow (over 1 mile away to the nearest corner of this site) on the east and Dunks Green/Plaxtol to the West. Traffic congestion is already a problem on the A26 through Hadlow, as is road safety for the local residents, primary school and secondary school children and staff. This small village and local area cannot support any additional traffic that dwellings on the surrounding areas would generate – particularly due to the lack of public transport and inadequate infrastructure. As Stated in the SA Objective 2: Significant Negative: The site is placed within the Poor Accessibility Band. Which</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to the capacity of GP surgeries and schools, this is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The map of site 59811 is solely used to show where it's located within the borough and so does not show any assets or constraints.</p>

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		<p>is an understatement – cars, lorries and buses cannot pass each other with clear passage on any of the surrounding roads. Utilities – local houses recently received letters from Southern Water stating that Kent is a stressed area and all houses, particularly those to the North of site 58911 regularly experience significant water supply issues. The site currently has electricity to only two dwellings and no mains gas supply. To significantly enhance the utilities supplied to this site would cause largescale disruption to the surrounding landscape and communities, putting pressure on already limited services and having huge environmental impact. Impact on Environment – the land identified in site 58911 currently sits to the west of Hadlow and contains open rural land, rivers, woods and wildlife habitats. There are frequent sightings of owls, buzzards, bats and badgers. To disturb badgers and bats is a criminal offence. The site also includes ancient trees and rivers providing sanctuary for local wildlife. Trees and green spaces are integral to combatting the climate crisis and should be preserved as much as possible, they release oxygen and help to combat pollution. The loss of the trees on this site, were a development be allowed, will expose local residents to increased pollution levels, not least adding to the already increased pollution levels due to traffic. As stated in SA Objective 5: To Protect and enhance Biodiversity & Geodiversity: Significant Negative – the site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Local amenities – we understand the local Doctors surgery and schools are at capacity. They cannot accommodate any more residents in the local area of Hadlow or the surrounding villages. As stated in SA Objective 3: Minor Negative – The site is more than 800m from an existing secondary school and a primary school. There are no bus services going anywhere near this site, nor public footpaths into the village of Hadlow from this site. Children would have to walk over a mile to school along the roads with no pavements.194oesn't194y194yt Heritage Building – The map of site 59811 does not mark the situation of the Grade II* Listed Mansion House of the Oxon Hoath estate and 16th Century Grade II* Listed Dower house. These are buildings in total of over 30,000 sq ft with historic parkland and a Georgian walled garden. The gardens are Grade II* listed and extend to 74 acres. The gardens contain the only surviving unaltered parterre gardens in England today. As stated in SA Objective 7: To protect and enhance the cultural heritage resource – Significant negative: the site is located within 250m of a heritage asset. A considerable understatement! As per the Stage 2 Green Belt Assessment review undertaken by ARUP for TMBC in July 2022, TMBC must demonstrate strategic level exceptional circumstance to justify the release of Green Belt Land as well as exceptional circumstances for the release of specific sites. This must be linked with the Local Plan Strategy, the reasonable alternatives for delivering growth (as assessed through the Sustainability Appraisal) as well as the findings from the Green Belt Reviews and site assessment. Page 15 of ARUP's report – Figure 3.3 shows the majority of Site 59811 consisting of Parks and Gardens sitting within the Green Belt. With Ancient and Semi Natural Woodland to the North and East. They go on to state on</p>	

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		<p>Page 16 – “The location within the Green Belt, combined with the tightly drawn boundaries, minimises the potential for the settlements to accommodate growth over the long-term”. SA Objective 8: To protect and enhance the quality of water features and resource – significant negative. The site is either entirely or significantly within Flood Zone 3. The site also contains a water body or water course or falls within or partially within Source Protection Zone 1. In summary, we believe that this rural parcel of Green Belt land that contains a significant Listed Grade II* heritage asset and listed parklands as well as ancient woodland, with very poor access, utility provision and amenities is not suitable for TMBC to consider as a site within the local development plan.</p>	
42798497	Annex 1	<p>SITE ID 59641. I have written my comments in bold following the existing comments contained in Annex 1SA Objective 1: To improve human health and well-being Minor positive (+)The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). There is a huge park nearby so this is not required for human health at all. Indeed, It is located 2km from a train station and the road has no pedestrian area and a 40mph speed limit with blind corners, so is very unsafe for people to walk along to the site. There is no parking. This is therefore a Significant negative to the stated objective. SA Objective 2: To improve equality and access to community facilities and services Significant negative (-) The site is placed within the Poor Accessibility Band. Agreed as Significant negative SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society Uncertain minor negative (-?)All the existing secondary schools in the that area are over 800m and are Boy single sex until 6th form, so any Schooling for secondary aged Girls will not be catered for. Also there are no public footpaths to this site as stated above, so the services can not be accessed safely on foot. The nearest train station is 2000m away and the road people would walk down has a 40mph speed limit and multiple blind corners. This should therefore be a Significant negative. SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough Negligible (0)/Negligible (0)The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. This site has Green belt boundaries to the North, South and West and to the East is a Conservation area, so has a Significant negative in this objective.SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain minor negative (-?). The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial. This site is within 250m of a Green flag country park where light pollution and lack of mains sewage can cause a major impact. It is currently used for keeping horses that add biodiversity to the area, as they do not live</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the SA acknowledged that the site is within 800m of an area of open space.</p> <p>With regard to SA objective 3: education, the SA records the site as not falling within 800m of a secondary school or a primary school.</p> <p>With regard to the landscape, site 59641 is already recorded as having a significant negative effect in relation to SA objective 6: landscape. All adverse effects against the landscape objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of a hamlet, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for this site is therefore correct. However, in the next iteration of the SA Report we will add this limitation to the 'Difficulties and Data Limitations' sections of the report. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 9: soils, it is correct that the effect is recorded as uncertain because the uncertainty acknowledges the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classified as high quality). Please refer to the Agricultural Land Classification for further information on this.</p>

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		<p>elsewhere in the area and they attract many other species that only live in horse-grazed areas, so has a Significant negative to this Objective. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--)The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The local plan says the site is not near a rural settlement. This is incorrect, as it is adjacent to the Lower Haysden hamlet which is a Conservation area, is Greenbelt and used as a rural asset, so development would have a Significant Negative on this objective. SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--)The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. This is an open flat area that is catagorised as Flood zone. There is no uncertainty of the Development of 29 houses in this area will have a Significant negative on this Objective. SA Objective 8: To protect and enhance the quality of water features and resources Significant negative (--)Uncertain significant negative (--)The site is either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. There is no mains sewage supplied to this area and adjacent Hamlet and even with the use of modern sewage treatment plants, attempting to mitigate the effect of 29 houses, using this area to discharge treated sewage and the added issue of a expected flood of these facilities every 30 years mean it is not uncertain that it will have a Significant negative on this objective. SA Objective 9: To conserve and enhance soil resources and guard against land contamination Uncertain significant negative (--)The site is greenfield land and contains a significant proportion (25%) of Grade 3 agricultural land. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Making this uncertain due to not knowing if this is Grade 3a or 3b is incorrect. Development of any grade 3 agricultural land is a Significant negative to this objective.SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Negligible (0)The site is more than 2000m from a railway station and more than 400m from a bus stop but has a cycle path within 400m. The Cycle path is a rural exercise route leading to Penshurst Place. It does not give access to public amenities. Without footpaths it means transport to the amenities of Tonbridge can only be by car. The road people would walk down has a 40mph speed limit and multiple blind corners, so making it a Significant negative to the objective.</p>	

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42801377	Annex 1	<p>SITE ID 59641. I have written my comments in bold following the existing comments contained in Annex 1SA Objective 1: To improve human health and well-being Minor positive (+). The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both).This site is currently used as a Livery area. Consisting of Stabling,Paddock and Manege area. There are no other facilities providing this in the locality. removal of this from a rural location would make this a197oesn't197y197yt negative to the stated objective. SA Objective 2: To improve equality and access to community facilities and services Significant negative (--). The site is placed within the Poor Accessibility Band. Agreed as Significant negative. SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society Uncertain minor negative (-?). The site is more than 800m of an existing secondary school and a primary school. However, uncertainty exists as the effects will depend on there being capacity available at those facilities to accommodate new pupils. It is also noted that the provision of new residential development could stimulate197oesn't197y197y197yn of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain. there are no public footpaths to any of the schools so the services cannot be accessed safely on foot. This should therefore be a Significant negative.SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough Negligible(0)/Negligible (0). The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. This site has Green belt boundaries to the North,South and West and to the east is a Conservation area, so has a Significant negative in this objective. SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain minor negative (-?) The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial. This site is within 250m of a Green flag country park where light pollution and lack of mains sewage can cause a major impact. It is currently used for keeping horses that add biodiversity to the area, as they do not live elsewhere in the area and they attract all sorts of other species, that only live in horse grazed areas, so has a Significant negative to this Objective. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?) The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The local plan says the site is not near a rural settlement. This is incorrect, as it is adjacent to the Lower Haysden hamlet which is a Conservation area,</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. All effects are correct.</p> <p>With regard to SA objective 3: education, this objective solely looks at distance to schools and not the presence of Public Rights of Way. The SA is too high-level to give consideration to specific Public Rights of Way.</p> <p>SA objective 4 relates to economic growth, not the Green Belt. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site has been appraised in line with the site assessment criteria. It receives a minor negative effect because it is between 250m and 1km of two locally designated sites (Haysden Local Nature Reserve and River Medway Local Wildlife Site) and an area of Ancient Woodland. The effect is recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to the landscape, site 59641 is already recorded as having a significant negative effect in relation to SA objective 6: landscape. All adverse effects against the landscape objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of a hamlet, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for this site is therefore correct. However, in the next iteration of the SA Report we will add this limitation to the 'Difficulties and Data Limitations' section of the report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the site falling within or partially within Source Protection Zones 2 and 3, in addition to the fact the extent to which water quality is affected</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>is Greenbelt and used as a rural asset, so development would have a Significant Negative on this objective. SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--?). The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. This is an open flat area that is catagorised as Flood zone. There is no uncertainty of the Development of 29 houses in this area will have a Significant negative on this Objective. SA Objective 8: To protect and enhance the quality of water features and resources Significant negative (--)/Uncertain significant negative (--?) The site is either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. The site contains a waterbody or water course or falls within or partially within Source Protection Zone 1.However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. There is no mains sewage supplied to this area and adjacent Hamlet and even with the use of modern sewage treatment plants, attempting to mitigate the effect of 29 houses, using this area to discharge treated sewage and the added issue of a expected flood of these facilities every 30 years mean it is not uncertain that it will have a Significant negative on this objective. SA Objective 9: To conserve and enhance soil resources and guard against land contamination Uncertain significant negative (--?). The site is greenfield land and contains a significant proportion (25%) of Grade 3 agricultural land. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade3a (high quality) or 3b (not classed as high quality). Making this uncertain due to not knowing if this is Grade 3a or 3b is incorrect. Development of any grade 3 agricultural land is a Significant negative to this objective.SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Negligible (0. The site is more than 800m from a railway station and more than 400m from a bus stop but has a cycle path within 400m. The Cycle path is a rural exercise route leading to Penshurst place. It does not give access to public amenities. Without footpaths it means transport to the amenities of Tonbridge can only be by car, so making it a Significant negative to th198oesn'tctive.</p>	<p>depends on construction techniques and the use of SuDS within the design.</p> <p>With regard to SA objective 9: soils, it is correct that the effect is recorded as uncertain because the uncertainty acknowledges the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classified as high quality). Please refer to the Agricultural Land Classification for further information on this.</p> <p>With regard to SA objective 10: climate change mitigation, the site has been appraised in line with the site assessment criteria. It is recorded as having a negligible effect as it is more than 800m from a railway station and more than 400m from a bus stop, but has a cycle path within 400m. The respondents comments regarding the cycle path are noted.</p>
42802177	Annex 1	<p>Given the inconsistent numbering, it is difficult to assess the combined impact on the village of Hildenborough of the 23 sites listed for development. It would appear that there is the belief that there is the potential for at least 2,120 homes, covering 268 hectares of mostly green belt land; this is more than 1% of the whole of Tonbridge and Malling. The B245, and other local services and infrastructure, cannot easily be scaled up to support this scale of additional development. The assessment criteria for the individual sites seems inconsistent, and it seems off to equally weight the criteria which is the implicit methodology. It would seem evident that ALL of the Hildenborough sites fail to deliver key sustainability objectives (as defined in the SA framework): SA Objective 1-- To improve human health and well-being; SA Objective 2-- To improve equality and access to community</p>	<p>All sites are considered reasonable alternative development site options. All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59669 is not assessed in the SA as having a significant positive effect in relation to SA objective 1: health and wellbeing. It is recorded as having a mixed uncertain significant negative and minor positive effect. However, in the next iteration of the SA Report this will be amended to a minor positive effect only. The uncertain significant</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facilities and services; SA Objective 4-- To encourage sustainable economic growth, business development, and economic inclusion across the borough; SA Objective 5-- To protect and enhance biodiversity and geodiversity; SA Objective 6-- To protect and enhance the borough's landscape and townscape character and quality. The Sustainability Appraisal Report correctly identifies 4 out of 23 Hildenborough sites as being less sustainable than others as they are expected to have significant negative effects across at least six different SA Objectives. Given Hildenborough's unique situation, and dearth of services, it is suggested that more sites should be considered similarly as reflected in recent planning reports. As an example: It is unclear why Site 59669 is assessed to have a 'significantly positive' impact on SA Objective 1; Site 59679 should be assessed to be in a Poor Accessibility Band (as Site 59669); Planning permission was refused for site 59669 in Oct 21 (TM/21/02831/FL, TM/21/02834/LB). The 'employment development' benefits were shown to be minimal, at best.</p>	<p>negative effect was as a result of the site containing an area of open space. However, the site does not contain an open space, just overlaps one. The GIS analysis will be refined so that sites overlapping open spaces will not be recorded as containing open spaces. The site receives a minor positive effect because it is within 800m of an existing area of open space and walking paths.</p> <p>In the Urban Capacity Study (July 2022), site 59679 is recorded as falling within the Good Accessibility Band whereas site 59669 is recorded as falling within the Poor Accessibility Band. This information has fed into the SA.</p>
25406913	Annex 1	<p>Within Annex 1: Reasonable alternative development site options of the Sustainability Appraisal there are some important factual inaccuracies which skew the assessment of FECL submitted sites. We set out below the corrected facts. Site 59825 Land north of Back Lane, Shipbourne (5 Acre Field)SA states: "The Site is within an area of open space or currently accommodates a sports facility and this may be lost as a result of development" Correction: There is no public access to this site, it is private land owned by the Fairlawne Estate. There are no public footpaths crossing the site nor are there any sports facilities to be lost. SA states: "The Site includes employment development smaller than 5ha in size." Correction: This is not applicable given only residential development is proposed and there are no existing employment uses on the site. Site 59823Oast Lane, Tonbridge SA states: "The Site is located in the Fair Accessibility Band".Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilities in the Town, the site must logically be placed in a higher accessibility zone. The SA states: "The Site includes employment development smaller than 5ha in size." Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. The SA states: "The site contains an existing green infrastructure asset that could be lost as a result of new development". Correction: The site contains no green infrastructure asset, adjoins the built-up edge of Tonbridge, is not a designated open space and has no public access. SA states: "The Site is either entirely</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, site 59825 is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Shipbourne Common) and so the GIS analysis identified the site as containing an open space. The GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA Report, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>Sites 59825, 59823 and 59821 have been appraised as mixed use sites. The positive effects these sites are expected to have in relation to SA objective 4: economic growth are as a result of the fact these sites would include employment development.</p> <p>Following discussions with Tonbridge and Malling Borough Council, site 59825 will be reappraised as a residential site.</p> <p>Sites 59823 and 59821 are recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. Site 59804 is recorded as falling within the Good Accessibility Band and site 59801 is recorded as falling within the Poor Accessibility Band. This information has fed into the SA.</p> <p>Site 59823 does contain an existing green infrastructure asset in the form of a line of woodland/thick vegetation to its south east.</p> <p>With regards to SA objective 8: water, sites 59823, 59779 and 59801 receive a mixed significant negative and negligible effect. The significant negative effect is as a result of the sites falling within an</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. SA states: "The Site is within a Minerals Safeguarding Area". Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within any minerals safeguarding area. Site 59821 Oast Lane, Tonbridge SA states: "The Site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development."</p> <p>Correction: The site is not a designated open space, has no public access and does not accommodate a sports facility. SA states: "The Site is placed in the Fair Accessibility Band." Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilitates in the Town, the site must logically be placed in a higher accessibility zone. SA states: "The site includes employment development more than 5ha in size."</p> <p>Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. SA states: "The Site is not located near to any settlements in rural locations." Correction: The statement is nonsensical. The site adjoins the built-up edge of the principal urban area of Tonbridge. A highly sustainable location. SA states: "The Site is either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources SA states: "The site is within a Minerals Safeguarding Area." Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within a minerals safeguarding area (it is in close proximity). Site 59778 Allotment Site, The Street, Plaxtol SA states: "The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development." Correction: The Site does not accommodate outdoor sports facilities; however it does include a private allotment site. The land which accommodates the allotments is wholly owned by the Fairlawne Estate and the allotments could be retained or relocated if required. Site 59779 School Field, Back Lane, Shipbourne SA states:</p>	<p>area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the sites not containing a water body or watercourse or falling within a Source Protection Zone. Sites 59821 and 59804 receive an uncertain significant negative effect. This is because site 59821 falls within an area with a 1 in 30 year risk of surface water flooding and partially falls within Source Protection Zone 2. Site 59804 falls within an area with a 1 in 30 year risk of surface water flooding, in addition to containing a watercourse and slightly overlapping Source Protection Zone 3.</p> <p>Sites 59823, 59821 and 59801 are identified as falling within a Minerals Safeguarding Area. Therefore, they receive an uncertain minor negative effect in relation to SA objective 13: material assets.</p> <p>With regard to SA objective 1: health and wellbeing, site 59821 is also incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Tonbridge Farm Sportsground) and so the GIS analysis identified the site as containing an open space. The GIS analysis will be refined so that sites that slightly overlap an open space will not be picked up as containing that open space. In the next iteration of the SA Report, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 6: landscape and townscape, site 59821 is incorrectly recorded as having a significant negative effect in relation to this objective. In the next iteration of the SA, this effect will be upgraded to a minor negative effect as the site is located on the edge of the settlement of Tonbridge.</p> <p>It is correct that site 59778 receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing, as it contains an open space in the form of allotments. Although the respondent notes that the land which accommodates the allotments (owned by the Fairlawne Estate) could be retained or relocated, these are 'policy-off' appraisals of the sites that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA acknowledges that site 59779 is within 250m of Ancient Woodland through the sentence "The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites". LUC acknowledge that this sentence does not explicitly refer to Ancient Woodland, even though Ancient Woodland was included in the GIS analysis. In the next iteration of the SA, the sentence will be revised to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites or Ancient Woodland". The SA will also acknowledge the fact the site contains Shipbourne Common Local Wildlife Site.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of Shipbourne,</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>"The Site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites." Correction: The edge of the site is located 210m from ancient woodland (at its closest point). No other internationally or nationally designated biodiversity or geodiversity sites have been identified within 250m SA states: "The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces." Correction: The Site is directly adjacent to the built-up part of Shipbourne which has a number of facilities including Shipbourne County Primary School and tennis courts, a village hall and a public house. The site is not a designated open space and no loss would result from its development. SA states: "The site is entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. Site 59804 West of Tonbridge Strategic Development Area SA states: "The site is within an area of open space or currently accommodates an outdoor sports facility which may be lost as a result of development" Correction: The site is not a designated open space, has no public access and does not accommodate a sports facility. A cricket pitch is east of the site but would be unaffected by the development of the site. SA states: "The site is placed within the Good Accessibility Band." Correction: The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within walking distance to a broad range of services and facilities including a convenience store, schools, sports facilities and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilitates in the Town, the site must logically be placed in a higher accessibility zone. At the very least the Site should be in the 'Very Good' accessibility band. SA states: "The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces." Correction: The site adjoins the built-up edge of Tonbridge, is not a designated open space and has very limited public access. SA states: "The site is entirely or significantly (i.e. >25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, only a very small part of the site falls within Flood Zone 3 and is predominantly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. SA states: "The site is within a Minerals Safeguarding Area." Correction: The sub-alluvial deposits safeguarding area covers only a very small section of the site. Site 59801 Land at NW Tonbridge SA states: "The site is placed within the Poor Accessibility Band."</p>	<p>sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct. In the next iteration of the SA, we will add this limitation to the section entitled 'Difficulties and Data Limitations'.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not state that site 59779 comprises open space.</p> <p>However, site 59804 does contain an open space, as acknowledged in the SA. Frogbridge Wood is located in its north eastern corner.</p> <p>As only a small percentage of site 59804 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, we will refine the GIS analysis so that sites where there is very little overlap with existing settlements are still recorded as bordering those settlements. However, the effect will remain the same, as the site contains an open space that could be lost as a result of development.</p> <p>With regard to SA objective 7: historic environment, site 59801 is located within 250m of a heritage asset (Horns Lodge), as recorded in the Kent Historic Environment Record.</p> <p>As only a small percentage of site 59801 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, the site will receive an uncertain minor negative effect in relation to SA objective 6: landscape and townscape.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Correction: The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilities in the Town, the site must logically be placed in a higher accessibility zone. At the very least the Site should be in the 'Very Good' accessibility band. SA states: "The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces."</p> <p>Correction: The site adjoins the built-up edge of Tonbridge, is not a designated open space and has very limited public access. SA states: "The Site is located within 250m of a heritage asset." Correction: The Site is not within 250 of a Listed Building, Conservation Area or Scheduled Monument SA states: "The site is entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. SA states: "The site is within a Minerals Safeguarding Area" Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the Site is not within any minerals safeguarding area.</p>	
42824737	Annex 1	<p>Site ID 59811 We set below a response to the TMBC assessment of site 59811 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. The site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 2,362 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. Furthermore, the site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). It is noted however that there are concerns with regards to the following: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore in our view incorrect; The TMBC assessment also states that this site contains a water body, or water course, or falls within or partially within Source Protection Zone 1; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site contains some water bodies but it is uncertain what effect development might have on these in terms of water quality.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 9: soils, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>It is noted that there may be an opportunity for mineral extraction prior to development.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>therefore 'Negligible' in relation to Objective 8. The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on four SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character), 7 (cultural heritage) and 9 (soil resources/ground contamination). However, as recognised in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objective 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects. These issues could therefore be overcome or addressed in the scheme development; It is noted that the TMBC assessment does not establish whether this site is Grade 3a (high quality) or 3b (not classed as high quality) and so further assessment would be required (SA Objective 9); This site is also within a Mineral Safeguarding Area (SA Objective 13)203oesn'ts are 'uncertain minor negative' at this stage. Given the uncertainty around the effects on these SA Objectives. However, it is recognised by TMBC that there may be an opportunity for mineral extraction in advance of development; It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development of this scale would be expected to incorporate the provision of new community facilities, services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage based on these objectives. In conclusion, this site has a clear advantage in being able to make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. The conclusions drawn in relation to SA Objective 8 are in our view incorrect. Against the other objectives we note six of the nine negative SA Objective scores are considered to be 'uncertain' at this time or it is recognised that a future scheme development could address the concerns raised. Given the significant potential of this site, it would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59806 We set out below a response to the TMBC assessment of site 59806 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. TMBC has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that the site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 3,289 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality).There are concerns with regards to several conclusions of the</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site contains some water bodies but it is uncertain what effect development might have on these in terms of water quality. It is</p>

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		<p>TMBC assessment as follows: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the majority of the site is flood zone 1, with only the southernmost part within flood zone 3 (SA Objective 8). Development could therefore be directed to areas of low flood risk in northern parts of the site; The TMBC assessment states that the site contains a water body, or water course, or falls within or partially within Source Protection Zone 1; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation to Objective 8. The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), a development of this size could be concentrated on land of lowest agricultural value; Whilst the site is considered to be within an area of open space (SA Objective 1), this could also be integrated into a residential scheme of this scale; The site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development of this scale could incorporate the provision of new community facilities, services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage in relation to these particular criteria. In conclusion, the site would make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Furthermore, six of the nine negative SA Objective scores are uncertain at this time. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	<p>noted that development within the site could be directed towards areas of low flood risk. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis. The same applies with regards to the Agricultural Land Classification and open space.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation.</p>
42824737	Annex 1	<p>Site ID 59747. We set out below a response to the TMBC assessment of site 59747 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. TMBC has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>significant positive effect was likely in relation to housing supply). Given the site could provide circa. 210 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA and is not within a Mineral Safeguarding Area, so would have a negligible effect on SA Objective 12 (air quality) and SA Objective 13 (mineral safeguarding area) respectively. It is noted however that there are concerns with regards to the following: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore incorrect in our view; The TMBC assessment also states that this site contains a water body, or water course, or falls within or partially within Source Protection Zone 1 (likely at the eastern edge of the site); however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation Objective 8. The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on four SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character), 7 (cultural heritage) and 9 (soil resources/ground contamination). However, as recognised in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects. These issues could therefore be overcome or addressed in the scheme development; It is noted that the TMBC assessment does not establish whether this site is Grade 3a (high quality) or 3b (not classed as high quality) and so further assessment would be required (SA Objective 9); and It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development at this site could incorporate the provision of new services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage in relation to these criteria. In conclusion, the site would make a positive contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Furthermore, six of the nine negative SA Objective scores are uncertain at this time. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site overlaps a watercourse along its north western edge and it is therefore uncertain what effect development might have on the watercourse in terms of water quality. These are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 9: soils, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42824737	Annex 1	<p>Site ID 59749. We set out below a response to the TMBC assessment of site 59749 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. TMBC has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 828 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). The site is within 800m of Mereworth primary school (SA Objective 3). There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore incorrect. The TMBC assessment also states that this site does not contain a water body, or water course, or falls within or partially within Source Protection Zone 1. The site's score should be at worst therefore 'Negligible' in relation to this objective. The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), a development of this size could be concentrated on land of lowest agricultural value; It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities and public transport. While the site currently falls in the 'Poor Accessibility Band', residential development of this scale would be expected to incorporate the provision of new community facilities, services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage. In conclusion, the site would make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Furthermore, 50% of the negative SA Objective scores are uncertain at this time and/or could be addressed through the scheme development. It would therefore be inappropriate to omit the site</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. These are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		from the Local Plan site selection process at such an early stage of plan preparation.	
42824737	Annex 1	<p>Site ID 59750. We set out below a response to the TMBC assessment of site 59750 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. TMBC has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 380 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). The site is located near to the village of Mereworth. There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment concludes that the site would result in a minor negative effect on SA Objective 2 (access to community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 400m of a bus stop (SA Objective 10), 800m of Mereworth Primary School (SA Objective 3) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of several key facilities that a residential development of this scale could benefit from. Therefore, the site's score should be at worst be 'Negligible' in relation to these objectives. Whilst the site is considered to be within an area of open space (SA Objective 1), this could be integrated into a residential scheme of this scale; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on four SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character), 7 (cultural heritage) and 9 (soil resources/ground contamination). However, as recognised in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objective 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects. These issues could therefore be overcome or addressed in the scheme development; It is noted that the TMBC assessment does not establish whether this site is Grade 3a (high quality) or 3b (not classed as high quality) and so further assessment would be required (SA Objective 9); This site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Given the uncertainty around the effects on these SA Objectives. However, it is recognised that there may be an opportunity for mineral extraction in advance of development; and The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the majority of the site as flood zone 1, with only the southernmost part within flood zone 3 (SA Objective 8). Development could therefore be directed to areas of low flood risk in northern parts of the site; The</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59750 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p> <p>With regard to SA objective 1: health and wellbeing, the site was recorded as containing an open space, even though it just overlaps it. In the next iteration of the SA Report, we will refine the GIS analysis so that where there is a slight overlap between a site and an open space, the site is not recorded as containing that open space. Subsequently, the site will receive a minor positive effect only in relation to this objective.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 9: soils, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis. The same applies in relation to Minerals Safeguarding Areas.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site contains a watercourse to its south and it is therefore uncertain what effect development might have on the watercourse in terms of water quality.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>TMBC assessment states that the site contains a water body, or water course, or falls within or partially within Source Protection Zone 1; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation to Objective 8. In conclusion, the site would make a positive contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Against the other objectives we note six of the seven negative SA Objective scores are considered to be 'uncertain' at this time or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59752 We set below a response to the TMBC assessment of site 59752 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that the site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 1,390 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. Furthermore, the site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore incorrect; The TMBC assessment also states that this site contains a water body, or water course, or falls within or partially within Source Protection Zone 1; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation to Objective 8; The TMBC assessment concludes that the site would result in a minor negative effect on SA Objective 2 (access to community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 400m of a bus stop (SA Objective 10), 800m of Mereworth Primary School (SA Objective 3) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of several key facilities that a residential development of this scale could benefit from. Therefore, the site's score should be at worst therefore 'Negligible' in relation to these objectives; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on two SA Objectives: 5 (biodiversity/geodiversity) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report,</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site contains a water body in its south western corner and it is therefore uncertain what effect development might have on the water body in terms of water quality. These are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59752 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>effects in relation to SA Objectives 5 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), a development of this size could be concentrated on land of lowest agricultural value; and The TMBC assessment concludes that development of the site would result in an 'uncertain minor negative' effect on SA Objective 6 (landscape and townscape character) as the site is on the edge of a settlement; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., the design, scale and layout of development, which may help mitigate any adverse effects). The site's score should be at worst therefore 'Negligible' in relation to Objective 6. In conclusion, this site has a clear advantage in being able to make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. The conclusions drawn in relation to SA Objective 8 are in our view incorrect. Against the other objectives we note four of the seven negative SA Objective scores are considered to be 'uncertain' at this time or it is recognised that a future scheme development could address the concerns raised. The site is adjacent to the southern edge of Kings Hill and so could form a sustainable urban extension to the existing settlement. Given the significant potential therefore of this site it would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59754 We set below a response to the TMBC assessment of site 59754 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 125 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it is noted that would be a negligible effect on SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. It is noted however that there are concerns with regards to the following: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5,</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59754 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; The site also contains a less than significant proportion (25%) of Grade 1, 2 or 3 agricultural land (SA Objective 9). Development could be concentrated on land of lowest value. Therefore, the site's score should be at worst therefore 'Negligible'; and It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development at this site could incorporate the provision of new services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage in relation to these criteria. In conclusion, the site would make a positive contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Against the other objectives we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59755 We set below a response to the TMBC assessment of site 59755 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 127 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (and does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it would have a negligible impact in relation to SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. It is noted however that there are concerns with regards to the following: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; The site also contains a less than significant proportion (25%) of Grade 1, 2 or 3 agricultural land (SA Objective 9). Development could be concentrated on land of lowest value. Therefore, the site's score should be at worst therefore 'Negligible'. It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development at this site could incorporate the provision of new services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage in relation to these criteria. In conclusion, the site would make a positive contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Against the other objectives we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59757 We set below a response to the TMBC assessment of site 59757 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored positively in relation to SA Objective 14 (i.e., the assessment concluded that a positive effect was likely in relation to housing supply). The site could provide circa. 59 dwellings which would make a positive contribution towards local housing supply over the local plan period. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (and does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it would have a negligible impact of SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. There are concerns with regards to several conclusions of the assessment: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		constraint; It is noted that the site scored negatively in relation to SA Objective 2 (accessibility to community facilities and services), SA Objective 3 (educational attainment) and SA Objective 10 (reduction of GHG emissions) due to its distance from community facilities, schools and public transport. While the site currently falls within the 'Poor Accessibility Band', residential development at this site could contribute to the wider provision of new services and transport infrastructure. On this basis, the site should not be omitted from the local plan preparation process at this stage in relation to these criteria. In conclusion, the site would make a positive contribution to local housing supply over the local plan period. Against the other objectives we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.	
42824737	Annex 1	<p>Site ID 59758 We set below a response to the TMBC assessment of site 59758 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 125 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore incorrect. The TMBC assessment also states that this site does not contain a water body, or water course, or falls within or partially within Source Protection Zone 1. Therefore, the site's score should be at worst therefore 'Negligible' in relation to this objective; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; The TMBC assessment concludes that the site would result in a minor negative effect on SA Objective 2 (access to</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives a significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. These are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation.</p> <p>Site 59758 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 400m of a bus stop (SA Objective 10) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from. Therefore, the site's score should be at worst be 'Negligible'. In conclusion, the site would make a positive contribution to local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures. Against the other objectives we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.	
42824737	Annex 1	<p>Site ID 59759 We set below a response to the TMBC assessment of site 59759 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed the site against 14 Sustainability Appraisal (SA) Objectives. We note that the site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 330 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (and does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it would have a negligible effect on SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. It is noted however that there are concerns with regards to the following: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on two SA Objectives: 5 (biodiversity/geodiversity) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development could be concentrated on land of lowest agricultural value; The TMBC assessment concludes that the site would result in a significant negative effect on SA Objective 2 (access to community facilities/services). While the site is in the Poor Accessibility Band, it is within 400m of a bus stop (SA Objective 10) and within 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from and it would be</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 7: heritage and 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59759 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>expected to make a contribution to the provision of services or potentially provide on-site. Therefore, the site's score should be at worst be 'Negligible'. The TMBC assessment concludes that development of the site would result in an 'uncertain minor negative' effect on SA Objective 6 (landscape and townscape character) as the site is on the edge of a settlement; however, TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., the design, scale and layout of development, which may help mitigate any adverse effects). The site's score should be at worst therefore 'Negligible'. In conclusion, the site would make a positive contribution to local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures. Against the other objectives we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59760 We set below a response to the TMBC assessment of site 59760 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 221 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (and does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it would have a negligible effect on SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. It is noted however that there are concerns with regards to the following: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development could be concentrated on land of lowest agricultural value; and The TMBC assessment concludes that the site would result in a significant negative effect on SA Objective 2 (access to community facilities/services). While the site is in the Poor Accessibility Band, it is within 400m of a bus stop (SA Objective 10) and</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59750 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		within 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from, and it would also be expected to make a contribution to these services potentially on-site. Therefore, the site's score should be at worst be 'Negligible'. In conclusion, the site would contribute positively to local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures. Against the other objectives we note five of seven negative effects are 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.	
42824737	Annex 1	<p>Site ID 59761 We set below a response to the TMBC assessment of site 59761 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored positively in relation to SA Objective 14 (i.e., the assessment concluded that a positive effect was likely in relation to housing supply). The site could provide circa. 86 dwellings which would make a positive contribution towards local housing supply over the local plan period. The site is not within 100m of an AQMA and is entirely within Flood Zone 1 (and does not contain a water body, watercourse, or fall within a source protection zone). Therefore, it would have a negligible impact of SA Objective 12 (air quality) and SA Objective 8 (water features/resources) respectively. There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on SA Objective 6 (landscape and townscape character) as the site is not located near an existing settlement. However, we understand that the site is adjacent to the southwestern edge of Kings Hill. The site's score should be at worst therefore 'Negligible'; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; The TMBC assessment concludes that development of the site would result in a minor negative effect on SA Objective 9 (soil resources/contamination). The site contains a less than significant proportion (25%) of Grade 1, 2 or 3 agricultural land; therefore, the site's score should be at worst 'Negligible'; and The TMBC assessment concludes that the site would result in a minor negative effect on SA</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all site options are appraised on a consistent basis.</p> <p>Site 59761 is recorded as having an uncertain significant negative effect in relation to SA objective 6: landscape because it contains an open space (Kate Reed Wood) that could potentially be lost as a result of development, although this is uncertain.</p> <p>Site 59761 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		Objective 2 (access to community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 400m of a bus stop (SA Objective 10), 800m of Kings Hill school (SA Objective 3) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of several key facilities that a residential development of this scale could benefit from. Any development on site would also be expected to contribute to existing and new services. Therefore, the site's score should be at worst therefore 'Negligible'. In conclusion, the site would make a positive contribution to local housing supply over the local plan period, against the other objectives we note of four of six negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a216oesn're scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.	
42824737	Annex 1	<p>Site ID 59797 We set below a response to the TMBC assessment of site 59797 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. The site currently operates as a golf course. We note that this site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 1,228 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. Furthermore, the site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). The site includes areas of green space that could be incorporated into a residential scheme of this size. There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on SA Objective 6 (landscape and townscape character) as the site is not located near an existing settlement. However, the site is adjacent to the southern edge of Kings Hill. The site's score should be at worst therefore 'Negligible'. The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; The TMBC assessment in relation to Objective 8 states that 25% of the site is at high risk from flooding (Flood Zone 3, 1 in 30 year risk of surface water flooding). However, we understand that the Environment Agency's mapping system identifies the entire</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage and 9: soils, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59797 is recorded as having an uncertain significant negative effect in relation to SA objective 6: landscape because it contains an open space (Kings Hill Golf Course) that could potentially be lost as a result of development, although this is uncertain.</p> <p>With regard to SA objective 8: water, the site receives a significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>Site 59797 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>site as Flood Zone 1. The conclusions drawn against SA Objective 8 are therefore incorrect. The TMBC assessment also states that this site does not contain a water body, or water course, or fall within or partially within Source Protection Zone. The site's score should be at worst therefore 'Negligible' in relation to this objective; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development could be concentrated on land of lowest agricultural value; The TMBC assessment concludes that the site would result in a minor negative effect on SA Objective 2 (access to community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 400m of a bus stop (SA Objective 10), 800m of Kings Hill school (SA Objective 3) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of several key facilities that a residential development of could benefit from. Therefore, the site's score should be at worst 'Negligible'. Furthermore, residential development of this scale would be expected to incorporate the provision of new community facilities, services and transport infrastructure or contribute to off-site existing/proposed facilities. On this basis, the site should not be omitted from the local plan preparation process at this stage. In conclusion, this site has a clear advantage in being able to make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. The conclusions drawn in relation to SA Objective 8 are in our view incorrect. Against the other objectives we note four of seven negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. The site is in close proximity to existing services and public transport facilities. Therefore, given the significant potential of this site, it would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59799 We set below a response to the TMBC assessment of site 59799 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). There are concerns with regards to several conclusions of the TMBC assessment as follows: The TMBC assessment concludes that development of the site has a potential residential yield of less than 100. However, it is important to make provision for a wide range of larger and smaller sites and therefore the ability to deliver less than 100 dwellings should not rule this site out; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59799 is still expected to have a positive effect in relation to SA objective 14: housing, albeit minor. In order to distinguish between large and small sites, a significant positive effect is given to sites providing 100 dwellings or more. A minor positive effect is given to sites providing fewer than 100 dwellings.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development could be concentrated on land of lowest agricultural value; and The TMBC assessment concludes that the site would result in a significant negative effect on SA Objective 2 (access to community facilities/services). While the site is in the Poor Accessibility Band, it is within 400m of a bus stop (SA Objective 10) and within 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from, and any development would be expected to contribute to off-site facilities. Therefore, the site's score should be at worst be 'Negligible'. In conclusion, the site has the potential to contribute positively to housing supply over the local plan period as part of a mix of larger and smaller sites. Against the other SA objectives, we note five of eight negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.	Site 59799 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.
42824737	Annex 1	Site ID 59800 We set below a response to the TMBC assessment of site 59800 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 275 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality).It is noted however that there are concerns with regards to the following: While the site falls entirely within Flood Zone 1, it contains a water body, or water course, or falls within or partially within Source Protection Zone 1 (likely at the eastern edge of the site). TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e.218oesn't218y218yn of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation to SA Objective 8 (water features/resources); The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the site contains a water body in its east and it is therefore uncertain what effect development might have on the water body in terms of water quality. These are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59800 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9) and areas of open space (SA Objective 1), the development would be concentrated on land of lowest value and could incorporate areas of open space within the development; and The TMBC assessment concludes that the site would result in a significant negative effect on SA Objective 2 (access to community facilities/services). While the site is in the Poor Accessibility Band, it is within 400m of a bus stop (SA Objective 10), 800m of primary or secondary school (SA Objective 3) and 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from, and any development would be expected to make a contribution to off-site facilities or potentially make on-site provision. Therefore, the site's score should be at worst be 'Negligible'. In conclusion, the site would contribute positively to local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures. Against the other objectives we note five of seven negative SA Objective scores are 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42824737	Annex 1	<p>Site ID 59802 We set below a response to the TMBC assessment of site 59802 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored very strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 644 dwellings, it would make a significant contribution towards local housing supply over the local plan period and could offer a wider mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). There are concerns with regards to several conclusions of the TMBC assessment as follows: While the site falls entirely within Flood Zone 1, it contains a water body, or water course, or falls within or partially within Source Protection Zone 1. TMBC recognises that the effects are uncertain because they would be dependent on the final development (i.e., incorporation of SUDs, location of development within the site). The site's score should be at worst therefore 'Negligible' in relation to SA Objective 8 (water features/resources); The TMBC assessment concludes that the site would result in a significant negative effect on SA Objective 2 (access to community facilities/services). While the site is in the Poor Accessibility Band, it is within 400m of a bus stop (SA Objective 10), 800m of primary or secondary school (SA Objective 3) and 800m of a type of healthcare</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives a mixed uncertain significant negative and negligible effect. The uncertain significant negative effect is as a result of the site containing a couple of water bodies in its north eastern corner. It is uncertain what effect development might have on the water body in terms of water quality. Further to this, the site falls within Source Protection Zone 3. The negligible effect acknowledges the fact that the entire site is located within Flood Zone 1.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facility or outdoor space (SA Objective 1). The site is within 1km of key facilities and public transport that a residential development of this scale could benefit from and any development would be expected to make a contribution to off-site facilities or potentially make on-site provision. Therefore, the site's score should be at worst be 'Negligible'; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; and While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development would be concentrated on land of lowest value. In conclusion, the site would make a significant contribution to local housing supply over the local plan period, offering a mix of housing sizes, types and tenures. Furthermore, four of six negative SA Objective scores are uncertain at this time, and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	<p>Site 59802 is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. This information has fed into the SA.</p>
42824737	Annex 1	<p>Site ID 59803 We set below a response to the TMBC assessment of site 59803 in Appendix D, Annex 1 of TMBC's Interim Sustainability Appraisal. The Council has assessed this site against 14 Sustainability Appraisal (SA) Objectives. We note that this site scored strongly in relation to SA Objective 14 (i.e., the assessment concluded that a significant positive effect was likely in relation to housing supply). Given the site could provide circa. 331 dwellings, it would make a positive contribution towards local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures, including affordable housing. The site is not within 100m of an AQMA so would have a negligible effect on SA Objective 12 (air quality). It is noted however that there are concerns with regards to the following: The site falls entirely within flood zone 1, does not contain a water body or watercourse, but falls within a within or partially within Source Protection Zones 2 and 3 (SA Objective 8). On this basis a Negligible/Uncertain impact is predicted; The TMBC assessment concludes that the site would result in a minor negative effect on SA Objective 2 (access to community facilities/services). However, the site is in the 'Fair Accessibility Band' because it is within 800m of a railway station (SA Objective 10), 800m of an existing secondary school or a primary school) and within 800m of a type of healthcare facility or outdoor space (SA Objective 1). The site is adjacent to the northern boundary of Watlingtonbury and could form a considerable urban</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives a mixed uncertain significant negative and negligible effect. The uncertain significant negative effect is as a result of the site falling within Source Protection Zone 3. It is uncertain what effect development might have on the water quality. The negligible effect acknowledges the fact that the entire site is located within Flood Zone 1.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soils and 13: material assets and waste, it is correct that some of the adverse effects are uncertain, as they may be overcome through mitigation. However, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>Site 59803 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This information has fed into the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>extension which could benefit from existing key facilities (within 1km). Any development would also potentially make on-site provision given the potential scale of development; The site includes areas of green space that could be incorporated into a residential scheme of this size. Therefore, the site's score should be at worst 'Negligible'; The TMBC assessment concludes that development of the site would result in an 'uncertain significant negative' effect on three SA Objectives: 5 (biodiversity/geodiversity), 6 (landscape and townscape character) and 7 (cultural heritage). However, as stated in Chapter 5 of the Interim Sustainability Report, effects in relation to SA Objectives 5, 6 and 7 are uncertain because this would largely be dependent on the design, scale and layout of forthcoming development at the site. Furthermore, additional measures could be incorporated within a new development to mitigate against harmful effects; The site is also within a Mineral Safeguarding Area (SA Objective 13), but effects are 'uncertain minor negative' at this stage. Again, the TMBC assessment recognises the potential for prior mineral extraction which would address this constraint; and While the site contains a significant proportion (25%) of Grade 1 and/or Grade 2 agricultural land (SA Objective 9), the development could be concentrated on land of lowest agricultural value; In conclusion, the site would contribute positively to local housing supply over the local plan period and could offer a mix of housing sizes, types and tenures. Against the other objectives we note four of six negative SA Objective scores are considered to be 'uncertain' at this time and/or it is recognised that a future scheme development could address the concerns raised. It would therefore be inappropriate to omit the site from the Local Plan site selection process at such an early stage of plan preparation.</p>	
42069697	Annex 1	<p>Site Identification Number: 59709 (Land at Dark Hill Farm, Borough Green) Berkeley has some concerns with the ISAR scorings given to this site as explained below. SA Objective 2: The outcome of objective 2 is accepted. Berkeley strongly believes that access to community facilities and services will be improved post development of the site. Two primary schools are located less than 1km from the site, in addition to a secondary school being located approximately 1.8km from the land at Dark Hill Farm. SA Objective 5: Berkeley would ask the council to reconsider the assessment of objective 5 (to protect and enhance biodiversity and geodiversity) as uncertain significant negative. The site's definition as a green infrastructure asset is questionable given the limited public access to it. While Berkeley appreciates the site lies within close proximity to a Local Wildlife Site, it is not within 250m of one or more internationally or nationally designated sites. Development will be unlikely to cause disruption to the Local Wildlife Site. Berkeley endeavours to achieve 10% net-biodiversity gain on all projects and the land at Dark Hill Farm is no exception. There is an opportunity as part of the development to retain, enhance and create areas of green space on site and will do so with the upmost respect for the current landscape setting. It is incorrect to assume that development will worsen the surrounding natural environment and not enhance it. SA Objective 6: Berkeley disagrees with regard to scoring the site with an uncertain significant</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of Bourne Valley Woods Local Wildlife Site and Ancient Woodland, and contains green infrastructure assets (thick vegetation).</p> <p>Although development of this site offers the opportunity to achieve biodiversity net gain, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is located within the North Downs AONB.</p> <p>With regard to SA objective 7: heritage, the site is recorded as containing Neolithic finds, in addition to falling within 250m of a number of heritage assts. Therefore, it receives a significant negative</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>negative for objective 6 – to protect and enhance the borough’s landscape and townscape character and quality. Greater certainty about the impacts of development on the landscape is provided by landscape assessment work undertake by Murdoch Wickham Associates for Berkeley. The analysis explains that the land comprises paddocks with areas of scrub and derelict farm buildings. The characteristics of the site are not typical of the wooded, traditional farmed landscape associated with the Greensand Ridge within the Kent Downs AONB. Residential development on the western fringes of Borough Green is visible in views to the site and other urbanising influences including traffic noise associated mainly with the A25 and the nearby residential development in the former quarry site to the south west further detract from the site’s contribution to the AONB. Overall, the site has a relatively high degree of visual enclosure, in particular the fields north of the footpath, which runs across the centre of the site. The northern hedge provides an effective screen between the site and the A25. There are potential views to the land from the west in the vicinity of Oldbury Hill, but this is a densely wooded area, and no viewpoints were identified. The site does not share the dominant characteristics of the Kent Downs AONB. The site serves a much lower function in comparison to the wider area and the land contributes little to the AONB designation. It is concluded that the development of the Dark Hill Farm site would have a negligible impact on the AONB.SA Objective 7: the scoring the site with an uncertain significant negative for objective 7 due to the site’s proximity (being within 250m) to a heritage asset requires further analysis. The site does not contain any designated or non-designated heritage assets. Furthermore, there are no listed buildings directly adjacent to the site. The Borough Green conservation area is located on the eastern side of the town and as such would not be impacted. The site is located approximately 135m from the closest heritage asset in Borough Green, with further Grade II listed buildings, found an additional 20m eastward and still within the urban confines of Borough Green. Ightham Court, a Grade II* listed building (Registered Park and Gardens designation) is located approximately 750m from the site north-westward. There is limited or no intervisibility between the site and the nearby heritage assets. The land at Dark Hill Farm will have a negligible impact on any of the surrounding heritage assets and it is incorrect to score the site with an uncertain significant negative, purely based on proximity.SA Objective 8-- The SA assesses the site, in line with objective 8 criteria, to have a ‘significant negative’ impact on enhancing the quality of water features and resources. The assessment states the site to be either entirely or significantly (i.e. 25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding. While a proportion of the western boundary is part of Flood Zone 3, it is not in excess of 25% of the site. In fact, much less than 25% of the site resides in Flood Zone 3 as this only affects a small area on the western site boundary. Surface water flooding is also determined to affect more than 25% of the site, alongside the land being associated with a 1 in 30-year risk of surface water flooding. It is evident that only a small proportion of the</p>	<p>effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertain significant negative effect is as a result of the site containing land with a 1 in 30 year risk of surface water flooding. Further to this, there is some overlap with a watercourse in the north west of the site and therefore it is uncertain what effect development might have on the watercourse in terms of water quality. Although the respondent has said that flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures such as SuDS, this is a 'policy-off' appraisal that does not take into consideration mitigation. Each reasonable alternative development site option has been appraised on a 'policy-off' basis, which means that it has been appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via a policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>northern parcel is prone to surface water flooding. Surface water flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures (SuDS) within the design proposal. Overall, whilst there is some flood risk on site, which is accepted, this has the potential to be avoided or suitably mitigated. This means that the impact would be negligible.SA Objective 9-- The SA assessment of objective 9 ranks the site as an uncertain significant negative. An agricultural land classification survey will need to be undertaken to determine whether the Option Land is Grade 3a (best and most versatile) or Grade 3b (not best and most versatile). However, either way this should not prejudice the assessment of suitability, as the site is not currently in productive agricultural use and realistically is not of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed.</p>	
24927329	Annex 1	<p>"[59826, 59847, 59819, 59832, 59784, 59820, 59791, 59792, 59790] - SA TABLES SAVED UNDER REF</p> <p>R1630 _221103_Martin Friend (Vincent and Gorbing) Trenport Investments Limited</p> <p>Comments have already been made above regarding the assessment of the strategic options in the Sustainability Appraisal. Some of our general concerns with the SA are also reflected in our comments on the SA of individual sites. We accept that this is an interim document and, moreover, it presents a very 'high level' analysis; there is no weighting between the different SA objectives and the number of "?" notations indicates that there is a considerable degree of uncertainty in much of the assessment.</p> <p>60. In respect of the site assessments, we note that these are also 'high level' and do not take account of any mitigation that the sites assessed can provide, whether this is environmental (BNG or landscape enhancement for example) or in the provision of on-site community infrastructure or transport improvements. This is particularly so for the Trenport's sites at Eccles (formerly Bushey Wood.</p> <p>61. Trenport's comments on the SA site assessments are attached as Annex 1 to this statement."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The strategic policy options have been appraised on the basis that they would have a wide range of effects across the SA objectives. However, it is recognised that there is considerable uncertainty depending on the eventual location of housing development. As such, a number of the effects are recorded as uncertain.</p> <p>Quantum Option 2 receives more negative effects than Quantum Option 1 because as explained in the report, delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities, services and facilities, and schools. However, the Interim SA Report also acknowledges that the extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities. Both Quantum Options are expected to have a significant positive effect in relation to SA objective 14: housing. The significant positive effect for Quantum Option 2 is recorded as uncertain, as the level of housing delivery would be in excess of what the local housing markets have supported over the past decade and so there is a question mark around its deliverability.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The respondent is correct to note that the site appraisals contained within Annex 1 of the Interim SA Report have been undertaken on a 'policy-off' basis, which means that consideration has not been given to mitigation (e.g. provision of new services and facilities, Biodiversity Net Gain, landscaping, surface water management and contributions to bus services). Instead, the appraisals are based on the physical</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>constraints of each site only, so as to ensure all sites are appraised in a consistent manner.</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Sites 59826, 59791 and 59792 receive uncertain significant negative effects (as part of mixed effects) in relation to SA objective 1: health and wellbeing, as they contain open space that could be lost as a result of development, although this is uncertain. As mentioned already, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated at a later stage in the plan-making process and policy wording provided, mitigation will be taken into account through 'policy-on' appraisals of the sites.</p> <p>Sites 59832 and 59784 are incorrectly recorded as containing an open space. The reason these sites are recorded as containing open space is that they slightly overlaps an open space and so the GIS analysis identified the sites as containing open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the sites will receive significant positive effects only in relation to SA objective 1.</p> <p>Although site 59790 comprises brownfield land, actual construction of the site if it were to be allocated could have an adverse effect on biodiversity and geodiversity, due to its proximity to these assets. Therefore, the uncertain significant negative effect this site is expected to have in relation to SA objective 5: biodiversity and geodiversity is appropriate and in line with the site assessment criteria.</p> <p>The SA has correctly sought to identify all reasonable alternative development site options that contain green infrastructure assets and this is reflected in the appraisal of these sites. Although, sites 59819, 59832 and 59784 are incorrectly recorded as containing green infrastructure assets as they slightly overlap at least one green infrastructure asset. In the next iteration of the SA, the proformas for these sites will be updated to reflect the fact they do not contain green infrastructure assets.</p> <p>With regard to SA objective 7: heritage, site 59790 is in fact within close proximity to numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, site 59826 is correctly recorded as having an uncertain significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding, in addition to some water bodies.</p> <p>With regard to SA objective 14: housing, sites appraised for mixed use receive some uncertainty, as it is unknown how much of the site will</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			be used for residential development as opposed to other uses. Further to this, we have responded to the estimated yield provided by TMBC, which was generated using a methodology agreed by the Council and applied to all sites.
42781249	Annex 1	<p>"Site 59488 High Street car park</p> <p>Residential</p> <p>High Street car park 16 houses</p> <p>my comments on the use of this site for house building are</p> <p>to maintain the economic viability of the town West Malling needs to retain all existing car park spaces. It has two little as it is with many people parking on double yellow lines. This will lead to indiscriminate parking on residential roads already overburdened. Loss of parking will be disastrous for the shops specially Tesco. Many older people live in the town centre and these shops and services are their lifeline. visitors will go elsewhere</p> <p>Ryarsh lane car park</p> <p>site 59447</p> <p>residential</p> <p>Ryarsh Lane car park 14 houses</p> <p>my comments on the use of this car park for housing are this car park provides the only dedicated parking for town business and retail premises. West Malling needs more parking space not less. Car parking is vital for the economic viability of the town. It has a number of restaurants and pubs which attract visitors and residents at all hours of the day. With little car parking pay spaces people are increasingly parking on double yellow lines and blocking roads. There is a long list of permits with many residents without car garage space. There is no alternative town centre site.</p> <p>St Leonard St site 59594 residential St. Leonards street 35 houses my comments on the use of this site for house building are:</p>	<p>The respondent's comment on car parking spaces relates more specifically to the Local Plan than it does the SA.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA acknowledges that site 59594 is within close proximity of heritage assets and so the site receives an uncertain significant negative effect in relation to SA objective 7: heritage. Site 59592 is recorded as comprising brownfield land and so received a significant positive effect in relation to SA objective 9: soil. The SA is high-level and so does not give consideration to site-specific access points.</p> <p>The SA records site 59602 as greenfield land that contains a significant proportion of Grade 1 and/or 2 agricultural land, and site 59603 as comprising brownfield land. The SA is too high-level to consider traffic congestion and busy road junctions, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. With regard to sites 59619, 59620, 59621 and 59622, consideration is given in the SA to the Agricultural Land Classification under SA objective 9: soil. All four sites receive a significant negative effect in relation to SA objective 9, as they contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>Site 59645 receives an uncertain significant negative effect in relation to SA objective 9: soil, as it is greenfield and contains a significant proportion of Grade 3 agricultural land. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). It is also receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is located within 250m of a heritage asset. The effect is recorded as uncertain as the actual effect will depend on factors such as the design of development and whether there are sight lines between the development site and nearby heritage assets.</p> <p>The SA also acknowledges that sites 59716, 59714, 59807, 59860, 59814, 59740 and 59854 are within close proximity of heritage assets, with the sites each receiving an uncertain significant negative effect in relation to SA objective 7: heritage, as they are located within 250m of a heritage asset. Sites 59716, 59699 and 59854 receive a significant negative effect against SA objective 9: soil, as they are greenfield and</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>It's imperative to retain this green belt land and also it is partly within the conservation area. It will also lead to loss of agricultural land. It will be detrimental to the historical setting of St. Leonards tower and morning place. Access to the site to both St. Leonards street and Teston Road will be problematical as it is a busy area with teston road being especially in our land. The present access to part of the site is a narrow angled road onto St. Leonards street which is potentially dangerous and not in anyway suited to an increase in traffic.</p> <p>St. Leonards St the Crest site 59602 59603 mixed-use the Crest opposite Orwell spike mix use includes 19 houses</p> <p>my comments on the use of this site for house building are:</p> <p>I object to developing this green belt land and the loss of agricultural land. It will also increase the traffic in this area already more so because of the development opposite. It is near to a busy roundabout of which heavy lorries come and go to blaise farm quarry.</p> <p>Norman Road site 59619 residential Norman road 30 houses this site totally includes 59620 59621 and 59622</p> <p>My comments on the use of this site for house building are:</p> <p>This is green belt land and it has repeatedly been refused on appeal. It involves lots of agricultural land. There is a height restriction between Sandy Lane railway bridge. Fatherwell Rd has quite lane status and traffic is restricted on West Street. Norman road is very narrow at that point with focus and car sharing one lane.</p> <p>Site 59620 residential Norman road seven houses my comments on the use of this side for house building are the same as the above for Norman Road</p> <p>site 59621 59622 residential Norman road 20 house, 7 houses</p> <p>my comments for the use of this site for house building are the same as the above for Norman Road.</p> <p>Offham Road site 59645 residential Offham adjacent to number 139 42 houses</p>	<p>contain a significant proportion of Grade 1 and/or 2 agricultural land. Site 59714 receives an uncertain significant negative effect against SA objective 9, as it is greenfield and contains a significant proportion of Grade 3a or 3b agricultural land.</p> <p>Sites 59699 and 59740 already receive significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. The SA also acknowledges the presence of water bodies within site 59740.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Previously refused by tmhc.</p> <p>My comments on the east of this site for house building are:</p> <p>This is protected green belt land it would also involve loss of agricultural land. It would cause harm to the setting and views in the conservation area. It would also cause harm to the setting of the locally historical duces manner and St Mary's Church. Traffic is restricted in the often road leading onto narrow West Street.</p> <p>Often Road</p> <p>site 59716 residential</p> <p>Offhamoften road to Mallings place grounds 28 houses</p> <p>My comments on the use of this site for house building are:</p> <p>These sites are on protected green belt land and is in a conservation area. They should be granted permission we will lose precious agricultural land. It would cause harm to setting up St. Leonards tower an morning place. Access to the sites would present major traffic problems on to the narrowing road into the heart of West morning. Parking is already allowed on both sides of the road nearer to West St resulting in a single lane.</p> <p>Offham road Manor Farm</p> <p>site 59714 residential Manor Farm Offham Road 69 houses</p> <p>My comments on the use of this site for house building are: this is green belt land and this development would detract from visual amenity of the rural landscape. This is rural land in the conservation area. This would harm the setting and views of deuces manner in Saint Mary's church like a historical buildings. We would also suffer the loss of agricultural land to this beautiful rural landscape. Traffic would be on to the restricted often road and into last West Street and the restricted access to the High Street at the very narrow junction.</p> <p>London Road 59658 59670 residential</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>London Road 19 houses 17 houses</p> <p>My comments on this of this site for house building are: this is a green belt site and should be protected. As there is already an improved application for a 79 bed care home I believe it would be an overdevelopment of this green belt side.</p> <p>Ofham/Ewell 59699</p> <p>site 59699 mixed-use Ewell Ave/Offham road mixed-use</p> <p>My comments on the use of this site for mixed-use housing and other uses are this is farmland in the green belt granting of planning permission would result in the loss of the best and most versatile agricultural land. The traffic from this developed site with significant impact on the town as it would lead directly to join the often restricted off and West Street. Access might also be on to other smaller roads in the area IE father well road which will be dangerous as they are single lane and narrow. Drainage in this area I terrible with flooding frequently after rainfall.</p> <p>Station approach 59807 site 59807 residential station approach 34 houses</p> <p>My comments on the use of this site for housing are:</p> <p>an appeal full this site was refused in 22 (gladman). Nothing has changed to make this site this make this a viable site. It was deemed detrimental to the setting of historical West Malling Abbey Eden from oast houses and West Malling station. It is also valuable agricultural land.</p> <p>Station approach Eden farm 59860 sites 59860 residential</p> <p>station road/ Eden farm lane 41 houses</p> <p>My comments on the use of this land for house building are:</p> <p>This would cause harm to the setting of Westmoreland Abbey a scheduled ancient monument. It would also cause harm to the setting of the conservation area and cause loss of valuable agricultural land. Access in and out of the site would also be on station approach which</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>is one end joins Lucks Hill with the primary school directly opposite. It would cause traffic chaos leading directly to swan street and the High Street all on narrow roads.</p> <p>Bypass 59814 site 59814 59740 triangular failed off West Malling bypass my comments on the use of this land for housing or other uses. This site is very close to station approach access an early application which was rejected 59807. It is also detrimental to the setting of historical West Malling Abbey and station. It would entail a loss of agricultural land.</p> <p>Broadwater farm 59740 site mix used Broadwater farm mix useful stop site of current planning application with area West of bypass removed. my comments on the use of this land for 900 houses are: land at significant harm for loss of conservation areas of new barns Broadwater farm and Mill Street. There would be harm to the aquifer for streams into word east Malling. It would cause harm to non listed heritage assets quiet lane and the road network. There would be need for two access roads through the countryside and it would entail significant loss of agricultural land.</p> <p>Lux hill/station north 59854 residential Lucks Hill station North 20 houses</p> <p>My comments on the use of this land for house building are:</p> <p>This is opposite a rejected development. It was approved by tmbc for a car park which has now lapsed. And appeal is awaited up for on the refusal by tmbc for a care home. This development would cause harm to the setting of West Malling Abbey it is in the a conservation area and would entail loss of agricultural land. Lucks Hill narrows at this point and with a primary school opposite would cause major traffic disruption in the area and leading directly onto swan street and the nearby designated quiet lane."</p>	
43485921	Annex 1	[SITE REF: 59740 - BROADWATER FARM] - [SEE 'COPIES FOR LUC' FOLDER]	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>This is a 'policy-off' appraisal and so the site is appraised on its physical merits only. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>In the SA, all reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. The respondent has provided their own SA of this site. However, their appraisal is not in line with the site assessment criteria.</p> <p>It is important to note that the SA is one of many factors that feed into the plan-making process.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1. This is because in accordance with the site assessment criteria, it is within 800m of open space and walking paths. Therefore if the site were to be developed, residents would have access to open space and walking paths. With regard to the respondent's point on uncertainty, if a site is recorded as containing a designated open space it receives some uncertainty, as it is unknown whether the open space will be lost or not, or integrated into development. With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites. However, if a site is allocated in the Local Plan via policy containing mitigation measures then it will be appraised on a 'policy-on' basis against the sub-objectives.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

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			<p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59740 is 5ha or more, it receives a significant positive effect in relation to this objective. The fact it is also within 800m of a train station also contributes to this significant positive effect.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlement of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. The SA is too high-level to give consideration to individual planning applications for sites, as this would result in not all sites being appraised on a consistent basis. The historic environment, including Conservation Areas, is considered separately under SA objective 7: heritage.</p> <p>The SA acknowledges the heritage assets within 250m of the site (including within the site). For this reason, the site receives a significant negative effect in relation to SA objective 7: heritage. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>The SA acknowledges the fact the site is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land. For this reason, the site receives a significant negative effect in relation to SA objective 9: soil.</p>

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			<p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour. The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, the minor negative effect is recorded as uncertain as although the site is within a Minerals Safeguarding Area, the actual effect will depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>The respondent has not provided a reason as to why they consider the uncertain minor positive effect against SA objective 14: housing unreasonable. Site 59740 is proposed for a mix of uses but it is unknown what percentage of the site will be provided for housing, hence the uncertainty.</p>
45357665	Annex 1	<p>"[59779]</p> <p>Site in Green Belt, proposed 38 houses, traffic, opposite primary school, with direct access to fast A227 main road.</p> <p>[59827]</p> <p>Site in Green Belt, proposed 82 house, traffic on narrow country lanes with no village shop, GP surgery or bus service.</p> <p>[59825]</p> <p>Site in Green Belt, backing on to cottage gardens and contributing to danger on country lanes with no speed limit. "</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is too high-level to consider traffic congestion and road width, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA gives consideration to the proximity of sites to services and facilities, including GP surgeries as set out under SA objective 1: health and wellbeing. The Urban Capacity Study (July 2022) was used to inform appraisals under SA objective 2: services and facilities, giving consideration to access to amenities.</p>
42726913	Annex 1	"I'm in the process of completing a response to the Regulation 18 Local Plan but I am confused after reading the Site Assessment Criterias and Objectives in the Interim Sustainability Appraisal Report.	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>All reasonable alternative development site options are appraised against the site assessment criteria contained in Appendix D of the Interim SA Report. With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA</p>

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		<p>It seems to me that the basis for the objectives are specific and factual. As such it is not possible to take issue with them. To take an example, Objective 1 (page 250) provides examples relating just to that Objective, for "Significant Positive", "Minor Positive" and Minor Negative" findings. Each of the assessments which provide one or other of these responses, is a fact which cannot be challenged. Is the Site within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility? If yes, the site would seem to automatically get a "Significant Positive (++) notwithstanding that the existing healthcare facility may be at full capacity. Is this an issue which would be dealt with at planning stage?</p> <p>Likewise, the accessibility assessment fails to take any account of the additional use of vehicles and the added congestion which will occur, for example, along the A26, through Hadlow and into Tonbridge and the fact that the country lanes will undoubtedly take substantially more vehicles when people find it quicker to use them rather than sit in a queue.</p> <p>I would have thought that these issues need to be considered now at a time when sites for development are being identified. I am unable to find any reference as to how these issues effect the Objectives and I don't wish to burden your Planning Department with comments and loads of paper that is not required.</p> <p>Can you clarify, please, what you wish me to comment upon? Does it go to such things as potential pollution, traffic flow and preservation of wildlife outside nationally recognised areas?"</p>	<p>objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>The SA is too high-level to consider impacts on the road network and traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p>
43487265	Annex 1	<p>"[59592]</p> <p>Further to the additional call for sites announced recently, and the assessment of the above site, we set out below some further comments to assist on your review.</p> <p>Objective 3 – we can confirm that any future planning proposals would properly address any contributions required.</p>	<p>These are 'policy-off' appraisals that do not take into consideration mitigation (e.g. financial contributions), rather they are based on the physical constraints of each site. This ensures all sites are appraised in a consistent manner. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59592 has been appraised in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p>

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		<p>Objective 5 and 8 – there is a dilapidated pond on site which is dry much of the year and self seeded trees.</p> <p>The promoter of the site would be willing as part of a development scheme to enhance these in order to demonstrate some bio-diversity net gain.</p> <p>Objective 9 – notwithstanding the Grade, the site is too small to be of any viable agricultural use and so its loss would have no effect.</p> <p>Objective 14 – it is important to note that NPPF does encourage small sites as these can be delivered fairly quickly and so provide a social benefit because of this."</p>	
43635649	Annex 1	<p>"[59740]</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Given that local residents will be subject to additional light, air, noise and water pollution from any new development adjacent to their currently rural properties, it is unlikely that this will improve their quality of life.</p> <p>The whole of the Broadwater Farm area with its bridleways and footpaths provides a green outdoor space for local residents and visitors alike - a valuable local amenity, much used by dog walkers, horse riders, people taking their exercise, and as a route for walking or cycling across countryside between communities.</p> <p>Science increasingly is providing evidence that nature and outdoor spaces impact positively on mental and physical well-being. The Lockdowns have brought this need very much into focus, with a growing change seen in public attitudes to the natural world.</p> <p>It is significant and encouraging that recognising the pressing need, some local authorities already have been finding imaginative ways to purchase tracts of land where conservation landscapes are under threat from being overwhelmed by development.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p>	<p>Site 59740 has been appraised in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 1: health and wellbeing looks at the proximity of sites to healthcare facilities and open space, in addition to walking and cycling paths, play areas and sports facilities. It would not be possible at this early stage in the plan-making process to explore the effects of light and noise pollution on existing homes. Consideration has been given to air pollution under SA objective 12: air pollution, which looks at the proximity of sites to Air Quality Management Areas (AQMA), as if they are within close proximity of an AQMA they could exacerbate existing air quality issues. Consideration has also been given to water quality under SA objective 8: water, which acknowledges whether a site contains a water body or watercourse, or falls within a Source Protection Zone, and so its development could have an adverse effect on water quality. The SA acknowledges in the proforma for site 59740 that it contains a water body and therefore could be vulnerable to pollution as a result of development.</p> <p>SA objective 2: services and facilities related to accessibility to amenities, rather than the capacity of existing services and facilities, car parking and public transport. Access to schools is dealt with separately under SA objective 3: education. The SA is too high-level to consider access to car parking.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Site 59740 is already recorded a receiving a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative</p>

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		<p>Existing community facilities and services are already under pressure, leading to inadequately staffed health facilities, over-subscribed schools and cut-backs in public transport – all of which suffer from spiralling costs.</p> <p>It is hard to envisage how a large new development can hope to improve this, and unless huge resources are committed to building and running new facilities, both existing and new communities will be insufficiently provided for.</p> <p>Given that new developments tend to attract new people to the area, it is debatable how this benefits local people.</p> <p>Parking in West Malling is already a nightmare – new people wanting to visit established local shops and hostelrys may delight the businesses, but will surely add to the frustrations of accessing these facilities.</p> <p>In terms of encouraging walking, cycling and public transport – the station may be in walking or cycling distance for some of the development, but there will still be a need to travel by car to other facilities at greater distances.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Whilst governments discuss measures for reducing our impact on our environment, the proposed planning disrupts and destroys established ecosystems in orchards, fields, and conservation areas.</p> <p>The “New Barns and Broadwater Farm” Conservation Area is vital in preserving and supporting a variety of habitats for wildlife to survive and prosper, many of which contain species which are “at risk”.(See SA 6 response below for definition of this area).</p> <p>Some Important Wildlife in this area :</p> <p>* Larks nesting and singing in the Broadwater fields</p> <p>* Buzzards hunting</p>	<p>effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>SA objective 6 relates to the landscape and townscape, not the historic environment. The historic environment is dealt with separately under SA objective 7: heritage. Site 59740 receives a significant negative effect in relation to SA objective 7. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59740 already receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding and contains a water body.</p> <p>Site 59740 already receives a significant negative effect in relation to SA objective 9: soil, as it is a greenfield site that contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 12: air quality, site 59740 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p>

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		<p>* Fieldfares and Redwings (both Conservation Status Red – ref RSPB) arriving here on their winter migration to feed in the fields and roost in the orchards and surrounding trees.</p> <p>* Nuthatch</p> <p>* Wood Peckers (Greater Spotted, and Green)</p> <p>* Water voles in New Barns Cotts pond.</p> <p>* Polecat seen in the area</p> <p>* Badgers</p> <p>* Rural Foxes</p> <p>* Owls – Brown and Tawny</p> <p>* Bats</p> <p>Ironically, the proposed suggestion for playing fields and green spaces amongst the housing is to be built at the expense of existing green space, pathways and rural landscape (with the addition, of course, of noise and light pollution.)</p> <p>SA Objective 6: To protect and enhance the borough’s landscape and townscape character and quality</p> <p>Recognised by TMBC in 1993, the “New Barns and Broadwater Farm Conservation Area” was set up to acknowledge and protect the special relationship between “the two distinct groups of historic buildings at New Barns and Broadwater Farm”, “with their strong visual links across farmland”.</p> <p>See Map below</p> <p>The Broadwater Farm area with its bridleways and footpaths acts as a green wedge between East and West Malling, Larkfield and Kings Hill – all very different communities with their own local heritage and character.</p> <p>A Green wedge provides a continuous green corridor connecting WM Manor Park via New Barns hamlet, and bridleway through Broadwater and along the ancient route to East Malling parish.</p> <p>The Quiet Lane network and footpaths needs to be protected</p>	

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		<p>negating threats to our shrinking rural environment</p> <p>Alongside architectural elements in the landscape, we have the uniquely named Saxon Cwylla.</p> <p>Quoting “Archaeologica Cantiana Vol 89 1974, The Cwylla of King Edmund 942-946” :</p> <p>“King Edmund made a gift of land to the present parish of West Malling “-.... “Of special interest is a reference to a spring or stream near the boundary of East Malling, for which the charter employs the Saxon word ‘Cwylla” (Cwylla = Well Spring).</p> <p>Landscape Context</p> <p>Everywhere landscapes of beauty and character are vanishing with startling rapidity. Too often, frequently overwhelmed by inappropriate or uncaring development. The integrity of conservation areas is fundamental to defending these precious places. It is especially so where smaller conservation areas such as that at “The New Barns and Broadwater Farm Conservation Area” are placed. Here, the surrounding context is doubly important, and its impact must be very thoughtfully considered. Just as every gemstone needs its setting and every picture its frame, so the landscape context of these conservation areas has the capacity significantly to enhance or damage the site’s intrinsic value, and hence its benefit to established surrounding communities.</p> <p>“New Barns and Broadwater Farm Conservation Area” from original TMBC 1993 document</p> <p>Site map showing “New Barns and Broadwater Farm Conservation Area”</p> <p>Includes all Broadwater Farm buildings, New Barns House, Stable Cottage, Willowfields, New Barns Oasts, New Barns Cottages, Asparagus Cottage and Braymead as well as the connecting farmland between.</p>	

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>This is Kent heritage landscape.</p> <p>Any development would utterly destroy the special relationship between “the two distinct groups of historic buildings at New Barns and Broadwater Farm”, “with their strong visual links across farmland”. These qualities were cited and recognised by TMBC in the designated 1993 Conservation Area.</p> <p>To resolve any misconception :</p> <p>The “New Barns and Broadwater Farm Conservation Area” is one entity.</p> <p>It includes all Broadwater Farm buildings, New Barns House, Stable Cottage, Willowfields, New Barns Oasts, New Barns Cottages, Asparagus Cottage, Braymead and connecting farmland.</p> <p>Please note that our response to SA Objective 6 should also be taken into account here, as it applies equally well to this section - the heritage of landscape and architecture cannot be separated.</p> <p>Maps of the Conservation Area are also to be found above in SA 6.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Considering the evidence of :</p> <p>* Local names Broadwater, Well Street, Springhead, Springate Hill, Willowfields, Watercress beds</p> <p>* Local watercourses and ancient ponds – the spring rising at the Cwylla, New Barns Cottages Pond, the stream through Broadwater to East Malling and Bradbourne estate (the Ditton stream).</p>	

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		<p>...the development of this site would have a significant negative and long standing effect on these natural underground water courses</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Highlighted by Brexit, Covid, and now the current supply crisis from world events, food production security should be of primary importance.</p> <p>Development such as that proposed leads to loss of high grade farmland and the potential for farmers to respond to future needs as well as to pursue the role of land managers and conservators of natural resources and landscape amenity.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Contrary to TMBC's assessment for this area, we believe that the proximity of some areas of the development to the railway station when considering emissions and pollution is only a small part of the picture.</p> <p>Any development on the proposed site will inevitably engender traffic to and from schools, shops and other services and outings.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>In contrast to open areas of conservation land with surrounding farmland, an extensive development with associated roads and traffic cannot but reduce the air quality, much less than protect and improve it."</p>	
43619329	Annex 1	"[59632]	Site 59632 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This is in

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		<p>(i) Maidstone Road, St Marys Platt – SA Ref: 59632</p> <p>4.4 The Council has considered this promotion site within its SA and Rydon has reviewed the findings of that SA process. A critique of the SA findings is set out in the table below:</p> <p>Table 3 – Critique of SA Findings in Respect of SA Ref: 59632</p> <p>SA Objective</p> <p>SA Finding</p> <p>Rydon Critique</p> <p>SA Objective 1 – To improve human health and well-being</p> <p>Minor positive (+)</p> <p>Agreed.</p> <p>SA Objective 2 – To improve equality and access to community facilities and services</p> <p>Minor negative (-)</p> <p>The Council has not produced its accessibility evidence to underpin this score.</p> <p>It is noted that 87 of the sites the Council has assessed have been given this score.</p> <p>The SA describes a somewhat arbitrary process of assessment including ranking sites higher that are in or adjacent to settlements higher in the settlement hierarchy without regard to their actual accessibility. The Council already confirms in relation to SA Objective 1 that this site is accessible to certain key facilities. This score should therefore be amended to Positive (+)</p> <p>SA Objective 3 – To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The reason given for the uncertainty of the effect here is that there will need to be capacity available at the nearby schools to accommodate new pupils. It is now well established that contributions from new residential development are provided specifically to fund additional capacity at local schools. The County Education Authority then has a Statutory duty to make that capacity available. The question of whether capacity will exist is therefore not uncertain. This score should therefore be amended to Positive (+)</p> <p>SA Objective 4 – To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p> <p>Whilst it is acknowledged that housing does not directly deliver new employment unless forming part of a mixed use development it is also widely accepted that new housing has a positive beneficial effect in terms of the local economy, both in the short-term during the</p>	<p>accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. SA objective 1: health and wellbeing instead looks at the proximity of sites to healthcare facilities and open space, in addition to walking and cycling paths, play areas and sports facilities.</p> <p>The SA has not ranked sites that are higher in the settlement hierarchy, as the respondent has suggested. However, sites within and close to settlements higher up the hierarchy are likely to have better access to services and facilities than sites elsewhere. Chapter 4 of the Interim SA Report contains the SA of TMBC's Spatial Options.</p> <p>With regard to SA objective 3: education, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. financial contributions). This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities rather than access to employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA correctly identifies the site as falling between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, and within 250m of a locally designated site. Specifically, the site is between 250m and 1km of numerous areas of Ancient Woodland. There is no reference in the SA to the site containing a green infrastructure asset. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location and therefore receives an uncertain significant negative effect in relation to this objective. This is due to the fact the GIS analysis identified some sites as not located near any settlements when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. In the next iteration of the SA, this site will be recorded as falling on the edge of a settlement and so will receive an uncertain minor negative effect.</p>

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		<p>construction process and in the longer-term through household spend that helps sustain local business.</p> <p>This score should therefore be amended to Positive (+)</p> <p>SA Objective 5 – To protect and enhance biodiversity and geodiversity</p> <p>Uncertain minor negative (-?)</p> <p>The conclusion in the SA is entirely without foundation. As the Council confirms there is no certainty that any effect exists. The site does not comprise either an internationally or nationally designated site nor indeed a locally designed site. Reference is made to the site containing an existing green infrastructure asset but again this is made without any justification. In Rydon's view the site is relatively unconstrained in terms of biodiversity and it is usual that mitigation measures will be included as part of any planning application in due course following detailed site-specific surveys.</p> <p>This score should therefore be amended to likely effect uncertain (?)</p> <p>SA Objective 6 – To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site is not a designated open space and is located adjacent to an established and sustainable settlement. There is no basis for the Council's conclusion that there may be a significant negative effect here. An appropriately designed residential scheme could be achieved that has a positive townscape effect. The illustrative masterplan attached at Appendix 1 clearly demonstrates how this could be achieved.</p> <p>This score should there be amended to Positive (+)</p> <p>SA Objective 7 – To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>Again the Council has no evidence to support this conclusion. The presence of a heritage asset within 250m of this site does not in any way indicate that development will give rise to a significant negative effect.</p> <p>Whether there is an effect or not will depend on the nature of the heritage asset and the assessment of its significance. Even then harm may not arise or harm that does arise could be mitigated. It is not possible therefore for the Council to reach the conclusion that it has.</p> <p>By contrast Rydon's heritage consultant Orion has undertaken an assessment of the impact of development on the site would have on heritage assets (see Appendix 1).</p> <p>That assessment confirms that it is unlikely development on the site would have any negative effects. This score should be amended to Negligible (0).</p>	<p>SA utilises a precautionary approach. As such, there is potential for a site within close proximity to a heritage asset to have a significant negative effect on SA objective 7: heritage. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets. This is a 'policy-off' appraisal and so consideration is not given to mitigation. Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, the site receives a mixed uncertain minor negative and negligible effect as although it is not within Flood Zones 2 or 3, it falls within Source Protection Zone 3 and so there is potential that development could affect water quality.</p> <p>With regard to SA objective 9: soil, the site has been appraised in line with the site assessment criteria. Although the respondent states that the site is too small to operate viably for agriculture, it could form part of a larger site for agriculture. Regardless of this, the Agricultural Land Classification still applies when land is not actively being used for agricultural purposes.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". Site 59632 is still expected to have a positive effect in relation to this objective, albeit minor.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8 – To protect and enhance the quality of water features and resources</p> <p>Negligible (0)/Uncertain minor negative (-?)</p> <p>This site is within FZ1 on the Environment Agency Flood Risk Mapping.</p> <p>The proximity of the site to a Source Protection Zone is unlikely to give rise to any significant effects. Rydon therefore agrees with the Council's scoring.</p> <p>SA Objective 9 – To conserve and enhance soil resources and guard against land contamination</p> <p>Uncertain significant negative (--?)</p> <p>The approach taken here by the Council is overly simplistic. The presence of Grade 3 agricultural land is only one part of considering the impact of development on the land. It must also be important to consider the scale of the site as a viable parcel of agricultural land. The site is too small to operate viably for agricultural, which is evidenced by the fact that it is currently unused scrub. The impact of its loss is therefore reduced. The land is unmanaged scrubland and has not been in productive agricultural use for over 20 years. The impact of the loss of the site for development is therefore further reduced.</p> <p>This score should be amended to Negligible (0).</p> <p>SA Objective 10 – To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Minor Positive (+)</p> <p>The site is well related to the settlement that it adjoins. There is no justification given for only scoring this as a minor positive effect. The score should be amended to Significant Positive (++)</p> <p>SA Objective 11 – To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>Agreed.</p> <p>SA Objective 12 – To protect and improve air quality</p> <p>Negligible (0)</p> <p>Agreed.</p> <p>SA Objective 13 – To protect material assets and minimise waste</p> <p>Uncertain minor negative (-?)</p> <p>Whilst the site may be within a minerals safeguarding area its size and location, enclosed by the railway line to the north, the A25 to the south, Maidstone Road to the east and Platt Church of England School to the West renders it unviable for mineral extraction. The</p>	

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		<p>development of the site would not therefore give rise to any negative impact in terms of minerals.</p> <p>The score should be amended to Negligible (0).</p> <p>SA Objective 14 – To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Minor positive (+)</p> <p>The Council's justification for only awarding a minor positive effect here is totally flawed.</p> <p>Sites smaller than 100 dwellings frequently deliver a range of dwelling types and sizes including affordable housing. Additionally sites of this size are not dependent on strategic scale infrastructure and can deliver housing quickly, which given the Council's poor track record and consequent housing need is of vital importance. This score should therefore be amended to Significant positive (++)</p> <p>4.5 On the basis of the above critique an updated SA assessment for the site is set out in the table below:</p> <p>Table 4 – Updated SA Assessment for Maidstone Road, St Marys Platt – Site Ref: 59632</p> <table><tr><td></td><td>SA1</td><td>SA2</td><td>SA3</td><td>SA4</td><td>SA5</td><td>SA6</td><td>SA7</td><td>SA8</td><td>SA9</td><td>SA10</td><td>SA11</td><td>SA12</td><td>SA13</td><td>SA14</td></tr><tr><td>TMBC</td><td>+</td><td>-</td><td>+</td><td>0</td><td>-?</td><td>--?</td><td>--?</td><td>-?/0</td><td>--?</td><td>+</td><td>0</td><td>0</td><td>-</td><td></td></tr><tr><td>?</td><td>+</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Rydon</td><td>+</td><td>+</td><td>+</td><td>+</td><td>?</td><td>+</td><td>0</td><td>-</td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>?/0</td><td>0</td><td>++</td><td>0</td><td>0</td><td>0</td><td>++</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table> <p>4.6 The promotion site therefore scores far more highly when properly assessed against the SA than the assessment conclusions drawn by the Council."</p>		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	TMBC	+	-	+	0	-?	--?	--?	-?/0	--?	+	0	0	-		?	+														Rydon	+	+	+	+	?	+	0	-							?/0	0	++	0	0	0	++									
	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14																																																																
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43619329	Annex 1	<p>"(ii) Clare Lane, East Malling – SA Ref: 59698</p> <p>4.7 The Council has considered this promotion site within its SA and Rydon has reviewed the findings of that SA process. A critique of the SA findings is set out in the table below:</p> <p>Table 5 – Critique of SA Findings in Respect of SA Ref: 59698</p> <p>SA Objective</p> <p>SA Finding</p> <p>Rydon Critique</p> <p>SA Objective 1 – To improve human health and well-being</p>	<p>Site 59698 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This is in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. SA objective 1: health and wellbeing instead looks at the proximity of sites to healthcare facilities and open space, in addition to walking and cycling paths, play areas and sports facilities.</p> <p>With regard to SA objective 3: education, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. financial contributions). This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that</p>																																																																											

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		<p>Minor positive (+)</p> <p>SA Objective 2 – To improve equality and access to community facilities and services</p> <p>Minor negative (-)</p> <p>The Council has not produced its accessibility evidence to underpin this score.</p> <p>It is noted that 87 of the sites the Council has assessed have been given this score. The SA describes a somewhat arbitrary process of assessment including ranking sites higher that are in or adjacent to settlements higher in the settlement hierarchy without regard to their actual accessibility. The Council already confirms</p> <p>in relation to SA Objective 1 that this site is accessible to certain key facilities. The Accessibility Assessment attached at Appendix 2 confirms the site has good access to a wide range of services and facilities. This score should therefore be amended to Positive (+)</p> <p>SA Objective 3 – To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain significant positive (++?)</p> <p>The reason given for the uncertainty of the effect here is that there will need to be accommodate new pupils. It is now well established that contributions from new residential development are provided specifically to fund additional capacity at local schools. The County Education Authority then has a Statutory duty to make that capacity available. The question of whether capacity will exist is therefore not uncertain. This score should therefore be amended to Significant positive (++)</p> <p>SA Objective 4 – To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p> <p>Whilst it is acknowledged that housing does not directly deliver new employment unless forming part of a mixed use development it is also widely accepted that new housing has a positive beneficial effect in terms of the local economy, both in the short-term during the construction process and in the longer-term through household spend that helps sustain local business.</p> <p>This score should therefore be amended to Positive (+)</p> <p>SA Objective 5 – To protect and enhance biodiversity and geodiversity</p> <p>Uncertain minor negative (-?)</p> <p>The conclusion in the SA is entirely without foundation. As the Council confirms there is no certainty that any effect exists. The site does not comprise either an internationally or nationally designated site nor indeed a locally designed site. Reference is made to the site containing an existing green infrastructure asset but again this is made without</p>	<p>contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA correctly identifies the site as falling between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, and/or within 250m of a locally designated site. Specifically, the site is between 250m and 1km of Ancient Woodland. There is no reference in the SA to the site containing a green infrastructure asset. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, the site is correctly recorded as receiving an uncertain significant negative effect, as although it is near a settlement, it is not on the edge of the settlement. This is a 'policy-off' appraisal and so consideration is not given to mitigation. Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis.</p> <p>SA utilises a precautionary approach. As such, there is potential for a site within close proximity to a heritage asset to have a significant negative effect on SA objective 7: heritage. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets. This is a 'policy-off' appraisal and so consideration is not given to mitigation. Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 9: soil, the site has been appraised in line with the site assessment criteria. Although the respondent states that the site is too small to operate viably for agriculture, it could form part of a larger site for agriculture. Regardless of this, the Agricultural Land Classification still applies when land is not actively being used for agricultural purposes.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals</p>

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		<p>any justification. In Rydon's view the site is relatively unconstrained in terms of biodiversity and it is usual that mitigation measures will be included as part of any planning application in due course following detailed site-specific surveys.</p> <p>This score should therefore be amended to likely effect uncertain (?)</p> <p>SA Objective 6 – To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site is not a designated open space and is located adjacent to an established and sustainable settlement. There is no basis for the Council's conclusion that there may be a significant negative effect here. An appropriately designed residential scheme could be achieved that has a positive townscape effect. The illustrative masterplan attached at Appendix 2 clearly demonstrates how this could be achieved.</p> <p>Furthermore the Landscape and Visual Technical Note prepared by Liz Lake Associates and attached at Appendix 2 confirms that there will only be limited effects of change to the LCA locally and no change to the overall perception or character of the LCA as a whole. The Technical Note also confirms that the proposed development will have only limited visibility. This score should there be amended to Positive (+)</p> <p>SA Objective 7 – To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>Again the Council has no evidence to support this conclusion. The presence of a heritage asset within 250m of this site does not in any way indicate that development will give rise to a significant negative effect.</p> <p>Whether there is an effect or not will depend on the nature of the heritage asset and the assessment of its significance. Even then harm may not arise or harm that does arise could be mitigated. It is not possible therefore for the Council to reach the conclusion that it has.</p> <p>By contrast Rydon's heritage consultant Orion has undertaken an assessment of the impact of development on the site would have on heritage assets (see Appendix 2). That assessment confirms that providing the design and layout of any development on the site has regard to the existing limited views of heritage assets the site can come forward without harming the setting of those assets.</p> <p>This score should be amended to Negligible (0).</p> <p>SA Objective 8 – To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p>	<p>Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". Site 59698 is still expected to have a positive effect in relation to this objective, albeit minor.</p>

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		<p>Agreed.</p> <p>SA Objective 9 – To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The approach taken here by the Council is overly simplistic. The presence of Grade 1 or 2 agricultural land is only one part of considering the impact of development on the land. It must also be important to consider the scale of the site as a viable parcel of agricultural land. The site is too small to operate viably for agricultural, which is evidenced by the fact that it is currently unused scrub. The impact of its loss is therefore reduced.</p> <p>This score should be amended to Negligible (0).</p> <p>SA Objective 10 – To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant positive (++)</p> <p>Agreed.</p> <p>SA Objective 11 – To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>Agreed.</p> <p>SA Objective 12 – To protect and improve air quality</p> <p>Negligible (0)</p> <p>Agreed.</p> <p>SA Objective 13 – To protect material assets and minimise waste</p> <p>Uncertain minor negative (-?)</p> <p>Whilst the site may be within a minerals safeguarding area its size and location, enclosed by the railway line to the north, the A25 to the south, Maidstone Road to the east and Platt Church of England School to the West renders it unviable for mineral extraction. The development of the site would not therefore give rise to any negative impact in terms of minerals.</p> <p>The score should be amended to Negligible (0)</p> <p>SA Objective 14 – To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Minor positive (+)</p> <p>The Council's justification for only awarding a minor positive effect here is totally flawed. Sites smaller than 100 dwellings frequently deliver a range of dwelling types and sizes including affordable housing. Additionally sites of this size are not dependent on strategic scale infrastructure and can deliver housing quickly, which given the</p>	

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		<p>Council's poor track record and consequent housing need is of vital importance.</p> <p>This score should therefore be amended to Significant positive (++).</p> <p>4.8 On the basis of the above critique an updated SA assessment for the site is set out in the table below:</p> <p>Table 6 – Updated SA Assessment for Clare Lane, East Malling – Site Ref: 59698</p> <table><tr><td></td><td>SA1</td><td>SA2</td><td>SA3</td><td>SA4</td><td>SA5</td><td>SA6</td><td>SA7</td><td>SA8</td><td>SA9</td><td>SA10</td><td>SA11</td><td>SA12</td><td>SA13</td><td>SA14</td></tr><tr><td>TMBC</td><td>+</td><td>-</td><td>++?</td><td>0</td><td>-?</td><td>--?</td><td>--?</td><td>0</td><td>--</td><td>++</td><td>0</td><td>0</td><td>-</td><td></td></tr><tr><td>?</td><td>+</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>Rydon</td><td>+</td><td>+</td><td>++</td><td>+</td><td>?</td><td>+</td><td>0</td><td>0</td><td>0</td><td>++</td><td>0</td><td>0</td><td>0</td><td></td></tr><tr><td>++</td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td></tr></table> <p>4.9 The promotion site therefore scores far more highly when properly assessed against the SA than the assessment conclusions drawn by the Council."</p>		SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	TMBC	+	-	++?	0	-?	--?	--?	0	--	++	0	0	-		?	+														Rydon	+	+	++	+	?	+	0	0	0	++	0	0	0		++															
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43619329	Annex 1	<p>"4.10 It is apparent from Rydon's assessment of its promotion sites in the context of the SA that there are many inaccuracies and flaws in the SA work that the Council has undertaken. Just taking the 2 promotions sites explored in these representations demonstrates that the SA needs to be revisited and the assessment results for the sites amended to reflect a proper and accurate assessment.</p> <p>4.11 Rydon commends its 2 promotion sites to the Council all of which are sustainable locations that fit within the spatial strategy option advocated in these representations that can deliver a range of dwelling types and sizes early in the Plan period to help rectify the significant housing crisis facing the Borough. Rydon is happy to work with Officers to further develop the site-specific evidence base underpinning its 2 promotion sites and to discuss how they can help contribute towards meeting the housing needs of the Borough in a sustainable manner."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>																																																																											
43619329	Annex 1	<p>"5.0 Key Changes Required to Make a Sound Plan</p> <p>5.1 As currently presented and, recognising that this is only the Regulation 18 consultation stage, the Draft Plan is not sound nor is it legally compliant.</p> <p>5.2 Significant work is required by the Council to rectify the deficiencies identified through these representations. In summary the</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>																																																																											

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		<p>key changes required before the Council will be able to present a Sound Plan are:</p> <p>5. Revisit the SA to correct the clear flaws in the assessment work undertaken, particularly those instances where the conclusions drawn are wrong when having regard to the available evidence;</p> <p>6. Revisit the SA assessment of sites, particularly the 3 promotion sites put forward by Rydon to address the inaccuracies in the scoring given;"</p>	
43629217	Annex 1	<p>"[59688]</p> <p>Q8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report?</p> <p>Gladman have some concerns about the accuracy and robustness of the individual site assessments in Appendix D, specifically Hilden Golf Course.</p> <p>Site 59688- Hilden Golf Course</p> <p>The site existing use is as a golf centre and sports facility. It is triangular in form and enclosed to the south by Stocks Green Road (B207), to the north by a trainline and to the west by Rings Hill. Hildenborough Station is located to the immediate northwest and is operated by Southeastern providing regular services to London Charing Cross, Tunbridge Wells and Hastings. Hildenborough is accessible to the east of the site.</p> <p>The sustainability appraisal has identified a number if uncertain significant negative effects, which we regard as overly negative and require further consideration.</p> <p>SA Objective 5 is rated uncertain significant negative effect due to the potential loss of onsite green. As the site is in use as a golf course, certain landscape features will be manmade, and manicured thus reducing the site's overall biodiversity value. Where tree belts and structural planning exists, these would be retained as part of any development. Given that development would also require a biodiversity net gain to be achieved, the overall result of development would be an increase to the site biodiversity value resulting positive, not negative score.</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, the SA acknowledges the fact the site contains some green infrastructure assets. This is in accordance with the site assessment criteria. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Additionally, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). This ensures all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via a policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>With regard to SA objective 6: landscape and townscape, the site has been appraised in line with the site assessment criteria. Whether a site comprises greenfield or brownfield land is considered separately under SA objective 9: soil.</p> <p>SA utilises a precautionary approach. As such, there is potential for a site within close proximity to a heritage asset to have an uncertain significant negative effect on SA objective 7: heritage. This is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 8: water, the proforma states that the site is either within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. As the site contains land with a 1 in 30 year risk of surface water flooding, the SA is correct.</p>

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		<p>SA Objective 6 is rated as uncertain significant negative effect. The assessment considers development would result in the loss of open space. Whilst loss of greenspace would be an inevitable consequence of development, the use as a golf course means it is not a greenfield site. The site is contained to the north by significant tree belt, and internally benefits from other plantings that would further contain development. We consider the site's assessment should therefore be neutral.</p> <p>SA Objective 7 is rated uncertain significant negative effect as there are Listed Buildings located near to the site. Whilst there are nearby a small number of listed buildings to the south and west, the site clearly has no historical linkage to these buildings. There is also sufficient space available for buffers and offsets to be provided to mitigate any impacts, should this be necessary. Therefore, we consider the effect should be considered uncertain negative to account for the site providing suitable mitigation.</p> <p>SA Objective 8 is rated significant negative / uncertain significant negative. The assessment finds the site is within Flood Zone 3 and/or area with a 1 in 30 year risk of surface water flooding. This is incorrect. This site located wholly within a Flood Zone 1 and is not impacted by surface water flooding.</p> <p>Overall, Gladman consider that the Interim Sustainability Appraisal does not currently operate as a suitable basis for determining the locations of development. The Council will need to consider Green Belt release sites and Gladman consider that the ISA and the Green Belt Review be thoroughly reviewed prior to future consultations."</p>	
43779649	Annex 1	<p>"[Site reference 59709]</p> <p>Sustainability Appraisal</p> <p>It appears from the SA that the site may not have been assessed accurately against all criteria. The site, which measures c.12 ha, is sustainably located on the edge of Borough Green and offers excellent access to local shops, schools and services, including Borough Green and Wrotham Railway Station. We support the outcome of sustainability assessment against objectives 1, 3 and 10. The site's location on the existing settlement boundary will support sustainable access to a range of local amenities.</p> <p>The site is assessed to have an 'uncertain significant negative' impact on local biodiversity and ecology, heritage assets, as well as townscape and landscape quality. Constraints identified include Flood</p>	<p>Site 59709 has been appraised in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect for the reasons outlined in its proforma. Specifically, the site contains green infrastructure assets and is also within 250m of two areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity</p>

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		<p>Zone 3, alongside surface water flooding, although it should be noted these affect only part of the site, not the whole.</p> <p>Our response to the questionnaire includes an analysis of the scoring given to the site against the SA objectives and it is clear from this analysis, that a review of particular scorings is necessary. We therefore kindly request that the site is reassessed against the SA criteria with particular focus being directed towards Objectives 5, 6 and 8."</p>	<p>present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59709 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regards to SA objective 8: water, the site receives an uncertain significant negative effect for the reasons outlined in the proforma. Specifically, it contains land with a 1 in 30 year risk of surface water flooding, in addition to a watercourse. The uncertainty is due to the fact the site contains a watercourse and falls within Source Protection Zond 2. Therefore, its development could result in adverse effects on water quality, although this is uncertain at this stage of assessment.</p>
24986657	Annex 1	<p>"Sustainability Appraisal.</p> <p>1. Treatment of climate change.</p> <p>Chapter 3 of the SA clearly outlines the importance of addressing Climate Change, indicates what is expected of a Local Plan in this regard, and what the implications are of not addressing this issue. The SA understands the relationship of all the objectives to achieving a holistic approach to adaptation and mitigation. The SA rightly indicates how important strong LP development management policies are for reducing the carbon footprint of the Borough and resisting any increase. However scoring the strategic and spatial options in any depth is impossible without an up to date evidence base and detailed topic paper.</p> <p>The Borough has adopted a Climate Change Strategy. The local plans must reflect the aspirations and targets of this strategy. Parishes are producing their own strategies as encouraged and are supporting the Borough's own targets. The only way these targets can be met are if this Local plan reflects the need to build to zero carbon standards and take every opportunity to produce renewable energy either as part of development or off site to provide new infrastructures and district heating. Nothing has been done in producing an evidence base that identifies opportunities. Other Local authorities have and are grasping this 'nettle'. They are requiring building standards higher than building regulations. This Local Plan is to take us to 2040 it must be clear that the Borough will not accept new development that does not meet the highest standards. The opportunities for producing renewable energy should be properly investigated as this could be a major influence in where new development could be the most sustainable. The SA does</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The SA contains references to TMBC's Climate Change Strategy in Appendices B (Review of Relevant Plans, Policies and Programmes) and C (Baseline Information).</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is an entire section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. For this reason, it is not the purpose of the SA to inform an 'exceptional circumstances study'. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>not have this evidence base from which to test the strategic and spatial options and individual sites.</p> <p>Where are the current areas creating the biggest footprint? What would each choice of option have on them? Could it reduce it? Would it exacerbate it? Which are the locations where there are opportunities for increases in green infrastructure, biodiversity and natural solutions? Where are the opportunities for providing sources of renewable energy and district heating to both new and existing development? Which areas can cope with more development due to existing infrastructure capacity (Electricity and gas grid, waterbodies and different geology (for ground source), road network capacity, water and sewerage capacity). Which is more carbon costly- to upgrade existing infrastructures or build new? Huge areas need investigation before there can be full understanding of the impact of any chosen option on the carbon footprint in the Borough.</p> <p>Without a climate evidence base the SA is flawed.</p> <p>2. The Green Belt – lack of evidence base</p> <p>The SA of individual sites should have screened out sites in the Green Belt to determine what is available outside the Green Belt and how that impacts on emerging alternative spatial options. This would then have informed the 'exceptional circumstances study'.</p> <p>A joint Green Belt study across the 3 Boroughs involved in the 2 HMAs needs to have been undertaken to determine which areas of the Green Belt are most important, and which are least important when judged against the 5 purposes of the Green Belt as set out in the current NPPF. This should have been done with Tunbridge Wells and Sevenoaks at least before they submitted/submit their LPs and was called for by consultees at the previous T&M LP examination. This has not yet been done and without it is impossible to properly identify areas that could be released and qualify as 'exceptional circumstances'."</p>	
42380353	Annex 1	<p>"* Comments on Annex 1</p> <p>The Green Belt is not a constraint that is screened for in this iteration of the assessment of sites. It should have been seen as a constraint that needed to be applied in order to indicate the amount land available for development outside the Green Belt. This should have been done to justify the need for 'exceptional circumstances. (There should also have been a Green Belt study to indicate the most vulnerable areas of the Green Belt in relation to its 5 functions as part of evidence base.)</p> <p>AONB should also have been screened out. There is much more land outside the AONB in the Borough than there is of land outside the Green Belt. There are therefore no exceptional circumstances that</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. For this reason, it is not the purpose of the SA to inform 'exceptional circumstances'. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), and this may include sites located within the AONB.</p> <p>The SA is too high-level to consider busy road junctions and so the Council will commission additional evidence on matters including traffic. The SA is also too high-level to give consideration to the gas network, electricity grid, pipelines and the sewage network, but these are things that will instead be considered at planning application stage if the sites are allocated.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>would justify releasing land from the AONB for development. No land should be allocated in the AONB.</p> <p>Comments on individual sites 59779, 59825 and 59827:</p> <p>Common to all three sites:</p> <ul style="list-style-type: none"> * The junctions at both ends of Back Lane are dangerous and Back Lane experiences speeding traffic since the road is used as a cut through to from the A228/A26- to A227 and cross country to the A21 * The bus stop mentioned in relation to site 59779 is only used at school times and provides no better service than to the other two sites in terms of accessibility to the current school bus route. * All three are unsustainable and undeliverable unless huge changes are made to the current policies covering conservation and enhancement of this AONB Village in the GB. * The village is not on the gas network so the current electricity grid would need upgrading to sustain any new developments in these sites. * The pipes for providing water supply are inadequate for new development * Sewerage and land drainage is also under pressure and overflows are already experienced as mentioned on site 59827. * Any one of these sites would have a huge impact on the character and landscape of this small village which has no services other than the small primary School, already oversubscribed. * 59827 has been identified in the Para 5.41 of the Sustainability Appraisal as being a least sustainable site option for allocation, the other 2 have not been so identified. All three should have been identified as 'a least sustainable site option for allocation'. <p>Site 59779:</p> <ul style="list-style-type: none"> * Green Belt and the Kent Downs AONB, edge of Shipbourne Conservation Area. * Poor drainage on southern boundary. 	<p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. With regard to the AONB, all three sites receive a significant negative effect in relation to SA objective 6: landscape and townscape, due to the fact they are within 500m of the AONB. The SA also acknowledges that the three sites are not within close proximity to a large settlement and are instead in rural locations.</p> <p>SA objective 8: water deals with flooding and water quality, acknowledging that sites 59779 and 59827 are at risk of surface water flooding. The SA does not acknowledge a watercourse on the southern edge of site 59827, as it is in fact beyond the site boundary.</p> <p>With regard to schools (SA objective 3: education), the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Paragraph 5.41 in the Interim SA Report correctly identifies the least sustainable site options.</p> <p>With regard to site 59779, the SA acknowledges that the site is within 250m of heritage assets (which includes Shipbourne Conservation Area), against SA objective 7: heritage.</p>

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		<p>* Access onto Back Lane in close proximity to main access to Shipbourne Primary school. Danger to school children and congestion at pick up and drop off times.</p> <p>* Dangerous junction of Back Lane with the A227.</p> <p>* Bus stop on the A227 currently only provides a school service.</p> <p>* There is an active covenant on this land restricting development. It is therefore undeliverable.</p> <p>Site 59825:</p> <p>* Green Belt, Kent Downs AONB, within the Shipbourne Conservation Area.</p> <p>* Very open site.</p> <p>* Dangerous access onto narrow Upper Green Road, or onto Back Lane.</p> <p>* Proposed mixed development on this site is questionable. There is no identifiable need for social housing in Shipbourne.</p> <p>Site 59827:</p> <p>* Green Belt, Kent Downs AONB and the edge of the Conservation area.</p> <p>* Open site</p> <p>* There are land drainage issues on this site and a watercourse runs along the southern boundary.</p> <p>* There are already issues with sewer overflow across the site.</p> <p>* Dangerous access onto Back Lane or narrow Reeds Lane and dangerous junctions at either end of Back Lane</p> <p>"</p>	
44309601	Annex 1	<p>"[59424]</p> <p>59424 Clearheart Lane</p> <p>SA Objective 1: To improve human health and well-being</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare</p>

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		<p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is oversubscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The local environment has limited community facilities. The community centre is inadequate for the current population and further competition would result in decreased availability for existing service users. The sports park is largely football (a new rugby pitch has been built, but not used significantly to-date, raising concerns about its viability) with four tennis courts, two of which have been permanently assigned to a single tennis club, limiting availability for ad-hoc hirers. The status of facilities, all being leased from one of the parties developing the site, means that there is potentially no long-term benefit to the community of the significant S.106 investments raising further concerns about long-term viability.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils. KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being reassigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p>	<p>facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>The site assessment criteria for SA objective 2: services and facilities consider the accessibility band that each site has been placed within in the Urban Capacity Study (July 2022), as this provides an indication of the overall accessibility of a site in relation to access to services and site location. Site 59424 falls within the Good Accessibility Band and therefore receives a negligible effect in relation to SA objective 2.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, he site is incorrectly recorded as being within a settlement when it is on the edge of a settlement. This is as a result of the GIS analysis identifying a high percentage overlap between the site and settlement boundaries. In the next iteration of the SA, this site will receive an uncertain minor negative effect in relation to this objective.</p> <p>With regard to SA objectives 7: heritage and 8: water, respondent has not expressed any disagreement over the effects given.</p> <p>SA objective 9: soil considers whether a site is greenfield or brownfield, in addition to the Agricultural Land Classification. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. Priority Habitats are not</p>

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		<p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost because of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>The site is a major wildlife corridor joining the woods of Warren Wood and Cattering Wood. Loss of this important</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Negative (-)</p> <p>This site is located outside a settlement. The boundaries of the settlement were sold off separately by MOD to protect the surrounding countryside and concentrate development on the brownfield land.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land. The area is registered by DEFRA as 'Priority Habitat Inventory - Deciduous Woodland (England)'. Site contains Ancient Woodland and TPO protected trees.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Major negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available.</p>	<p>specifically considered in the SA but almost all Priority Habitats in the Borough are covered by the green infrastructure assets layer under SA5. The site receives a minor negative effect in relation to SA objective 9 because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59424 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negative (-)</p> <p>The Site is an area of woodland surrounding the existing development. This provides a green lung for the area, and helps prevent some of the worst excesses of temperature on hot days; it is well documented that trees have a cooling effect on the environment and that is evidenced when walking around Kings Hill on a hot day in Summer, where a walker will experience a wall of heat when reentering the village from the surrounding woodland.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the secondary access has been determined to be via the Teston Road, for which the primary access to the trunk road network is likely to be through Wateringbury. The addition of houses with access along the Wateringbury Road is likely to increase the number of vehicles turning right at the A26 / Red Hill traffic lights, which will significantly impact the throughput of the junction and the increase in pollution in that area. In addition, the main access road would be through a quiet residential cul-de-sac which already has significant parking problems, resulting in potential issues with access.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area. These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain positive (+)</p> <p>The site is initially expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, this would be at the expense of destruction of Ancient Woodland, and mature trees that are subject to TPO; previous estimates of housing densities for this site are below 100 dwellings and hence the value is uncertain.</p>	
44309601	Annex 1	"[59531]	With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more

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		<p>59531 Tower View SE</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village,</p>	<p>of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of sites 59531 and 59534 may result in the loss of open space, both sites receive an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, both sites have been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, both sites are already recorded as having minor negative effects. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 8: water, site 59534 receives a mixed minor negative and negligible effect because although it does not contain a water body or watercourse or fall within a Source Protection Zone, it contains land with a 1 in 100 year risk of surface water flooding.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service</p>

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		<p>and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p> <p>.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p>	<p>frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, sites 59531 and 59534 have been appraised in line with the site assessment criteria. As neither is within 100m of an AQMA, both receive a negligible effect.</p> <p>With regard to SA objective 14: housing, sites 59531 and 59534 have been appraised in line with the site assessment criteria. As both sites have the potential to provide fewer than 100 dwellings, both receive minor positive effects.</p> <p>With regard to SA objectives 6: biodiversity and geodiversity, 7: heritage, 9: soil, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for sites 59531 and 59534. They have also not expressed any disagreement over the effect given for site 59531 in relation to SA objective 8: water.</p>

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		<p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment.</p> <p>59534 Tower View NW</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. Only by reducing the use would there be</p>	

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		<p>any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.</p> <p>.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p>	

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p>	

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		<p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment."</p>	
44309601	Annex 1	<p>"[59544]</p> <p>59544 Cellini Walk</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost because of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Site 59544 does not contain open space and so is not recorded as containing open space in its proforma.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59544 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a minor negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even</p>

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		<p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost as a result of new development.</p> <p>.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p>	<p>result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59544 is recorded as having a negligible effect as it is located within a settlement. Biodiversity and geodiversity sites are dealt with separately under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 7: heritage, the boundary of site 59544 has been drawn so as to avoid the heritage asset at its centre. However, the SA still record the site as having a significant negative effect as it is within 250m of this heritage asset. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59544 receives a mixed minor negative and negligible effect because although it does not contain a water body or watercourse or fall within a Source Protection Zone, it contains land with a 1 in 100 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, the site receives a minor negative effect because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land. Biodiversity is dealt with separately under SA objective 5, which gives consideration to locally designated sites.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objectives 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effect given.</p> <p>With regard to SA objective 12: air quality, site 59544 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59544 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

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		<p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is a conservation area that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, the conservation area currently contributes to the improvement of air quality in the area.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make</p>	

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		them economically unviable unless the solution was totally inappropriate for the environment."	
44309601	Annex 1	<p>"[59547]</p> <p>59547 Discovery Drive</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill road network would result in significant disruption to local residents. Access would need to be across a bridleway.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of site 59547 may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59547 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59547 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development. Biodiversity and geodiversity sites are dealt with separately under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 7: heritage, site 59547 does not contain a heritage asset. However, as it is located within 250m of a heritage</p>

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		<p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.</p> <p>.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?)</p> <p>The site would result in the loss of a designated conservation area. Such building would radically change the nature of the area in a detrimental way.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--?)</p> <p>The site contains a heritage asset. The value of this asset would be essentially lost, even if the asset itself could be maintained, by building residential dwellings around it.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination Negative (-)</p> <p>The site is a conservation area that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p>	<p>asset, it receives an uncertain significant negative effect in relation to this objective.</p> <p>With regard to SA objectives 8: water, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p> <p>With regard to SA objective 9: soil, the site receives a minor negative effect because it comprises greenfield land and contains less than a significant proportion of Grade 1, 2 or 3 agricultural land. Biodiversity is dealt with separately under SA objective 5, which gives consideration to locally designated sites.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, site 59547 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59547 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, the conservation area currently contributes to the improvement of air quality in the area.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment."</p>	
44309601	Annex 1	<p>"[59634]</p> <p>59634 Hoath Wood</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant Negative (--)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Site 59634 has been appraised in accordance with the site assessment criteria.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network and flooding. Flooding is considered separately under SA objective 8: water. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59634 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>Also, the KCC Strategic plans for cycle connectivity included a cycle route directly through the middle of this site, and this would be lost if the development proceeded.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, access would either need to be via the quiet lanes to the North of Kings Hill, or through the public open space that is currently used for soak-aways for the Kings Hill road network potentially resulting in more frequent flooding of the roads on Kings Hill.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites.</p> <p>The site contains an existing green infrastructure asset that would be lost as a result of new development; much of the site is Ancient Woodland, and is bordered by more ancient woodland to the West. In addition, the site provides a wildlife corridor from the Warren Wood</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59634 is recorded as having a significant negative effect. This is due to the fact it contains some Ancient Woodland and green infrastructure assets. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59634 is recorded as having a minor negative effect as it is located on the edge of a settlement. The effect is uncertain, as the actual effect is dependent on the final design, scale and layout of development. The SA gives all sites that are within 500m of the AONB a significant negative (--) effect, in recognition of the potential for development outside of, but near to the AONB, to have an effect. Site 59634 is not within 500m of the AONB. The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to identify which sites are actually visible from an AONB. All sites have been appraised consistently using the same buffer distance.</p> <p>With regard to SA objective 7: heritage, 8: water, 13: material assets and waste, respondent has not expressed any disagreement over the effects given for the site.</p> <p>With regard to SA objective 9: soil, site 59634 receives a significant positive effect as it comprises brownfield land.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>nature park and the ancient woodland to the North of Amber Lane through Warren Wood Ancient Woodland to Coalpit Wood Ancient Woodland. The effect of development would be devastating to the biodiversity in the area.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The site would be visible from the AONB of the North Downs and from points along the North Downs Way public footpath, reducing the character of the views. In addition, the development of the site would significantly and detrimentally change the vista from existing dwellings along the North edge of Kings Hill and many other dwellings with visibility in that direction.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--) / Negligible (0)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>Much of the site is Ancient Woodland. Most of the rest of the site is Grade 2 agricultural land.</p> <p>Although there was a small historic single storage location in its centre, that does not provide any justification for considering the site as a whole as brownfield.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p>	<p>Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas for both sites that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59634 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59634 has been appraised in line with the site assessment criteria. As it has the potential to provide 100 dwellings or more, it received a significant positive effect. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland.</p>

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		<p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The destruction of a significant area of ancient woodland would reduce the capacity of the area to absorb Carbon Dioxide from the air. Even if the trees were replaced, it would be several decades before the level of absorption would reach the level provided by the trees that are there at present..</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Uncertain Negative (-?)</p> <p>The site is not within 100m of an AQMA. However, any access to the North would be via quiet lanes, and road traffic would impact on the safety and air quality of those lanes for recreational users.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain minor positive (+?)</p> <p>Although the site is expected to comprise 100 dwellings or more, that would be dependent on the destruction of a significant area of ancient woodland. If the ancient woodland was avoided, the number of dwellings would be much less than 100, and there would be restrictions in the mix of sizes, types and tenures."</p>	
44309601	Annex 1	<p>"[59655]</p> <p>59655 Teston Road</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an exitsing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Site 59655 has been appraised in accordance with the site assessment criteria.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network and flooding. Flooding is considered separately under SA objective 8: water. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59655 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide</p>

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		<p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The site is in a poor accessibility band. The primary access is via the Teston Road and either via Wateringbury Road through East Malling or Red Hill via the Wateringbury traffic lights, both of which have traffic issues.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost because of new development. The site is greenfield in a Green Belt area.</p> <p>The site provides an open wildlife corridor joining the woods of Warren Wood and Cattering Wood.</p> <p>Loss of this important link would result in the deterioration of both sites.</p>	<p>to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59655 is recorded as having a significant negative effect. This is due to the fact it contains some Ancient Woodland and green infrastructure assets. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59655 is incorrectly recorded as having an uncertain minor negative effect in relation to this objective, as it is not on the edge of a settlement but just outside of a settlement. In the next iteration of the SA Report, the site will have an uncertain significant negative effect. The effect is uncertain, as the actual effect is dependent on the final design, scale and layout of development.</p> <p>With regard to SA objective 7: heritage, 8: water, 13: material assets and waste, respondent has not expressed any disagreement over the effects given for the site.</p> <p>With regard to SA objective 9: soil, site 59655 receives a significant negative effect, as it is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality.</p>

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		<p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain Negative (-?)</p> <p>The site is located outside of a settlement. One of the few public footpaths and public roads skirts the site and are used for recreation; development will significantly impact the visual amenity of what is currently a rural vista.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)/Uncertain Negative (-?)</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse but falls within or partially within Source</p> <p>Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use. Primary access is expected to be via the Teston Road, and from there either via East Malling or Watlingbury, either of which will result in additional traffic issues for those areas</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the</p>	<p>With regard to SA objective 11: climate change adaptation, we state in the proformas for both sites that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59655 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59655 has been appraised in line with the site assessment criteria. As it has the potential to provide 100 dwellings or more, it receives a significant positive effect.</p>

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		<p>new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the increase of traffic on the Watlington Road associated with this development will impact the AQMAs on the A20 and at the Watlington traffic lights</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, the site is not sustainable, given the transport links and access to a service centre, and hence the practicability of the site is in question."</p>	
44309601	Annex 1	<p>"[59884]</p> <p>59884 Tower View NE</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--?)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both). However, the existing healthcare facility is massively over-subscribed.</p> <p>The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development. Only by reducing the use would there be any chance of reducing the impact, and that would immediately put into question the viability of this site.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). As development of site 59884 may result in the loss of open space, the site receives an uncertain significant negative effect in relation to this objective (as part of a mixed effect).</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59884 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those</p>

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		<p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>Although the site is placed within the Very Good Accessibility Band, the requirement to provide access to the core Kings Hill Road network would result in significant disruption to that road network impacting on large numbers of the existing population.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Negative (-)</p> <p>The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or is within 250m of a locally designated site. The site is an existing green infrastructure asset that would be lost because of new development.</p> <p>.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The site would result in the loss of designated open spaces. Such building would radically change the nature of the area in a detrimental way.</p>	<p>schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relates more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59884 is recorded as having a minor negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59884 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59884 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p>

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Negative (-)</p> <p>The site is greenfield land that contains a less than significant proportion (<25%) of Grade 1, 2 or 3 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant Negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA However, it is a core route through Kings Hill, and any impact on through-traffic would have an overall detrimental impact on the air quality within Kings Hill.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p>	<p>With regard to SA objective 14: housing, site 59884 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect.</p> <p>With regard to SA objectives 7: heritage, 8: water, 9: soil, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59884.</p>

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		<p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p> <p>Negligible (0)</p> <p>The site is expected to provide only a few dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would, and the infrastructure requirements would likely make them economically unviable unless the solution was totally inappropriate for the environment."</p>	
44309601	Annex 1	<p>"[59752]</p> <p>Downs and Mereworth</p> <p>59752 East of A228 South of Lapins Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be considered. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p>	<p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, site 59752 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor negative effect against this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relates more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59752 is recorded as having a significant negative effect because it contains some Ancient Woodland and green infrastructure assets. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This</p>

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		<p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e., >=25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding.</p>	<p>would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59752 is recorded as having an uncertain minor negative effect as it adjoins a settlement and so may be more easily integrated into existing built development.</p> <p>Site 59752 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets, including Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59752 receives an uncertain significant negative effect, as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59752 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, site 59752 has been appraised in line with the site assessment criteria. As site 59752 has the potential to provide 100 dwellings or more, it receives a significant positive effect.</p> <p>With regard to SA objectives 1: health and wellbeing, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59752.</p>

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		<p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture;</p> <p>even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Watlington is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient</p>	

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		woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities."	
44309601	Annex 1	<p>"[59755]</p> <p>59755 Seven Mile Lane</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p>
44309601	Annex 1	<p>"[59758]</p> <p>59758 North of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p>
44309601	Annex 1	<p>"[59759]</p> <p>59759 North of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p>
44309601	Annex 1	<p>"[59760]</p> <p>59760 South of Kent Street</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent</p>

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			with the spatial strategy, it may still be considered a reasonable alternative.
44309601	Annex 1	<p>"[59761]</p> <p>59761 Kate Reed Wood</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be considered. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village,</p>	<p>With regard to SA objective 1: health and wellbeing, site 59761 receives a mixed uncertain significant negative and minor positive effect. The uncertain significant negative effect is due to the fact the site contains open space, which could be lost as a result of development although this is uncertain.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than the road network. AQMA's are dealt with separately under SA objective 12: air quality. Therefore, site 59761 has been appraised in accordance with the site assessment criteria and it is correct that it receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59761 is recorded as having a significant negative effect. This is due to the fact it contains some Ancient Woodland and green infrastructure assets. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59761 is recorded as having a significant negative effect because although it is located on the edge of a settlement, it contains open space that could be lost as a result of development.</p> <p>Site 59761 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects</p>

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		<p>and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source</p> <p>Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p>	<p>are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59761 receives a negligible effect in relation to SA objective 8: water, as it is at risk of flooding or contains a water body or watercourse, or falls within a Source Protection Zone.</p> <p>With regard to SA objective 9: soil, site 59761 receives a minor negative effect, as it is greenfield land and contains a less than significant proportion of Grade 1, 2 or 3 agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59761 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objective 13: material assets and waste, respondent has not expressed any disagreement over the effect given.</p> <p>With regard to SA objective 14: housing, site 59761 has been appraised in line with the site assessment criteria. As it has the potential to provide fewer than 100 dwellings, it receives a minor positive effect. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland.</p>

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		<p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities."</p>	
44309601	Annex 1	<p>"[59448, 59449, 59450]</p> <p>Small site, no comment"</p>	Noted.
44309601	Annex 1	<p>"[59630]</p> <p>59630 Fields North or Amber Lane</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--)</p>	<p>With regard to SA objective 1: health and wellbeing, site 59630 receives a mixed uncertain significant negative and minor positive effect. The uncertain significant negative effects are due to the fact it contains open space, which could be lost as a result of development although this is uncertain.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than the road network. AQMAs are dealt with separately under SA</p>

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		<p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>The site is within an area of open space that was originally provided by one of the parties developing the site, in-line with the description of the Site for the Phase 2 submission as agreed by the inspector. However, the site has been withdrawn by one of the parties developing the site, much to the disgust of the residents, with a fence, which is regularly vandalised, even though it was registered as an Area of Community Value. Indeed, the only planned access is via Warren Woods Nature Park, with the planned removal of trees, even though one of the parties developing the site has agreed a maintenance plan for the area, which would clearly be invalidated by turning some of the woods into a road.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band. The access would be via Amber Lane which is not wide enough to support the number of dwellings that would make the site economically viable.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p>	<p>objective 12: air quality. Therefore, site 59630 has also been appraised correctly in that it receives a significant negative effect in relation to this objective. In terms of access to the site, the SA is too high-level to give consideration to site-specific access points. This is something that will instead be determined at planning application stage, if the site is allocated.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comments regarding safeguarded employment land relate more specifically to the Local Plan than they do the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59630 is recorded as having a significant negative effect. This is due to the fact it contains a green infrastructure asset and is adjacent to some Ancient Woodland. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59761 and 59630 are recorded as having significant negative effects because although they are located on the edge of a settlement, both contain open space that could be lost as a result of development.</p> <p>Site 59761 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Sites 59761 and 59630 receive negligible effects in relation to SA objective 8: water, as neither is at risk of flooding or contains a water body or watercourse, or falls within a Source Protection Zone.</p>

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		<p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost because of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>The site is a major wildlife corridor joining the woods of Warren Wood and Hoath Wood. Loss of this important link would result in the deterioration of both sites.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. On appeal, the inspector rejected the appeal including the impact on the vista. The development would be out of character with the rest of Kings Hill and clearly not part of that development, being separated from it by an area of ancient woodland.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land that is Grade 2 agricultural land. The area is designated by DEFRA as: Priority Habitat Inventory - Traditional Orchards (England) and, although one of the parties developing the site dug up all the apple trees, one of the options they suggested to the inspector at the Phase 2 planning appeal was that the area could be used as an orchard.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p>	<p>With regard to SA objective 9: soil, both sites receive a minor negative effect, as they are greenfield land and contain a less than significant proportion of Grade 1, 2 or 3 agricultural land. Most of site 59630 is classified as Non Agricultural, with a smaller proportion of the site classed as Grade 2 agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In terms of site 59630 containing a green infrastructure asset, this is dealt with separately under SA objective 5.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, sites 59761 and 59630 have been appraised in line with the site assessment criteria. As neither is within 100m of an AQMA, both receive a negligible effect in relation to this objective.</p> <p>With regard to SA objective13: material assets and waste, respondent has not expressed any disagreement over the effect given.</p> <p>With regard to SA objective 14: housing, sites 59761 and 59630 have been appraised in line with the site assessment criteria. As both sites have the potential to provide fewer than 100 dwellings, they receive minor positive effects. Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland.</p> <p>With regard to SA objectives 7: heritage and 13: material assets and waste, respondent has not expressed any disagreement over the effects given for site 59630.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live on Kings Hill, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negative (-)</p> <p>The site is not within 100m of an AQMA. However, the restricted access to the Kings Hill Road network will result in local areas of congestion which will impact on local residents. The existing increased numbers of residents in the area has resulted in increased traffic to the Kings Hill sports centre, and such traffic will impact on congestion for access to this site.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain Negligible (0?)</p>	
44309601	Annex 1	<p>"[59631]</p> <p>59631 Heath Farm, Wateringbury Road</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Negative (-)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both), the only vehicular access to the</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facilities is along a route which is in excess of 10 miles round-trip. The open fields that had been provided as part of the Warren Woods nature park, including this site, have now been identified as potential development sites. The site overlaps the recently-created trim trail, which would need to be re-routed to allow for this development.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Significant negative (--)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, only primary schools are provided, and the direct access is via unlit fields, unless going by car, which would be a round-trip of more than 10 miles.</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. In addition, the bus routes for school pupils do not currently support this location.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The location of this residential site means that transport to employment locations is largely through narrow roads that are limited in their capacity, restricting the opportunities for employment.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm.</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth related to the delivery of employment opportunities rather than access to employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59631 is recorded as having an uncertain significant negative effect as it is not located near any settlements in rural locations</p> <p>With regard to SA objectives 2: services and facilities, 7: heritage, 8: water, 9: soil, 10: climate change mitigation, 11: climate change adaptation, 12: air quality, 13: material assets and waste and 14: housing, respondent has not explicitly expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. The location was identified by one of the parties developing the site in the Kings Hill Phase 2 submission as public open space with good connectivity to the public footpath network, and on appeal, the inspector agreed to the development on the basis that the development was in line with the descriptions provided for the use of Heath Farm.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Negligible (0)/Uncertain Negative (-?)</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1.</p> <p>The site does not contain a water body or watercourse but falls within or partially within Source Protection Zones 2 and 3. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Negative (-)</p> <p>The site is more than 800m from a railway station and more than 400m from a bus stop and cycle route.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.</p>	
44309601	Annex 1	<p>"[59636]</p> <p>Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically next to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use."</p>	As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.
44309601	Annex 1	<p>"[59673]</p> <p>Small site, no comment"</p>	Noted.
44309601	Annex 1	<p>"[59698, 59715, 59726]</p> <p>Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a significant round-trip distance, so even though the site is physically close to built-up areas, it is not strategically connected to it, and nearby roads are designated as quiet lanes; development would impact on their intended use."</p>	As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.
44309601	Annex 1	"[59740]	With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>59740 Broadwater Farm</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Significant negative (--)</p> <p>Although the site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility, the existing healthcare facility is over-subscribed with roughly twice as many patients registered as is recommended under guidelines. The addition of further residents who would need to be dependent on this facility would be that the level of service would not be acceptable to either the new or existing residents.</p> <p>The site would be over the KCC strategic cycle route and hence prevent implementation, resulting on a negative impact on the wellbeing of existing residents of Kings Hill.</p> <p>The site currently provides countryside for Kings Hill residents. The withdrawal of open space within Heath Farm by one of the parties developing the site has restricted the available options for Kings Hill residents, and further restrictions should be avoided.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Negative (-)</p> <p>The site is placed within the Fair Accessibility Band. Travel to Kings Hill centre or West Malling village (assuming parking spaces are available) would result in a round-trip distance of around 5 miles, so even though the site is physically next to Kings Hill, it is not strategically connected to it.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Significant negative (--)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on the site, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health. Adding a further stop for students in this site would further increase journey times increasing the issues.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p>	<p>The site is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an open space (Heath Farm Country Park) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlement of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p>

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		<p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. Proof would need to be provided if consideration was to be given to amelioration of the impact of development</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>As determined in the previous Local Development Framework, the site is a major wildlife corridor joining the East Malling Heath and beyond to West Malling and beyond. Loss of this important link would result in the deterioration of wildlife in the overall area.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located next to several small villages, and its implementation would result in a complete change from a rural area with villages to a continuous urban sprawl from Maidstone to West Malling and beyond. This would be a complete change of the character of the whole area from villages in a rural environment to urban sprawl and should be avoided. In addition, the value of conservation areas in the site would be largely lost.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. These would be severely reduced in value by development. These include the Cwylfa, the searchlight and generator buildings from the second world war, and land anchors for the previous hop fields as noted in the deeds for the area.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection</p>	<p>Site 59740 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater". This SA objective does not look at impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objectives 9: soil, 11: climate change adaptation, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Zones and water bodies are uncertain at this stage. The water from the site drains into an area where it is extracted, and pollution from development would impact on the quality of the extracted water</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land and contains a significant proportion (>=25%) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Negative (-)</p> <p>Most of the site, including the areas where the developer previously indicated that the dwellings would be built, is more than 800m of a railway station. There are multiple areas of concern regarding how the site could be effectively linked into the road system without impacting on quiet lanes and further work is required before this site should be considered for progressing further with regards to viability.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA. However, the major road networks: the A20 and M20 are both subject to AQMA and additional traffic from this development would impact significantly on those links.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
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44309601	Annex 1	<p>"[59624, 59654, 59664, 59700, 59722, 59723, 59728, 59729]</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p>
44309601	Annex 1	<p>"[59797]</p> <p>59797 West part of Kings Hill Golf Course</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour,</p>	<p>Site 59797 receives a mixed uncertain significant negative and minor positive effect in relation to SA objective 1: health and wellbeing because it contains an area of open space that could be lost as a result of development, although this is uncertain. The site is also within 800m of an open space and walking path.</p> <p>With regard to SA objective 2: services and facilities, site 59797 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective. The SA is too high-level to consider road width. Air Quality Management Areas (AQMAs) are considered separately under SA objective 12: air quality. As site 59797 is not within 100m of an AQMA, it receives a negligible effect. In terms of distance to service centres, the SA utilises the Urban Capacity Study, which considers distance to service centres. The capacity of service centres is not considered and would be difficult to quantify.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59797 is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on</p>

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		<p>meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p>	<p>biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59797 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development, although this is uncertain.</p> <p>Site 59797 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 10: climate change mitigation, the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10". Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59797 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objectives 8: water, 9: soil, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59797.</p>

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		<p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities."</p>	
44309601	Annex 1	<p>"[59799]</p> <p>59799 Pizien Well</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further</p> <p>59800 East part of Kings Hill Golf Course</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is within 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being in excess of an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p> <p>Site 59800 receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing because it contains an area of open space that could be lost as a result of development, although this is uncertain. This is mixed with a minor positive effect, because despite the site containing an open space, it is within 800m of other areas of open space and a walking path.</p> <p>Site 59800 is placed in the Poor Accessibility Band, not the Fair Accessibility Band. For this reason, it receives a significant negative effect in relation to SA objective 2: services and facilities. The SA is too high-level to consider road width. Air Quality Management Areas (AQMA) are considered separately under SA objective 12: air quality. In terms of distance to service centres, the SA utilises the Urban Capacity Study, which considers distance to service centres. The capacity of service centres is not considered and would be difficult to quantify.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59800 is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59800 is recorded as having an uncertain significant negative effect as it</p>

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		<p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous. For example, Mereworth Castle would lose its setting.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p>	<p>contains an open space that could be lost as a result of development, although this is uncertain. There is also uncertainty as the actual effect will depend on the final design, scale and layout of development.</p> <p>Site 59800 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. However, it is not within 250m of Mereworth Castle. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59800 receives an uncertain significant negative effect. The uncertainty is as result of the fact the effect resulting from proximity to water bodies is uncertain at this stage.</p> <p>With regard to SA objective 10: climate change mitigation, site 59800 receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59800 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objectives 9: soil, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59800.</p>

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		<p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, being on the A26, the impact on the AQMA at the traffic lights in the centre of Wateringbury is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities."</p>	
44309601	Annex 1	<p>"[59802]</p> <p>59802 Vineyard South of Hollandbury Park</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path / play area/ sports facility (but not both).</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Fair Accessibility Band. However, the A228 at that point is very narrow for a trunk road, and any access via it is likely to impact on safety on that road; linking in via the A26 may be considered, but the immediate effect on the AQMA at the</p>	<p>Site 59802 is placed in the Poor Accessibility Band, not the Fair Accessibility Band. For this reason, the site receives a significant negative effect in relation to SA objective 2: services and facilities .The SA is too high-level to consider road width. Air Quality Management Areas (AQMA) are considered separately under SA objective 12: air quality. In terms of distance to service centres, the SA utilises the Urban Capacity Study, which considers distance to service centres. The capacity of service centres is not considered and would be difficult to quantify.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

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		<p>Wateringbury traffic lights would need to be taken into account. The distance to service centres also needs to be determined; West Malling is at capacity and would not cope with such additional load, and Kings Hill only has a limited scope of services.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Negative (-)</p> <p>The site is withing 800m of an existing secondary school or a primary school (but not both).</p> <p>However, there are issues with capacity available at those facilities to accommodate new pupils.</p> <p>KCC has been presented with an opportunity for a new school to be built on another site in the area, but have indicated that it would not be cost-effective, and this leads to the assumption that it would not be built or manned, which demonstrates that the availability of secondary schools in the area is an issue. Existing pupils in Kings Hill often have journey times to or from school being more than an hour, meaning that they spend over two hours a day travelling, which is not sustainable in terms of mental health.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negative (-)</p> <p>The pressure to build houses in Kings Hill has resulted in safeguarded employment land being re-assigned to residential building. This has upset the balance that was intended for Kings Hill as a garden village, and additional housing without additional opportunities for employment will further impact the sustainability of the village.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. This includes ancient woodland at least some of which that would be lost by such a development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Significant negative (--)</p> <p>The site is located beyond the edge of a settlement. The impact on the view from the South would be disastrous. The impact on the A228 would be disastrous, with country views replaced by urban sprawl for a significant distance.</p>	<p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. The respondent's comment regarding safeguarded employment land relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59802 is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59800 is recorded as having an uncertain significant negative effect as it contains an open space that could be lost as a result of development, although this is uncertain. There is also uncertainty as the actual effect will depend on the final design, scale and layout of development. Site 59802 is incorrectly recorded as having an uncertain significant negative effect, when it is located on the edge of a settlement. In the next iteration of the SA Report, it will receive an uncertain minor negative effect in relation to SA6.</p> <p>Site 59802 receives a significant negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, site 59802 receives an uncertain significant negative effect. The uncertainty is as result of the fact the effect resulting from proximity to water bodies are uncertain at this stage.</p> <p>With regard to SA objective 10: climate change mitigation, sites 59800 and 59802 receive minor positive effect as although they are more than 800m from a railway station, they are within 400m of a bus stop. For SA10, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the</p>

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		<p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Significant negative (--)</p> <p>The site is located within 250m of a heritage asset. The change of vista associated with such a development would be disastrous.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)</p> <p>The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The site contains a water body or water course or falls within or partially within Source Protection Zone 1.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The site is greenfield land in greenbelt and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant negative (--)</p> <p>The site is more than 800m from a railway station and although it is within 400m of a bus stop, there are restricted bus services available. For example, there are no mid-to-late evening buses, which means that to live in the area, residents are very dependent on car use.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Significant negative (--)</p> <p>The site contains ancient woodland; removal of that resource would impact on carbon capture; even replacing the trees would take several decades to reach the level of absorption of the current woodland</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Significant negative (--)</p> <p>The site is not within 100m of an AQMA. However, with access via Canon Lane being on the A26, the impact on the AQMA at the traffic lights in the centre of Watlington is likely to be significant.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain Negative (-?)</p> <p>The site is within a Minerals Safeguarding Area. The site is within a Minerals Safeguarding Area.</p> <p>These effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for</p>	<p>achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Biodiversity is dealt with separately under SA objective 5, which gives consideration to Ancient Woodland. It is noted, however, that the presence of trees aids climate change mitigation through the absorption of carbon dioxide.</p> <p>With regard to SA objective 12: air quality, site 59802 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objectives 1: health and wellbeing, 9: soil, 13: material assets and waste and 14: housing, respondent has not expressed any disagreement over the effects given for site 59802.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Significant positive (++)</p> <p>The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. However, working around the ancient woodland and other wooded areas may reduce the benefit unless other more inappropriate approaches were taken to increase dwelling densities."</p>	
44309601	Annex 1	<p>"[59803, 59845]</p> <p>It is noted that, being in the green belt and without appropriate access to a service centre, these sites are NOT consistent with ANY of the spatial strategy options and should not be considered further"</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p>
44309601	Annex 1	<p>"[59441]</p> <p>Kings Hill are concerned that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North."</p>	<p>The SA is too high-level to consider additional traffic on the A228 and busy road junctions, and so the Council will commission additional evidence on matters including traffic.</p>
44309601	Annex 1	<p>"[59442, 59443, 59445, 59456]</p> <p>Kings Hill have concerns that additional traffic onto the A228 in the vicinity of the M20 roundabout would impact on traffic flows in the area causing problems for access to/from Kings Hill to the North."</p>	<p>The SA is too high-level to consider additional traffic on the A228 and busy road junctions, and so the Council will commission additional evidence on matters including traffic</p>
44309601	Annex 1	<p>"[59447, 59488, 59594, 59602, 59603, 59619, 59620, 59621, 59622, 59645, 59699, 59714, 59716]</p> <p>West Malling is the primary local service centre, and is already at capacity with regards to parking, with frequently 'circling' the car park to get a space when it becomes available. Any significant number of additional dwellings in the area will result in overloading of the infrastructure at the centre of West Malling, making Kings Hill unsustainable if it cannot access an appropriate local service centre."</p>	<p>The SA is too high-level to give consideration to the availability of car parking spaces.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
44309601	Annex 1	<p>"[59658, 59672]</p> <p>The A20 is approaching (or, in some areas, exceeding) capacity. Adding further access roads is contrary to policy SQ8, especially given the closeness of other roads in the area, such as Town Hill to West Malling and the Birling Road, and the presence of Parkfoot garage nearby. The impact of such development could impact on the safety and throughput of the A20."</p>	The SA is too high-level to consider these issues, and so the Council will commission additional evidence on matters including traffic.
44309601	Annex 1	<p>"[59733]</p> <p>Access to this Site would be via King Hill, at a junction close to a very busy roundabout. KHPC consider that this would impact on road throughput and safety, especially with cars coming off the roundabout at speed, having to stop for cars waiting to turn right into the proposed site."</p>	The SA is too high-level to consider these issues, and so the Council will commission additional evidence on matters including traffic.
44350945	Annex 1	<p>"[59694] - Copy Table 2 saved in folder named R161_221103_Steve Harding (AXIS) FCC Environment</p> <p>2.0 SITE ID 59694 – RESPONSE TO SUSTAINABILITY APPRAISAL</p> <p>2.1.1 AXIS has reviewed the appraisal of the Site, undertaken as part of the SA process, which is included in Annex 1 of the SA. There are concerns that the performance of the Site against certain SA objectives have been appraised in a simplistic manner without further interrogation, or in the absence of current, publicly available information. There has been extensive assessment work undertaken as part of previous consenting regimes, much of which is in the public domain1.</p> <p>2.1.2 Commentary against the scoring of the SA objectives has been provided below in Table 1, which is followed by our own assessment of how the Site should have been scored, taking this scoring into account. We feel that when this information is given due regard, the opportunity that this site affords is clear.</p> <p>2.1.3 Table 2 provides a visual summary of how the two appraisal processes compare.</p> <p>"</p>	<p>SA objective 3: education explores the proximity of sites to schools. As site 59694 is proposed for employment uses, SA objective 3 is not relevant. Although there is potential for employment sites to offer opportunities for work experience and apprenticeships, this cannot be guaranteed.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, due to the proximity of the site to an area of Ancient Woodland and the fact it contains green infrastructure assets, it receives a significant negative effect. The effect is uncertain as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). This ensures all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via policy containing site-specific mitigation measures, it will be appraised on a 'policy-on' basis. The SA does not utilise Natural England's SSSI Impact Risk Zones.</p> <p>As the site is located within a settlement, it receives a negligible effect in relation to SA objective 6: landscape and townscape. Sites do not tend to receive positive effects against landscape objectives as SA utilises a precautionary approach and it is likely that any change to the baseline would have adverse effects.</p> <p>With regard to SA objective 7: heritage, the SA utilises Kent's Historic Environment Record. Site 59694 is located within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>Site 59694 receives an uncertain significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact effects resulting from Source Protection Zones are uncertain. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>Site 59694 comprises Grade 2 agricultural land. Therefore, it is correct that it receives a significant negative effect in relation to SA objective</p>

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			<p>9: soil. The fact the site is not connected to any current agricultural use does not change the fact it comprises agricultural land.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Site 59694 receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste as it is within a Minerals Safeguarding Area. Although the site promoter states that the site has already undergone aggregate abstraction, this level of information is not available for most of the sites. So as to ensure consistency, all sites within a Minerals Safeguarding Area are recorded as having an uncertain minor negative effect in relation to this objective.</p> <p>SA objective 14: housing specifically relates to the delivery of housing. As the location of employment sites will not influence housing delivery, this objective is not relevant. However, the proforma incorrectly states 'TBC' under this objective. In the next iteration of the SA Report, it will state "The location of employment sites is not considered likely to affect this objective".</p>
42006241	Annex 1	<p>"[59713 & 59715] Appendix 3 of Rep.</p> <p>Comments on Appendix 1 of SA saved in LUC folder</p> <p>No. R01687 "</p>	<p>Sites 59713 and 59715 have been appraised on a 'policy-off' basis, which means they have been appraised on their physical constraints only with no consideration given to mitigation. This ensures all sites are appraised on a consistent basis. If the sites are allocated in the Local Plan via policy containing mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>The respondent has undertaken their own SA of the two sites. However, their assessment is not in line with the site assessment criteria and takes into consideration mitigation (e.g. contributions towards healthcare facilities and schools).</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022), as explained in Appendix D of the Interim SA Report. The SA acknowledges under SA objective 10: climate change mitigation that both sites are within 800m of a railway station and therefore both receive a significant positive effect in relation to SA objective 10.</p> <p>With regard to SA objective 3: education, the distance covered by catchment areas differs between schools. Although someone may be located within the catchment area of a school, they may not be able to easily access the school, hence the SA uses a distance of 800m.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Although it is noted that Esquire Developments is an SME, this is an appraisal of the site and</p>

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			<p>does not take into consideration who is promoting (or developing) the site.</p> <p>SA utilises a precautionary approach and as explained above, these are 'policy-off' appraisals that do not take into consideration mitigation. With regard to SA objective 5: biodiversity and geodiversity, site 59713 receives a significant negative effect, as it is within 250m of Ancient Woodland. In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). The uncertainty acknowledges the fact there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59715 is incorrectly recorded as having a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. This is due to the fact it is located adjacent to a green infrastructure asset, which overlaps the site. In the next iteration of the SA, the proforma for the site will be updated and it will receive a minor negative effect, as it is within 1km of an Ancient Woodland and Local Wildlife Site (Oaken Wood, Barming). The appraisal does not take into consideration mitigation, which includes Biodiversity Net Gain.</p> <p>Sites 59713 receives an uncertain significant negative effect against SA objective 6: landscape and townscape, as it is not located inside or on the edge of a settlement, but is instead not near any settlements. The proforma states that the site is not located near any settlements and/or would result in the loss of designated open spaces. In this instance, the site would not result in the loss of designated open space. Site 59715 is incorrectly recorded as having an uncertain significant negative effect against this objective, when it should receive an uncertain minor negative effect as it is on the edge of a settlement. In the next iteration, the proforma for the site will be updated so that it receives an uncertain minor negative effect in relation to SA6.</p> <p>Site 59713 has been correctly appraised against SA objective 7: heritage, as it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. Site 59715 is also within 250m of numerous heritage assets and although the respondent states that the proposals would entirely preserve the significant of these heritage assets, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p> <p>Site 59713 receives a significant negative effect in relation to SA objective 8: water, as it slightly overlaps some land with a 1 in 30 year risk of surface water flooding. We note that the overlap is very small. Site 59715 receives an uncertain minor negative effect as it falls within Source Protection Zone 3 but it is uncertain what effect this could have on water quality.</p>

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			<p>Site 59713 receives a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 2 agricultural land. The Agricultural Land Classification still applies when a site is not actively being used for agricultural purposes.</p> <p>With regard to SA objective 10: climate change mitigation, the sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise sites. However, if a site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised taking into account the sub-objectives.</p> <p>With regard to SA objective 11: climate change adaptation, again this is a 'policy-off' appraisal and so consideration is not given to mitigation. All sites receive a negligible effect in relation to this objective for the reasons provided in the site assessment criteria in Appendix D of the Interim SA Report.</p> <p>With regard to SA objective 13: material assets and waste, the SA at this stage does not take into consideration the supply of various minerals. This is because information like this may not be available for other sites and so they would not all be appraised on a consistent basis.</p> <p>With regard to SA objective 14: housing, as already mentioned the site assessment criteria are used to appraise sites, not the sub-objectives. Site 59713 receives a minor positive effect as it will deliver fewer than 100 dwellings.</p>
44462081	Annex 1	<p>"[59828]</p> <p>4.1 The Consultation identifies a range of sites (as made known through the call for sites exercise, Urban Capacity Study and withdrawn Local Plan draft allocations), which comprises the available land to accommodate future development through the emerging Local Plan. This includes the Site (No. 59828) on land to the north of Pratling Street, Aylesford, adjacent to Forstal Business Park.</p> <p>4.2 The Interim SA provides an assessment of each identified site against its 'sustainability appraisal objectives'. Given the number of sites this exercise necessarily has had to be high level, unable to take account of more detailed site-specific information available. This includes the Interim SA's assessment of the Site (No. 59828), where without reference to the current planning application it unjustifiably scores down the sustainable merits of how development should come forwards.</p> <p>4.3 A number of methodology issues are also raised, particularly in respect of the use of the accessibility scoring approach in the Council's Urban Capacity Study for employment sites. As the Urban Capacity Study deals only with options for accommodating housing growth in urban areas, its accessibility scoring approach does likewise; it does not consider the locational requirements of larger employment</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>SA should not and does not take into consideration current planning applications, as this would mean that some sites are appraised using more detail than others when they should all be appraised to a consistent level of detail.</p> <p>Consideration is given to the Urban Capacity Study (July 2022) under SA objective 2: services and facilities. The site assessment criteria consider the accessibility band that each site has been placed within in the Urban Capacity Study, as this provides an indication of the overall accessibility of a site in relation to access to services and site location. Although the Urban Capacity Study considers options for accommodating housing growth, the location of employment sites to community facilities and services is still considered relevant as people may make use of those facilities and services near to their workplaces around working hours. Site 59828 falls within the Poor Accessibility Band and therefore receives a significant negative effect in relation to SA objective 2.</p> <p>As outlined in Appendix D of the Interim SA Report (Site Assessment Criteria), consideration is given to walking distances considered desirable, acceptable and the preferred maximum.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>development that is much less likely to be accommodated within existing settlement confines.</p> <p>4.4 For example the methodology does not reflect the sustainable locational benefits of employment development being adjacent to existing urban area, where positive scoring is only achieved for sites within settlement confines; and it places equal importance to employment sites being accessible to community facilities and services, as to residential development, despite most trips to school and other facilities by families take place from home.</p> <p>4.5 Further, the Interim SA's methodology for accessibility presents a binary position on minimal walking distances, failing to take account that there are accepted 'preferred' and 'maximum' distances beyond what is most desirable.</p> <p>4.6 To assist the Council, these representations provide an updated assessment of the Site compared to the Interim SA's scoring at Appendix A. This comparative scoring exercise identifies the following:</p> <ul style="list-style-type: none"> □ that the Site on the edge of the settlement confines is a sustainable location for commercial development, accessible by sustainable forms of transport, with no objection from Kent County Council Highways & Transportation; □ as employment development would offer training skills and opportunities, such as work experience and apprenticeships, it is incorrect to consider employment sites would have no impact on the objective to improve "levels of educational attainment and skills and training development for all age groups and all sectors of society"; □ there is detailed understanding of Site's ecology, with no objection from either the Biodiversity Officer at Kent County Council or Natural England; □ as the Site is located adjacent to a larger urban area and business park (which forms part of the Medway Gap, including Aylesford as identified in the Urban Capacity Study), the Interim SA is incorrect in considering the Site to be 'not located near any settlements'; □ the heritage impact of the proposed development on the Site is known, with a limited impact at the lowest end of the less than substantial scale; □ the drainage and water management of development on the Site is sufficiently resolved, with agreement from the Lead Local Flood Authority at Kent County Council that: it has been demonstrated that the proposals within this report, as shown by the illustrative masterplan, are compliant with NPPF, PPG and local planning policy, taking predicted climate change allowances into account. It is therefore considered that on implementation of this strategy, the development will remain safe from flood risk and can be suitably drained for the development lifetime <p>4.7 Overall, the scoring of the Interim SA significantly underscore the sustainability of the Site, as summarised in Table 1 (referenced from the comparative exercise at Appendix A).</p>	<p>The SA is too high-level to consider the suitability of sites in terms of neighbouring uses.</p> <p>The location of employment sites is not considered likely to affect SA objective 3: education. This is because although some employment sites offer opportunities for work experience and apprenticeships, others do not and so it cannot be guaranteed that educational opportunities will be provided by new employment development.</p> <p>It is correct that the site is not identified as being located within or adjacent to any settlements, as it is not located near any settlements in a rural location.</p> <p>SA utilises a precautionary approach and therefore if a site is located within close proximity of a heritage asset, it has the potential to result in a significant negative effect. All effects against SA objective 7: heritage are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. drainage and water management). Therefore, it is correct that the site receives negative effects in relation to SA objective 8: water. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

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		<p>Table 1: SA Objectives – Comparative Scoring [SEE FILE SAVED IN LUC FOLDER]</p> <p>R1700 _221103_Andrew Somerville Ramac Holdings</p> <p>4.8 As Table 1 demonstrates employment development on the Site should score significantly better for objectives 2, 3, 4, 5, 6, 7, 8, 9 & 10. Therefore the summary position presented in the Interim SA (paragraph 5.41) that the Site less sustainable than other options is unjustified and does not present a sound evidence base for the emerging Local Plan.</p> <p>4.9 It is noted that this revised scoring is now more consistent with how the Council considered the Site in its Strategic Land Availability Assessment (March 2018) – as a sustainable location adjacent to the confines of Aylesford Village and Aylesford Forstal, suitable for employment / commercial uses.</p>	
44417409	Annex 1	<p>"No we do not agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report. In fact we have serious concerns about the accuracy and robustness of the findings of the SA when it comes to a number of sites in and around Hadlow. Starting with the land east of Carpenters Lane/ north of The Paddock, Hadlow, site reference 59776 we would advise as follows:</p> <p>JAA table 5 – Overview of the SA scoring of site 59776</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>8.2 Given the above we would suggest the sites scoring is revised as below:</p> <p>*image*</p>	<p>Paragraph 3.55 in the Interim SA Report identifies one of eleven key sustainability issues facing Tonbridge and Malling Borough. These key sustainability issues (identified using the baseline information) have been used to develop a set of SA objectives, which provide a framework against which the effects of the Local Plan will be assessed.</p> <p>The site assessment criteria outlined in Appendix D of the Interim SA Report are developed using the SA objectives, and are also reliant on what information the local planning authority has available. The SA is a desk-based strategic assessment and it would not be possible of proportionate for the SA to explore tranquillity.</p> <p>With regard to SA objective 1: health and wellbeing, justification text was not provided due to an error. In the next iteration of the SA Report, justification for the effect against SA objective 1 will be provided. The site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a significant positive effect only in relation to SA1.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. open space provision). This ensures all sites are appraised on a consistent basis. If the site were to be allocated via Local Plan policy containing mitigation measures, it would be appraised on a 'policy-on' basis.</p> <p>The appraisal against SA objective 2: health and wellbeing has been informed by the Urban Capacity Study (July 2022). As the site falls within the Fair Accessibility Band, it receives a minor negative effect in</p>

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		<p>8.3 We would, in terms of objective 6 (landscape), also like to make the following general observations.</p> <p>a) Paragraph 3.55 of the SA states: “The key sustainability issue affecting landscape character and quality within the borough is the pressure of new development within the AONBs and their setting, and the effects this has on the preservation of the key landscape characteristics. This in turn effects levels of tranquillity, particularly in the rural areas of the borough.” There is a tension between this statement and the assessment methodology for Objective 6 as there is no analysis on the physical or perceived relationship with the AONB and therefore tranquillity. Due to this the landscape analysis does not address the key sustainability issue affecting landscape character within the Borough.</p> <p>b) Paragraph 3.56 of the SA states: “The new Local Plan offers an opportunity to ensure that sensitive landscapes are protected and enhanced as appropriate and that development is designed to take account of the variation in character and sensitivity across the borough, through the inclusion of up to date policies which reflect the most recent evidence.” This statement is welcomed and considered to be positively prepared. Site 59776 is not a sensitive landscape due to it being a paddock and its location adjacent to existing residential land uses in Hadlow. Yet, this basic analysis of Site 59776 and other SA sites is not accounted for in the Objective 6 methodology as there is no analysis of landscape features and associated scoring in relation to their landscape sensitivity. Due to this, Site 59776 has scored the same as an area of arable fields, woodlands, and streams, which are highly representative of the rural landscape in comparison to the paddocks within Site 59776 which have a settlement fringe character. Therefore, the omission of an analysis of landscape sensitivity from the methodology is a fundamental flaw of the SA in respect of Objective 6.</p> <p>c) The Sub Objectives to objective 6 are identified as:</p> <ul style="list-style-type: none"> - To protect and enhance landscape character and quality - To protect and enhance townscape character and quality - Protect and enhance the integrity and quality of the borough’s urban and rural landscapes, maintain local distinctives and sense of place - To protect and enhance AONBs within the borough and their settings. <p>Whilst these sub-objectives are welcomed, there is no analysis or inter-relationship between them and the SA conclusions. This is reiterated by the statement in paragraph 5.22 of the SA (see below). Given Site 59776’s location adjacent to Hadlow, its land use as a paddock and its geographic distance from the AONB, it accords positively with these sub-objectives, yet this is not translated into the suggested SA scoring.</p>	<p>relation to this objective. This is in accordance with the site assessment criteria. SA objective 2 does not cover homelessness and so the sub-objective "To tackle homelessness more effectively" will be moved to underneath SA objective 14: housing. Although, it is noted above that the sub-objectives are used when appraising policies, not sites. Access to public transport is considered separately under SA objective 10: climate change mitigation.</p> <p>Site 59776 is incorrectly recorded as containing green infrastructure assets, as it overlaps some green infrastructure assets in its vicinity. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect, as it is within 1km of an area of Ancient Woodland. All negative effects against SA objective 5 are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>SA objective 6: landscape and townscape looks at the effect development of each reasonable alternative development site option may have on the landscape and townscape. The fact site 59776 is a paddock does not relate to the effect its development might have on the landscape.</p> <p>Site 59776 is, however, incorrectly recorded as having a significant negative effect in relation to this objective. In the next iteration of the SA, the effect will be upgraded to a minor negative effect, as the site is located on the edge of the settlement of Hadlow. All negative effects against SA objective 6: landscape and townscape are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>Whether a site comprises brownfield or greenfield land is considered separately under SA objective 9: soils.</p> <p>Site 59776 receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. This is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, the proforma for site 59776 states that it is entirely or significantly within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site contains land with a 1 in 30 year risk of surface water flooding in its south eastern corner and so the significant negative effect against this objective is correct. Again, this is a 'policy-</p>

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		<p>d) Paragraph 5.22 of the SA states “However, all negative effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale, and layout of development, which may help mitigate any adverse effects. If any sites with potential significant negative effects are taken forwards for allocation in the Local Plan, it is recommended that mitigation requirements are built into the associated site allocation policies.” This statement negates the entire premise of Objective 6 being included within the SA. Given the stated sub-objectives (above) a greater analysis should have been undertaken to ascertain the potential differences between the SA sites and provide an effective and justified evidence base. There inherently must be SA sites which would be more suitable than others and therefore score positively, rather than the premises for the SA assessment being entirely negative.</p> <p>e) Appendix D.21 of the SA States “All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. However, the actual effect on landscapes and townscapes will also depend on the design, scale, and layout of development, which may help mitigate any adverse effects. Therefore, all negative effects are recorded as uncertain.</p> <ul style="list-style-type: none"> - Sites that are located within a settlement will have a negligible (0) effect - Sites located on the edge of a settlement will have an uncertain minor negative (-?) effect; and - All sites not located near any settlements in rural locations, and/or would result in the loss of designated open spaces will have an uncertain significant negative (--?) effect.” <p>This is a positive statement, as development on greenfield land will change the landscape character via a new land use and potentially alter vegetation patterns and landform. It is also justified to suggest that site options adjacent to existing urban edges could be more easily integrated and that the actual effect on the landscape will depend on the design. However, the SA is not sound as its analysis fails to correctly identify the spatial relationship between SA sites and the existing settlement patterns. Due to this, locations such as Site 59776 are assessed as not being on the edge of a settlement, when Site 59776 is clearly adjacent to Hadlow and situated within the wider settlement pattern. This failure to effectively analyse the existing settlement pattern and the respective SA locations results in the SA Objective 6 scoring being fundamentally flawed.</p> <p>f) Appendix D.22 of the SA states: “In addition, proximity to the Kent Downs and High Weald AONB’s can provide an indication of the potential for development to have adverse impacts on those designated landscapes.</p> <ul style="list-style-type: none"> - Sites that are within 500m of the AONB could have a significant negative (- -?) effect.” The Kent Downs AONB is 1.7km to the north- 	<p>off’ appraisal and so consideration is not given to mitigation. If the site were to be allocated via Local Plan policy containing mitigation measures, it would be appraised on a ‘policy-on’ basis.</p> <p>With regard to SA objective 10: climate change mitigation, a distance of 400m was considered appropriate walking distance to a bus stop. The site is not within close proximity of a railway station. Therefore, the site correctly receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p> <p>With regard to SA objectives 3: education, 4: economic growth, 9: soil, 11: climate change adaptation, 12: air quality and 14: housing, respondent has not expressed any disagreement over the effects given for site 59776.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p> <p>Site 59846 has been appraised in line with the site assessment criteria and therefore receives a minor positive effect in relation to SA objective 1: health and wellbeing. The SA is too high-level to give consideration to barriers to pedestrian movement.</p> <p>Site 59846 does not contain Ancient Woodland but is within close proximity of Ancient Woodland. It correctly receives an uncertain significant negative effect as it contains green infrastructure assets, in addition to falling within is within 250m of areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). The presence of waterbodies is dealt with separately under SA objective 8: water. The SA correctly acknowledges site 59846 as containing water bodies.</p> <p>Site 59811 contains Ancient Woodland, in addition to green infrastructure assets. Therefore, it correctly receives an uncertain significant negative effect in relation to SA objective 5. The SA correctly acknowledges site 59811 as containing water bodies under SA objective 8.</p> <p>SA objective 6: landscape and townscape does not give consideration to green infrastructure and vegetation cover, which is instead considered under SA objective 5: biodiversity and geodiversity. As mentioned already, the assessment of site 59776 will be corrected to reflect the fact it is located on the edge of a settlement.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>west of site 59766. Therefore, the Site's stated significant negative score cannot be justified on this criterion.</p> <p>8.4 Turning to other sites in Hadlow, we have the following comments:</p> <p>59601 - South of the High Street</p> <p>Objective 6 Given this sites key role in the existing green infrastructure its development is likely to have a high landscape impact, such that its score as Uncertain Minor Negative (-?) should in our opinion be changed to Significant Negative Effects Likely</p> <p>Objective 8 Given this sites location within flood zones 2/ 3 its score as Significant Negative (--)/Uncertain Significant Negative (--?) should in our opinion be reviewed. We would also suggest that it would fail the sequential test as there are other suitable sites within Flood Zone 1 in Hadlow.</p> <p>59859 - West of Carpenters Lane</p> <p>Objective 8 Given this sites location within flood zones 2/ 3 its score as Significant Negative (--)/Uncertain Significant Negative (--?) should in our opinion be reviewed. We would also suggest that it would fail the sequential test as there are other suitable sites within Flood Zone 1 in Hadlow.</p> <p>59806 - North of Hadlow – between A26 and A228</p> <p>Objective 5 Given the fact this site contains areas of ancient woodland within and adjacent to it, as well as a series of hedgerows and ponds within it, the fact it scores the same as site 59776 i.e. Uncertain Significant Negative (--?) is surprising. As set out in table JAA 5 above we believe the scoring of site 59776 should be altered, if however it is not we believe site 59806's score should be amended to Significant Negative.</p> <p>Objective 6 This site is in our opinion more sensitive in landscape terms than site 59776 due to the existing vegetation cover and green infrastructure, as well as its rural location. Yet it obtains the same score of 'Uncertain Significant Negative (--?)' its score cannot in our opinion be comparable. It must be more adverse than site 59776 which is adjacent to Hadlow and is not representative of the wider rural character. We would suggest this sites score is reduced to Significant Negative.</p> <p>59846 - West of Maidstone Road and north of Grove Close</p>	<p>All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>The sequential test is a separate assessment process to the SA and will be used at a later stage in the plan-making process to help inform the SA. All sites have been correctly appraised against SA objective 8: water, in line with the site assessment criteria.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Objective 1 Whilst this site is said to be within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both), we would question how accessible this is given the sites location on the A26, and its score as Minor Positive. This would in our opinion be Negligible.</p> <p>Objective 5 Given the fact this site is 'within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites' and has ancient woodland along its northern edge and to the east beyond Maidstone Road, and also contains a series of waterbodies to the south the fact it scores the same as site 59776 i.e. Uncertain Significant Negative (--?) is somewhat surprising. As set out in table JAA 5 above we believe the scoring of site 59776 should be altered, if however it is not we believe site 59846's score should be amended to Significant Negative.</p> <p>Objective 6 This site is in our opinion more sensitive in landscape terms than site 59776 due to its being highly representative of the rural landscape. Yet it obtains the same score of 'Uncertain Significant Negative (--?)'. Its score cannot in our opinion be comparable. Its landscape impact must be greater than site 59776 which is adjacent to Hadlow and is not representative of the wider rural character. We would suggest this sites score is reduced to Significant Negative.</p> <p>59811 - North of Hadlow – North of Common Lane/ east of Carpenters Lane.</p> <p>Objective 5 Given the fact this site is 'within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites' and contains a couple of small, fragmented areas of woodland within/ adjacent it, one of which is ancient; and large ponds are also present, the fact it scores the same as site 59776 i.e. Uncertain Significant Negative (--?) is surprising. As set out in table JAA5 above we believe the scoring of site 59776 should be altered, if however it is not we believe site 59811's score should be amended to Significant Negative.</p> <p>Objective 6 This site is in our opinion more sensitive in landscape terms than site 59776 due to its being highly representative of the rural landscape Yet it obtains the same score of 'Uncertain Significant Negative (--?)'. Its score cannot in our opinion be comparable. Its landscape impact must be greater than site 59776 which is adjacent to Hadlow and is not representative of the wider rural character. We would suggest this sites score is reduced to Significant Negative.</p> <p>8.5 Having regard to the above it is clear that there are some fundamental flaws in the SA assessment and scoring process and that the document needs a detailed review before the Council look to start allocating sites and progress to Reg 19."</p>	

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44471521	Annex 1	<p>"Site 59773.</p> <p>Comments on the Appendix 1 of the SA</p> <p>See file R1659.</p> <p>"</p>	<p>Site 59773 has been appraised in line with the site assessment criteria as outlined in Appendix D of the Interim SA Report. In accordance with the site assessment criteria, the site receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of open space and walking paths.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022). The SA acknowledges in the site assessment criteria under SA objective 2 "The location of residential sites, as well as mixed use sites incorporating residential development, could affect this objective by influencing people's ability to access existing services and facilities, although it is noted that larger scale development could potentially incorporate the provision of new services" [emphasis added].</p> <p>With regard to SA objective 3: education, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. contributions towards education provision). This ensures all sites are appraised on a consistent basis. All effects against this objective are recorded as uncertain due to uncertainty regarding school capacity.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Although it is noted that an SME would undertake the construction work, this is an appraisal of the site and does not take into consideration who is developing the site.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape and 7: heritage, again this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain and landscaping). If the site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis.</p>
25369441	Annex 1	<p>"Pro Vision are instructed by Cooper Estates Strategic Land Limited ("CESL Ltd" or "CESL") in relation to Land North of Hadlow (Site 59842 within the recent Regulation 18 Consultation).</p> <p>I am writing to you in relation to the Regulation 18 Local Plan Consultation, its evidence base and the current Call for Sites. This letter covers two matters:</p> <p>(i) Our full assessment related to Question 8 and the Interim Sustainability Appraisal ("SA"); and</p> <p>(ii) our Call for Sites submission in respect of Site 59842).</p> <p>Please note that we have also completed and submitted a full response to the Regulation 18 Consultation using the online portal system. Our response number to the consultation document is</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Sites 59647, 59842, 59635 and 59686 all receive different effects in relation to SA objective 8: water. The sentence "The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added] is used for both sites 59647 and 59842. This is correct, as both sites contain land with a 1 in 30 year risk of surface water flooding. Therefore, both sites receive a significant negative effect. The respondent has not acknowledged the fact that there is an additional sentence in each proforma for each of these two sites. In the case of site 59647, the proforma also states "The site does not contain a water body or watercourse or fall within a Source Protection Zone." In</p>

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		<p>#1126502 and our Comment ID number to the Interim SA Annex 1 document is #297. The online system does not enable a full response to be provided in relation to Question 8 or the Interim SA. There is no mechanism to attach our suggested charts which illustrate how we consider the SA should be used.</p> <p>We therefore ask that the Council consider the following additional points in relations to our client's Land at Maidstone Road, Hadlow (Site Reference 59842).</p> <p>(i) Interim SA</p> <p>In our response to the Interim Sustainability Appraisal Annex 1 (Comment ID #297) and Question 8 of the Regulation 18 Consultation (responses number #1126502) we have set out our response to the individual site assessments for a number of sites within Hadlow.</p> <p>We have identified inconsistencies of approach to a number of sites at Hadlow within the Regulation 18 SA. These inconsistencies relate to sites 59647, 59635 and 59853 (and the duplicate of the latter, 59857). These inconsistencies are detailed within CESL's Regulation 18 response #297. However, as explained above, the online comment system does not enable the inclusion of our summary assessments. We consider these are helpful to fully understand the changes we are proposing.</p> <p>The effect of correcting the Site Assessment as discussed in comment #297 would be to amend the individual site assessments proforma as follows:</p> <p>Site 59647</p> <p>There is a discrepancy within this objective between the assessment for Site 59647 and that for Sites 59842, compared with those for Sites 59635 and 59686.</p> <p>Both sites 59647 and 59842 retain the same wording: "The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding."</p>	<p>the case of site 59842, the proforma also states "The site contains a water body or water course or falls within or partially within Source Protection Zone 1. However, these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage". Therefore, the significant negative effect for site 59647 is mixed with a negligible effect as the site does not contain a watercourse or fall within a Source Protection Zone, and the significant negative effect for site 59842 is mixed with an uncertain significant negative effect as the site contains a water body or watercourse, or falls within Source Protection Zone 1. Further to this, it is important to note that these are 'policy-off' appraisals and so consideration is not given to mitigation.</p> <p>Site 59635 receives a negligible effect overall in relation to SA objective 8: water, as unlike sites 59647 and 59842, it does not contain land with a 1 in 30 year risk of surface water flooding. As is the case with site 59647, it also does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59635 and 59853 are correctly assessed as having an uncertain negligible effect. This is because both sites are more than 1km from any internationally or nationally designated biodiversity or geodiversity site, and are over 250m from a locally designated site. Due to an error, justification test was not provided for the effect these sites are expected to have against SA objective 5. In the next iteration of the SA Report, the justification text will be provided.</p> <p>Sites 59647 and 59686 correct receive uncertain minor negative effects in relation to SA objective 5, as they are both between 250m and 1km of an area of Ancient Woodland. In the next iteration of the SA Report, the proformas for these two sites will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report).</p> <p>Site 59842 is correctly assessed as having an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains green infrastructure assets, in addition to falling within 250m and 1km of an area of Ancient Woodland. The SA does not give consideration to TPOs.</p> <p>With regard to SA objective 2: services and facilities, site 59842 is recorded in the Urban Capacity Study as falling within the Fair Accessibility Band and therefore receives a minor negative effect against this objective. This is in accordance with the site assessment. In the next iteration of the SA Report, a percentage symbol will be added to D.1: Accessibility bandings to make it clear that this is based on percentages.</p> <p>Site 59842 contains a heritage asset and is within 250m of numerous other heritage assets, as recorded in the Kent Historic Environment Record. It is therefore correct that the site receives an uncertain significant negative effect.</p>

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		<p>Site 59647 is assessed as “Neutral” (0). As this same “Neutral” (0) categorisation has been applied to Site 59635 and Site 59686, but those sites are in Flood Zones 1 and 2 respectively, the assessments for both Sites 59842 and 59647 are incorrect, and should be “Minor Negative” (-).</p> <p>SA Objective 8 should be amended to “Minor Negative” (-):</p> <p>*image*</p> <p>Site 59635</p> <p>There is a discrepancy within this objective between the assessment for Site 59635 and that for Sites 59647 and 59686. All 3 sites are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site”.</p> <p>Nonetheless, Site 59635 is assessed as “Neutral” (0) while Sites 59647 and 59686 are “Minor Negative” (-).</p> <p>There is no justification for a difference between SA conclusions for Site 59635, compared to those for Sites 59647 and 59686, and this SA objective score for Site 59635 should therefore be amended to “Minor Negative” (-).</p> <p>SA Objective 5 should be amended to “Minor Negative” (-):</p> <p>*image*</p> <p>Sites 59853 and 59857</p> <p>There is a discrepancy within this objective “To protect and enhance biodiversity and geodiversity” between the assessment for Site 59853 and that for Sites 59647 and 59686. All 3 sites are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site”.</p>	<p>Site 59842 receives an uncertain significant negative effect in relation to SA objective 9: soil whereas sites 59647, 59635 and 59686 receive significant negative effects. This is because site 59842 contains a significant proportion of Grade 3 agricultural land but it is unknown whether it is Grade 3a (high quality) or Grade 3b (not classed as high quality) agricultural land, hence the uncertainty. Sites 59647, 59635 and 59686 on the other hand contain a significant proportion of Grade 1 and/or 2 agricultural land. Grades 1, 2 and 3a are considered best and most versatile agricultural land.</p>

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		<p>Nonetheless, Site 59853 is assessed as “Neutral” (0) while Sites 59647 and 59686 are “Minor Negative” (-).</p> <p>There is no justification for a difference between SA conclusions for Site 59853, compared to those for Sites 59647 and 59686, and this SA objective score for Site 59853 should therefore be amended to “Minor Negative” (-).</p> <p>SA Objective 5 should be amended to “Minor Negative” (-):</p> <p>*image*</p> <p>Site 59842 – Land north of Maidstone Road</p> <p>In addition, we have identified inconsistencies relating to a number of SA scores for site 59842 compared with other sites, as well as inaccurate/misleading assessments for the wider site. In particular the results of SA Objectives 2, 7 and 9 are demonstrably incorrect.</p> <p>• SA Objective 2</p> <p>This requires reference to Appendix D of the SA which provides insight as to Accessibility Bandings (in Table D.1). This refers to the methodology “devised by TMBC” and “explained in detail in the Urban Capacity Study” (UCS) [FN1 - SA Appendix D, para D.4]. This explanation occurs on pg15-18 of the UCS and indicates a maximum possible score for any site of 17 points, with UCS Table 5 providing the same bandings as SA Table D.1. The latter omits to explain that the banding is based on percentages, however.</p> <p>It is clear from this that any site scoring 3.6 points or more [FN2 - 21% of 17] would be of “Fair” accessibility, while any achieving 7.0 points or more [FN3 - 41% of 17] would be “Good” and any exceeding 10.4pts or more [FN4 - 61% of 17] would be “Very Good”.</p> <p>Hadlow is a Rural Service Centre in the draft plan, thus all sites at that settlement start from a base of 4 points (by reference to UCS Table 4).</p> <p>We refer you to the promotion document for site 59842. WSP, appointed by the promoter, confirm that the site is within 700 metres of Hadlow village centre, a walking distance of less than 10 minutes. The centre has a range of facilities, including (within 800m walking distance):</p>	

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		<p>*image*</p> <p>The score for site 59842 exceeds that required for ""Good Accessibility". Accordingly, the SA Objective result for Site 59842 should be at least the same as that for 59647, 59635 and 59686, which are all assessed at this level and are "Neutral" (0).</p> <p>However, there is also a bus stop immediately outside the site on Maidstone Road (1pt) from which 3-4 services/hr operate through the week. This frequency constitutes a ""Very Good"" service, within the context of UCS Table 4a (for a further 1.6 pts).</p> <p>Overall, this assessment indicates Site 59842 would score at least 11.1 pts or 65.3% of the available 17 points. This would place it, comfortably, in the ""Very Good"" Accessibility range, by reference to TMBC's own scoring methodology.</p> <p>Other sites with ""Very Good"" Accessibility include withdrawn allocations LP25d (SA Site 59391) and LP25e (SA Site 59392), with these sites afforded a ""Minor Positive"" (+) assessment.</p> <p>This SA objective score for Site 59842 should therefore be amended to ""Minor Positive"" (+).</p> <ul style="list-style-type: none"> • SA Objective 5 <p>There is a discrepancy within this objective between the assessment for Site 59842 and that for Sites 59647 and 59686. All 3 sites retain the same wording: "The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site";</p> <p>Nonetheless, Site 59842 is assessed as "Significant Negative" (--) while Sites 59647 and 59686 are "Minor Negative" (-).</p> <p>If this derives from the presence of a Tree Preservation Order [FN5 - TPO 83/10082/TPO, issued 1983] across site 59842 it is clear from even a cursory review of the plan within the TPO, relative to an aerial photograph, that the A1 area within the TPO is wholly unreflective of the position on the ground. There is no justification for a difference between SA conclusions for Site 59842, compare to those for Sites 59647 and 59686, and this SA objective score for Site 59842 should therefore be amended to "Minor Negative" (-).</p>	

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		<p>• SA Objective 7</p> <p>This objective has been misapplied in relation to Site 59842. The site has been assessed as “Uncertain Significant Negative” (--) due to being located within 250m of a heritage asset.</p> <p>This assessment fails to acknowledge that there is only a single, Grade II Listed Building within 250m of the site. That building is James House [FN6 - https://historicengland.org.uk/listing/the-list/list-entry/1070455?section=official-list-entry], which lies on the opposite side of Maidstone Road approximately 230m away from the proposed entrance to the Site. James House is wholly obscured by intervening built form and vegetation.</p> <p>In contrast, Sites 59647 and 59635 have at least 45 Listed Buildings within 250m, including the Grade 1 Hadlow Tower and several Grade II* listed buildings. Furthermore, both these sites, together with 59686 and 59853, are demonstrably wholly visible from the top of Hadlow Tower[FN7 - By reference to photographs that are publicly available from TripAdvisor, taken during the period when the Tower served as a holiday let.]. Accordingly, these 4 Sites must be within the setting of this notable structure.</p> <p>This SA objective score for Site 59842 should therefore be amended to “Neutral” (0)</p> <p>• SA Objective 8</p> <p>There is a discrepancy within this objective between the assessment for Site 59842 and that for Site 59647 compared with those for Sites 59635 and 59686.</p> <p>Both sites 59842 and 59647 retain the same wording: “The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.”</p> <p>Nonetheless, Site 59842 is assessed as “Significant Negative” (--) while Site 59647 is assessed as “Neutral” (0). As this same “Neutral” (0) categorisation has been applied to Site 59635</p>	

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		<p>and Site 59686 but those sites are in Flood Zones 1 and 2 respectively, the assessments for both Sites 59842 and 59647 are incorrect, and should be "Minor Negative" (-).</p> <p>In the case Site 59842, it is clear from efforts deriving from the promotion to TMBC that the watercourse running through the site does not represent a significant constraint to delivery, and would not preclude allocation.</p> <p>This SA objective score for Site 59842 should therefore be amended to "Minor Negative" (-).</p> <ul style="list-style-type: none"> • SA Objective 9 <p>This objective has been misapplied in relation to Site 59842. The site has been assessed as "Uncertain Significant Negative" (--?) as it is greenfield land and contains a significant proportion (>=25%) of Grade 3 agricultural land.</p> <p>However, this same categorisation has been applied to Sites 59647, 59635 and Site 59686, yet all these include higher grade agricultural land (Grade 1 & 2). It is unreasonable for the assessment to 59842 to be more onerous in this regard, and this SA objective score for Site 59842 should be amended to "Minor Negative" (-).</p> <p>We therefore consider that the corrected SA for the entire 59842 site should be amended as follows:</p> <p>*image*</p> <p>In conclusion, the clear inconsistencies within the SA identified above should be addressed"</p>	
42807617	Annex 1	<p>"[59714]</p> <p>Comments made on Appendix 1 of SA</p> <p>Please see R1694."</p>	<p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). Therefore, the minor negative effect it receives in relation to SA objective 2 is correct.</p> <p>The site's proximity to healthcare facilities and open space is considered separately under SA objective 1: health and wellbeing. The site receives a significant positive effect against this objective, as it is within 800m of an existing healthcare facility, open space and walking paths. In the next iteration of the SA Report, this will be amended as the healthcare facility the site was recorded as being within 800m of</p>

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			<p>no longer exists. Therefore, in the next iteration of the SA Report, the site will receive a minor positive effect against SA objective 1.</p> <p>The site's proximity to schools is considered separately under SA objective 3: education whereby the site receives a minor positive effect as it is within 800m of a primary school (West Malling Church of England Primary School). All effects against this objective are uncertain, as school capacity is unknown.</p> <p>The site's proximity to public transport is considered separately under SA objective 10: climate change mitigation whereby the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59714 receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is located on the edge of a settlement and so development may be more easily integrated into existing built development. All adverse effects against this objective are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Consideration cannot be given to the Landscape Appraisal submitted by the site promoter, as all sites must be appraised on a consistent basis and information like this is not available for other sites. The same applies in relation to SA objective 7: heritage and the Heritage Statement submitted by the promoter.</p> <p>Site 59714 contains green infrastructure assets in the form of trees and thick vegetation, which could be lost as a result of development. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value". The site also receives a significant negative effect due to the fact it is adjacent to a Local Wildlife Site (St Mary's Churchyard, West Malling).</p> <p>As noted by the respondent, site 59714 contains a small area of land with a 1 in 30 year risk of surface water flooding. As SA utilises a precautionary approach, the significant negative effect is correct. The effect is recorded as uncertain, as the effects of new development on this objective will depend to some extent on its design and whether it incorporates Sustainable Drainage Systems (SuDS). Although the respondent makes reference to SuDS, this is a 'policy-off' appraisal and so mitigation is not taken into consideration.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively being used for agricultural purposes.</p>

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42807617	Annex 1	<p>"[59808]</p> <p>Comments made on Appendix 1 of SA with Questionnaire.</p> <p>Please see R1694"</p>	<p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). Therefore, the minor negative effect it receives in relation to SA objective 2 is correct.</p> <p>The site's proximity to healthcare facilities and open space is considered separately under SA objective 1: health and wellbeing. The site receives a significant positive effect against this objective, as it is within 800m of an existing healthcare facility, open space and walking paths.</p> <p>The site's proximity to schools is considered separately under SA objective 3: education whereby the site receives a minor positive effect as it is within 800m of at least one primary school (Stocks Green Primary School and Hildenborough Church of England Primary School). All effects against this objective are uncertain, as school capacity is unknown.</p> <p>The site's proximity to public transport is considered separately under SA objective 10: climate change mitigation whereby the site receives a minor positive effect as although it is more than 800m from a railway station, it is within 400m of a bus stop.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59808 receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is located on the edge of a settlement and so development may be more easily integrated into existing built development. All adverse effects against this objective are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Consideration cannot be given to the Landscape, Visual and Green Belt Technical Note submitted by the site promoter, as all sites must be appraised on a consistent basis and information like this is not available for other sites. The same applies in relation to SA objective 7: heritage and the Archaeological Statement and Built Heritage Statement submitted by the promoter.</p> <p>Site 59808 receives an uncertain significant negative effect in relation to SA objective 8: water, as it contains a waterbody and land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact the water body could be vulnerable to pollution during construction, and is also dependent on construction techniques used and Sustainable Drainage Systems (SuDS). Although the respondent makes reference to SuDS, this is a 'policy-off' appraisal and so mitigation is not taken into consideration. The site does not fall within a Source Protection Zone.</p> <p>Site 59808 contains green infrastructure assets in the form of trees and thick vegetation, which could be lost as a result of development. In the next iteration of the SA Report, the following sentence will be</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value". The site also receives a significant negative effect due to the fact it is adjacent to an Ancient Woodland and within 250m of other areas of Ancient Woodland.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively being used for agricultural purposes.</p>
44546305	Annex 1	<p>"[59874]</p> <p>Interim Sustainability Appraisal Report [comments]</p> <p>Kitewood's site to the west of Hays Road in Snodland is identified as site no. 59874 in the list of sites at Table 9 of the Tonbridge and Malling Borough Local Plan Regulation 18 Draft.</p> <p>The site is accessible by car, being located close to the junction of Hays Road and Malling Road. It is also accessible by public transport (by bus, by train) and by pedestrians and cyclists.</p> <p>The site is close to existing employment opportunities and also lies adjacent to residential uses on the opposite side of Hays Road.</p> <p>www.carneysweeney.co.uk</p> <p>The new occupiers of development on the site would benefit from existing social infrastructure and services in Snodland. Contributions are also able to be made to expand any of this infrastructure, as appropriate.</p> <p>The site study document that is submitted with this response to the Regulation 18 consultation shows the physical features on and immediately adjoining the site. From this, it is clear that development can be provided on the site outside Flood Zone 3 (which is to the south), without impact on the AONB (the site is well screened from the wider landscape) and can provide biodiversity improvements on the undeveloped areas of and boundaries to the site.</p> <p>The site is no longer farmed and no important agricultural land would be lost upon the site's development. The site is currently used for grazing horses and is therefore likely to have low ecological value.</p> <p>If the site contains a viable quantity of minerals, these could be extracted as part of the development process, and therefore is not a reason for the site being left undeveloped or to restrict its allocation.</p>	<p>Site 59874 has been appraised in line with the site assessment criteria, as outlined in Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The site has been appraised on a 'policy-off' basis and so consideration is not given mitigation (e.g. financial contributions). Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Indeed, extraction prior to development is acceptable within the Council's previously adopted Policy DM5 on mineral resources.</p> <p>The site can provide a range of housing types, mix and tenures together with employment use, in order to deliver a truly inclusive mixed development.</p> <p>The fact that the site can deliver both employment and housing development is also an important sustainability factor, that should be taken account to in the sustainability appraisal.</p> <p>As a result of the above, Kitewood's site at Snodland performs very well from a sustainability perspective."</p>	
44634145	Annex 1	<p>"[Reference to Site 59608 - Ismays Road]</p> <p>Representation to the Tonbridge and Malling Borough Council (TMBC) Regulation 18 Local Plan and Interim Sustainability Appraisal</p> <p>Please find below our representation to the TMBC Regulation 18 Local Plan consultation. This representation objects to the proposed allocation of Land to east of Ismays Road, Ivy Hatch (Site 59608) for residential development.</p> <p>Context</p> <p>The National Planning Policy Framework (NPPF) provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three interdependent objectives that need to be pursued in mutually supportive ways:</p> <p>an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and</p>	<p>Chapter 4 of the Interim SA Report provides an appraisal of Spatial Options.</p> <p>Site 59608 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>future needs and support communities' health, social and cultural well-being; and</p> <p>an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability</p>	<p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of this Site would not represent sustainable development through actively reducing health inequalities, improving access to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p> <p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p> <p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nursery grounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need.</p> <p>Conclusion</p> <p>The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to.</p> <p>The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change.</p> <p>In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>We consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In our view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and we request that the Site is not allocated in the emerging Local Plan.</p> <p>National Planning Policy Framework (publishing.service.gov.uk) (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf)</p> <p>Tonbridge and Malling Local Plan (tmhc.gov.uk) (https://www.tmhc.gov.uk/downloads/file/2219/interim-sustainability-appraisal-report)</p> <p>The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf (kentdowns.org.uk) (https://kentdowns.org.uk/wp-content/uploads/2021/11/The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf)"</p>	
44459553	Annex 1	<p>"Land at Maidstone Road, Hadlow, comprising three parcels: Sites [59637], [59638] and [59637] - [SEE 'COPIES FOR LUC' FOLDER]</p> <p>As an overall approach, there are concerns that the ISA has not assessed the site in sufficiently granular detail, but rather has looked at matters at too broad a level. A number of the areas of disagreement below would be addressed through a more detailed review. Moreover, as set out in the PPG it is a requirement of the SA process that "measures envisaged to prevent, reduce and, as fully as possible, offset" any impacts are considered. The SA has not, at this point, undertaken this and must do to inform the Reg 19 LP. Fernham Homes welcomes the opportunity to discuss with TMBC Members and Offices the mitigation measures that would be incorporated into any scheme to inform this (necessary) judgement.</p> <p>At present it is very difficult to ascertain the relationship between the individual sites which have been considered. Fernham Homes has previously requested that TMBC publish an (interactive) map showing</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Site 59637 is incorrectly recorded as containing a green infrastructure asset, as it overlaps a green infrastructure asset. This is as a result of the GIS analysis. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to SA objective 5: biodiversity and geodiversity, as it is within 1km of Ancient Woodland. Site 59638 is expected to have an uncertain significant negative effect against SA5, as it contains a green infrastructure asset. These are 'policy-off' appraisals and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to SA objective 6: landscape and townscape, site 59638 is incorrectly recorded as not located near any settlements in a rural location, when it is in fact on the edge of a settlement. This is due to</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the location of the sites relative to one another. Fernham Homes wishes to reiterate this request.</p> <p>Need for SA of single site</p> <p>As detailed in the Introduction to this representation, it is of fundamental importance that the single site (comprising the combined parcels 59637, 59638 and 59637) is SA'd as a single site. It should also be considered in the HELAA as a single site.</p> <p>Comments on assessments of individual parcels</p> <p>The “uncertain significant negative” for parcels 59637 and 59638 against ISA Objective 5 “to protect and enhance biodiversity and geodiversity” is not understood. The commentary states that the site contains an “existing green infrastructure asset that could be lost as a result of new development”. The site is open field at present. Its redevelopment for housing will realise the delivery of biodiversity net gain (BNG) – i.e. betterment. At most the site should be scored as “uncertain minor negative”, if not negligible.</p> <p>Similarly, in relation to ISA Objective 6 “to protect and enhance the borough’s landscape and townscape character and quality” for 59637 and 59638 is not agreed with. These parcels are located adjacent to the settlement of Hadlow or in very close proximity to it, and are well screened by existing vegetated boundaries. Again – this would be apparent from a detailed assessment of the site. Fernham Homes consider that these should be assessed as “uncertain minor negative”.</p> <p>ISA Objective 8 “to protect and enhance the quality of water features and resources” is appraised as “significant negative/negligible” for 59637 and 59638 These are unsound appraisals, and again reflects the fact that the parcels have not been assessed in sufficient detail. The single site (i.e. all three parcels) is entirely in Flood Zone 1, as documented by the current Environment Agency (EA) mapping. The strategic flood risk assessment (SFRA) has not yet been completed and accordingly there is no publicly available information on surface water flooding. Accordingly at this time and until the production of the SFRA these assessments (including for parcel 59686) should be amended to be solely negligible.</p> <p>ISA Objective 9 relates to “conserve and enhance soil resources and guard against land contamination”. Whilst the land may be Grade 3, it is divorced from any wider holding and its loss will not have a significant impact on usable soil resources that will have a material impact on agricultural operations. Therefore, Fernham Homes considers that it should be appraised as “uncertain minor negative” for all three parcels.</p>	<p>the fact the GIS analysis identified no percentage overlap between the site and settlement boundary. In the next iteration of the SA Report, this site will receive an uncertain minor negative effect in relation to SA6. Site 59637 is correctly recorded as being located outside of a settlement, because although it is close to the settlement, it does not border it as site 59638 does.</p> <p>With regard to SA objective 8: water, the proforma for each site states "The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added]. Sites 59637 and 59638 both receive significant negative effects as they contain land with a 1 in 30 year risk of surface water flooding. This information is available from the Environment Agency. Site 50637 also receives a negligible effect in relation to this objective, as it does not contain a water body or watercourse, or fall within a Source Protection Zone. Site 59638, on the other hand, does contain a water body.</p> <p>The sites receive significant negative effects in relation to SA objective 9: soil, as they comprise greenfield land and contain a significant proportion of Grade 1 and/or 2 agricultural land. This is in accordance with the site assessment criteria.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		In short, it is essential that sites are properly appraised on a detailed and qualitative basis to ensure that decisions are made on credible information. Future appraisal – including that of Land at Maidstone Road, Hadlow as a single site - needs to take into account mitigations. At present it appears that the ISA assessments have been made on the basis of a high level and formulaic basis, and are missing key human judgement."	
44459553	Annex 1	<p>"Land at Goldings Yard, Stocks Green Road, Hilden Park: Site [59615] [SEE 'COPIES FOR LUC' FOLDER]</p> <p>As an overall approach, there are concerns that the ISA has not assessed the site in sufficiently granular detail, but rather has looked at matters at too broad a level. A number of the areas of disagreement below would be addressed through a more detailed review.</p> <p>Moreover, as set out in the PPG it is a requirement of the SA process that “measures envisaged to prevent, reduce and, as fully as possible, offset” any impacts are considered.</p> <p>The SA has not, at this point, undertaken this and must do to inform the Reg 19 LP. Fernham Homes welcomes the opportunity to discuss with TMBC Members and Offices the mitigation measures that would be incorporated into any scheme to inform this (necessary) judgement.</p> <p>At present it is very difficult to ascertain the relationship between the individual sites which have been considered. Fernham Homes has previously requested that TMBC publish an (interactive) map showing the location of the sites relative to one another. Fernham Homes wishes to reiterate this request.</p> <p>The “uncertain significant negative” against ISA Objective 5 “to protect and enhance biodiversity and geodiversity” is not understood. The commentary states that the site contains an “existing green infrastructure asset that could be lost as a result of new development”. The site is a field used for grazing livestock/horses. It is accordingly of relatively low ecological value at present, and its redevelopment for housing will realise the delivery of biodiversity net gain (BNG) – i.e. betterment. At most the site should be scored as “uncertain minor negative”, if not negligible.</p> <p>Similarly, in relation to ISA Objective 6 “to protect and enhance the borough’s landscape and townscape character and quality” is not agreed with. The site is located near to settlements: Tonbridge (Hilden Park) and Hildenborough. Again – this would be apparent from a detailed assessment of the site. Indeed, the site adjacent (to the east –</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Site 59615 is incorrectly recorded as containing a green infrastructure asset, due to the fact it overlaps a green infrastructure asset to the south west. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect as it is within 1km of some areas of Ancient Woodland. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). If the site is allocated in the Local Plan via a policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59615 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is not adjacent or within a settlement.</p> <p>SA utilises a precautionary approach and therefore if a site is located within close proximity of a heritage asset (as recorded in the Kent Historic Environment Record), it has the potential to result in a significant negative effect. All effects against SA objective 7: heritage are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the proforma for site 59615 states "The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added]. Site 59615 receives a significant negative effect, as it contains land with a 1 in 30 year risk of surface water flooding. This is mixed with a negligible effect, as the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 9: soil, as it comprises greenfield land and contains a significant proportion of Grade 3 agricultural land. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).</p>

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		<p>TMBC reference 59692) was proposed to be allocated in the January 2019 LP. Fernham Homes consider that this should be assessed as “uncertain minor negative”.</p> <p>Whilst the position of the site relative to the Grade II Listed bridge on Stocks Green Road is noted, this does not justify an “uncertain significant negative” assessment. Rather, the bridge is located some 180m from the site at its closest, with two intervening dwellings – and accordingly the impact on setting will be (at most) limited. Land on the opposite side of Stocks Green Road has been identified as a historic park and garden by Kent County Council (KCC). It is not designated as such by Historic England, and accordingly has “no statutory relevance and provides no particular protection”. Therefore, Fernham Homes consider that ISA Objective 7 (to protect and enhance the cultural heritage resource” should be assessed as “uncertain minor negative” or “negligible”.</p> <p>ISA Objective 8 “to protect and enhance the quality of water features and resources” is appraised as “significant negative/negligible”. This is an unsound appraisal, and again reflects the fact that the site has not been assessed in sufficient detail. The site is entirely in Flood Zone 1, as documented by the Strategic Flood Risk Assessment (SFRA) (2016) which informed the January 2019 LP, and the current Environment Agency (EA) mapping. Appendix E of the SFRA indicates that a fraction of the site (in the north western corner) is subject to a single surface water flow. This will not affect the suitability of the site for development. Accordingly this assessment should be amended to be solely negligible.</p> <p>*image*</p> <p>Figure 1: extract from EA flood map for planning website</p> <p>*image*</p> <p>Figure 2: extract from Appendix E of TMBC Level 1 SFRA (2016) Surface Water Flood Risk</p> <p>ISA Objective 9 relates to “conserve and enhance soil resources and guard against land contamination”. Whilst the land may be Grade 3, it is divorced from any wider holding and its loss will not have a significant impact on usable soil resources that will have a material impact on agricultural operations. Therefore, Fernham Homes considers that it should be appraised as “uncertain minor negative”.</p>	

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		<p>In short, it is essential that sites are properly appraised on a detailed and qualitative basis to ensure that decisions are made on credible information. Future appraisal needs to take into account mitigations. At present it appears that the ISA assessments have been made on the basis of a high level and formulaic basis, and are missing key human judgement."</p>	
44514401	Annex 1	<p>"Site [59707] - Land south of Kemsing Road and West of Borough Green Road, Wrotham - [SEE 'COPIES TO LUC' FOLDER]</p> <p>In relation to Site 59707 (Land south of Kemsing Road and West of Borough Green Road, Wrotham), the appraisal considers there to be a minor negative score against SA Objective 2 (To improve equality and access to community facilities and services). However, the Site is well-connected to the shops and services in the village, as well as the Village Hall and recreation ground, which can be enhanced if required.</p> <p>In respect of encouraging sustainable economic growth and business development (SA Objective 4), Site 59707 (Land south of Kemsing Road and West of Borough Green Road, Wrotham), scores Negligible (0) / Negligible (0). The commentary states "the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". This development of this Site will inevitably support local business and bring investment to the area. Furthermore, whilst not long term, there is clearly significant employment creation through the construction phase of the development, which will have a benefit to the area.</p> <p>SA Objective 5 (to protect and enhance biodiversity and geodiversity) scores Site 59707 (Land south of Kemsing Road and West of Borough Green Road, Wrotham) uncertain minor negative (-?); however concludes that appropriate mitigation may even result in beneficial effects. To this end, it is considered at worst there should be a minor positive score, as the development proposal would be required to deliver a net gain through the Environment Act 2021.</p> <p>Similarly SA Objectives 6 and 7 (landscape and townscape character and quality / protect and enhance the cultural heritage resource) score Site 59707 (Land south of Kemsing Road and West of Borough Green Road, Wrotham) uncertain significant negative (--?). However, without knowledge of a layout or mitigation, it is considered a 'significant' score is speculative. A concept plan has been produced and provided with the recent Call for Sites submission, which should, in our view, ensures no harm to heritage assets or the landscape.</p>	<p>Site 59707 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. This is in accordance with the site assessment criteria.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities and therefore the SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, this is a 'policy-off' appraisal and so consideration is not given to mitigation. The site has therefore been correctly appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 6, site 59707 is incorrectly recorded as not located near any settlements in a rural location, when it is on the edge of a settlement. This is due to the fact the GIS analysis identified no percentage overlap with the settlement boundaries. The effect for site 59707 will not be upgraded, however, as it is within the AONB and so should continue to receive an uncertain significant negative effect.</p> <p>SA utilises a precautionary approach and therefore if a site is located within close proximity of a heritage asset (as recorded in the Kent Historic Environment Record), it has the potential to result in a significant negative effect. All effects against SA objective 7: heritage are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the proforma for site 59707 states "The site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added]. Site 59707 receives a significant negative effect, as it contains land with a 1 in 30 year risk of surface water flooding. This is mixed with a negligible effect, as the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>Support noted with regards to SA objective 14: housing and the significant positive effect.</p>

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		<p>SA Objective 8 (Water features and resources) claims Site 59707 (Land south of Kemsing Road and West of Borough Green Road, Wrotham) is either entirely or significantly within Flood Zone 3 and or/within an area with a 1 in 30 year risk of surface water flooding and therefore scores Significant negative (--) / Negligible (0) . However, this is incorrect. As shown in the images below, taken from the Flood Map for Planning from the Environment Agency, the Site is not in any flood zone and only partially within an area at medium risk of surface water flooding.</p> <p>*image*</p> <p>*image*</p> <p>We support the significant positive score (++) in respect of SA Objective 14 (to provide a suitable supply of high quality housing) noting that the development of the Site would make a material contribution towards meeting local housing needs in a logical and sustainable rural location."</p>	
42271969	Annex 1	<p>"Site [59669] - Land South of Noble Tree Road - [SEE 'COPIES TO LUC' FOLDER]</p> <p>Consistent with our previous comments, it is somewhat concerning that the consultation is not accompanied by a HELAA, given that the next consultation will concern a Regulation 19 Pre-Submission Draft Local Plan. The Interim SA (at Annex 1) does present an initial summary of the promoted development sites, with Land South of Noble Tree Road being identified with reference 59669, at pages 448 to 450 of the Interim SA.</p> <p>However, the SA does not appear to have been informed by the evidence submitted via the Call for Sites process. In some instances (as explained overleaf), this has undermined the robustness of the assessment in some areas. Indeed, this is apparent from the prevalence of 'uncertain' scores.</p> <p>Overleaf, we present our assessment of the site-specific analysis for Site Ref. 59669. Where the level of constraint has been overstated or misunderstood in the Interim SA, a revised score is presented as appropriate.</p> <p>*image*</p>	<p>Site 59669 is incorrectly recorded as containing an open space and so receives an uncertain significant negative effect (as part of a mixed effect) against SA objective 1: health and wellbeing. This is due to the fact the site overlaps an existing open space and therefore the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the site will receive a minor positive effect only in relation to this objective.</p> <p>With regard to SA objective 2: services and facilities, the site receives a significant negative effect, as it falls within the Poor Accessibility Band in the Urban Capacity Study (July 2022). Therefore, it correctly receives a significant negative effect which is in accordance with the site assessment criteria outlined in Appendix D of the Interim SA Report.</p> <p>With regard to SA objective 3: education, all sites that are recorded as falling within close proximity of a school receive uncertainty, as school capacity is unknown. Site 59669 receives an uncertain minor positive effect as it is within 800m of Hildenborough Church of England Primary School but there is uncertainty as the effect will depend on there being capacity at the school to accommodate new pupils.</p> <p>Although the respondent states that there is potential to include a care home within the proposal, this is a 'policy-off' appraisal and so consideration is not given to additional information such as this – particularly as it would mean the sites had not all been appraised on a consistent basis. There is also no guarantee that a care home would be provided.</p>

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		<p>*image*</p> <p>*image*</p> <p>*image*"</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, the site contains an area of Ancient Woodland, in addition to being within 250m of other areas of Ancient Woodland. This is a 'policy-off' appraisal and so consideration is not given to mitigation as the respondent has suggested. If the site were to be allocated in the Local Plan via policy containing mitigation measures, it would be appraised on a 'policy-on' basis.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect as it is not located near any settlements. If it were located on the edge of a settlement, it could be more easily integrated into existing built development. It would not result in the loss of designated open space.</p> <p>With regard to SA objective 7: heritage, the SA does not utilise independent historic appraisals that have been undertaken and submitted by site promoters, as this would mean that the sites are not appraised on a consistent basis. The site receives an uncertain significant negative effect as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. As stated in the proforma "The site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding" [emphasis added].</p> <p>With regard to SA objective 9: soil, the site has been appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 13: material assets and waste, the respondent has stated that mineral extraction may be viable prior to residential development, subject to further assessment. The uncertain minor negative effect the site receives in relation to this objective is correct, as the SA acknowledges that for sites within Minerals Safeguarding Areas, it is unknown whether sites would offer viable opportunities for minerals extraction or not.</p> <p>Support noted with regards to SA objectives 10: climate change mitigation, 11: climate change adaptation and 12: housing.</p>

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42687457	Annex 1	<p>"I am writing to OBJECT most strongly to the proposal to build on the site at Darkhill Farm plan number 59709</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Good Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites 59770, 59871 and 59720 have been appraised in line with the site assessment criteria. As these sites are not within 100m of an AQMA, they receive a negligible effect. Site 59709 is located within 100m of an AQMA and so receives a significant negative effect in relation to this objective.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may</p>

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		<p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. The proximity to these designated sites provides an indication of the potential for an adverse effect. The site also contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p>	<p>be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

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		<p>The site is within 100m of an AQMA. (Air Quality Management Area) so this objective could be measured, but the impact would not be known until the development had taken place and if adverse, could not be reversed.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p> <p>Plan number 59720 and 59871 Gracelands</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the Graceland's Sites 59720 and 59871</p>	

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		<p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>The proposal is for a total of 230 dwellings. On the assumption there would be on average 4 people per household, this would mean 1000 more patients for the surgery - an increase of approximately 7% which is completely unsustainable.</p> <p>Objective 2.</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon. There is absolutely no provision for the increased number of children at either Ightham or Borough Green primary schools. There is only one local secondary school and that too is already at capacity.</p> <p>Objective 4</p>	

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		<p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area as they are residential sites.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1, but falls partially within zones 2 and 3. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains a significant proportion of agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p>	

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		<p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>The proposals for the development of these two sites will provide 230 houses. Whilst the sites alone might therefore be classed as suitable for providing housing of a suitable mix of type and tenure, the local infrastructure of schools, roads, medical facilities and drainage are completely unable to support a development of this size.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLANS 59720 and 59871</p> <p>Plan number 59770</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Rectory Lane, Ightham.</p> <p>I am a resident.</p>	

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		<p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p>	

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		<p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p>	

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		<p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p> <p>"</p>	
42687745	Annex 1	<p>"Plan number 59608</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build in excess of 37 dwellings on Ismays Road, Ightham.</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis. Site 59608 received a mixed uncertain minor negative and negligible effect, as</p>

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		<p>year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Poor Accessibility Band. There are no public transport facilities within easy reach of this site</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this residential site will not directly influence sustainable economic growth or the delivery of employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p>	<p>although it is not within Flood Zones 2 or 3, it partially falls within Source Protection Zone 3.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites 59608, 59770, 59871 and 59720 have been appraised in line with the site assessment criteria. As these sites are not within 100m of an AQMA, they receive a negligible effect. Site 59709 is located within 100m of an AQMA and so receives a significant negative effect in relation to this objective.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Objective 8</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is called a brownfield site, but it is surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>The site will produce fewer than 100 dwellings. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>Ismays Road is very narrow. The impact on the environment of lorries and deliveries in such a confined space would be detrimental, even</p>	

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		<p>dangerous to the already eroding roadside edges and existing residential properties. The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>I object most strongly to PLAN 59608</p> <p>Plan number 59770</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Rectory Lane, Ightham.</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p>	

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		<p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p>	

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		<p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p>	

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		<p>Plan number 59720 and 59871 Gracelands</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the Graceland's Sites 59720 and 59871</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>The proposal is for a total of 230 dwellings. On the assumption there would be on average 4 people per household, this would mean 1000 more patients for the surgery - an increase of approximately 7% which is completely unsustainable.</p> <p>Objective 2.</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities,</p>	

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		<p>this cannot be relied upon. There is absolutely no provision for the increased number of children at either Ightham or Borough Green primary schools. There is only one local secondary school and that too is already at capacity.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area as they are residential sites.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1, but falls partially within zones 2 and 3. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains a significant proportion of agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p>	

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		<p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>The proposals for the development of these two sites will provide 230 houses. Whilst the sites alone might therefore be classed as suitable for providing housing of a suitable mix of type and tenure, the local infrastructure of schools, roads, medical facilities and drainage are completely unable to support a development of this size.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLANS 59720 and 59871</p> <p>"</p>	
44719265	Annex 1	"[59608]	Chapter 4 of the Interim SA Report provides an appraisal of Spatial Options.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>I'd like to register my objection to the allocation of ANY new houses on the proposed Ismays Road site at the nursery as part of the local plan.</p> <p>Please find the details of why this development is entirely inappropriate below.</p> <p>I would also like to add that I believe planning permission was only granted for the existing house on the grounds of the nursery built by Tom the owner, on the basis that it was necessary to have accommodation there for the business to be viable.</p> <p>Should houses be built the business would not be a going concern.</p> <p>It seems like a "creep creep" approach to building in an AONB, with pound signs in his eyes, making a packet and selling up, leaving the rest of us to deal with the unpleasantness of our semi-rural home becoming a mini housing estate.</p> <p>Regards,</p> <p>Laura Clout</p> <p>-----</p> <p>Representation to the Tonbridge and MallingBorough Council (TMBC) Regulation 18 Local Plan and Interim Sustainability Appraisal</p> <p>Please find below our representation to the TMBC Regulation 18 Local Plan consultation. This representation objects to the proposed allocation of Land to east of Ismays Road, Ivy Hatch (Site 59608) for residential development.</p> <p>Context</p> <p>The National Planning Policy Framework (NPPF)provides the overarching framework used for preparing Local Plans based on the Government's aims for the planning system, the purpose of which is to contribute to the achievement of sustainable development. It sets out in paragraph 8 that sustainable development has three</p>	<p>Site 59608 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration o the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing,</p>

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		<p>interdependent objectives that need to be pursued in mutually supportive ways:</p> <p>* a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;</p> <p>* b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and</p> <p>* c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.</p> <p>So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 states that for plan-making this means that all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.</p> <p>The Regulation 18 Local Plan sets out how the hierarchy of settlements should be used to guide decisions on where development should be focussed. It acknowledges that settlements at the top of the hierarchy (Urban Areas), are most likely to provide opportunities for sustainable development because they contain a variety of services, are well connected by public transport and offer opportunities for active travel. They also contain opportunities for making use of previously developed land. Beyond the Urban Areas are Rural Service Centres and Other Rural Settlements. At the bottom of the hierarchy are Rural Areas within the open countryside and where development should be restricted.</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social,</p>	<p>as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW)that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of thisSite would not represent sustainable development through actively reducing health inequalities, improvingaccess to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p> <p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor</p>	

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		<p>would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRow and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p> <p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p> <p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p>	

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		<p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nurserygrounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physicalinfrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p>	

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		<p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p> <p>In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need.</p> <p>Conclusion</p> <p>The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to.</p>	

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		<p>The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change.</p> <p>In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>We consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In our view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and we request that the Site is not allocated in the emerging Local Plan."</p>	
42821345	Annex 1	Site [59830] - Borough Green Gardens - [SEE "COPIES FOR LUC" FOLDER]	<p>With regard to the SA framework, the respondent has referred to the sub-objective "To promote the use of more sustainable modes of transport" as incorrectly being located under SA objective 11: climate change adaptation when it should be under SA objective 10: climate change mitigation. However, it is under SA objective 10 in the Interim SA Report.</p> <p>The respondent has requested a map showing the proposed strategic options and reasonable alternative development site options. In the next iteration of the SA Report, a map showing the reasonable alternative development site options will be provided. Mapping tends to be provided by councils for different strategic options.</p> <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible or proportionate to explore the cumulative effects of the Plan.</p>

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			<p>There is a lot of crossover between the SA objectives but this is not something the SA is required to explore. The SA objectives (i.e. the SA framework) were established via the review of plans, policies and programmes (Appendix B) and the key sustainability issues (paragraphs 3.52 to 3.92) identified by the baseline review (Appendix C).</p> <p>The SA has provided an appraisal of all reasonable alternative options and will continue to do so.</p> <p>The respondent has provided a detailed table regarding the SA's compliance.</p> <ul style="list-style-type: none"> ■ It is not necessary for the SA to provide an infographic or table showing the timeline and key dates specific to the stages of the Local Plan and SA, rather it is the role of the Local Development Scheme to provide this information. ■ The quality of Figure 3.1 will be improved. ■ It would not be appropriate or proportionate to provide even further detail on existing policies, sustainability issues and mitigation within surrounding and neighbouring local authorities. Appendix B of the Interim SA Report provides enough detail on this currently. ■ You can view how we have addressed each comment on the SA Scoping Report in Appendix A of the Interim SA Report. It is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ With regard to the changing policy context, this is addressed under paragraphs 1.11 and 3.4 of the Interim SA Report. As there is a lot of uncertainty over these changes, further detail is not available. ■ It is not within the scope of the SA to explain how all international, national and sub-national plans and agendas will work holistically to achieve sustainable growth. ■ With regard to the baseline information, it is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ In Chapter 3 of the Interim SA Report the heading 'Likely Evolution of the Issue without the Local Plan' is used throughout, under each key sustainability issue identified. In line with the SEA Regulations, the SA correctly explores what will happen without the Local Plan. Further detail will be added to the sentence regarding the historic environment, in addition to references to vehicle technologies where relevant. ■ 'Do nothing' options result in negligible effects against all SA objectives, as they do not change the existing baseline. ■ A sub-objective regarding net zero has been added under SA objective 10: climate change mitigation. SA objective 10 explores

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			<p>climate change mitigation whereas SA objective 11 explores climate change adaptation. Climate change mitigation relates to the reduction of CO₂ emissions whereas climate change adaptation relates to adapting to the effects of climate change (e.g. extreme weather events).</p> <ul style="list-style-type: none"> ■ LUC was commissioned to undertake SA of the Local Plan, not HRA. The HRA is a separate, standalone document to the SA that will inform the SA at later stages in the plan-making process. ■ As mentioned already, the Interim SA Report does not contain a cumulative effects section due to the high-level nature of the Regulation 18 Local Plan. ■ The reasonable alternative development site options were appraised using the site assessment criteria outlined in Appendix D of the Interim SA Report, not the SA objectives and sub-objectives, which the policies are appraised against. ■ In the next iteration of the SA, consideration will be given to short, medium and long-term effects, and permanent and temporary effects. This will be in the cumulative effects section which as explained already, was not provided in the Interim SA Report as there were no policies and allocations to clearly identify the overall effects of the Plan, just options. ■ The site appraisals are 'policy-off' not 'policy-on', as consideration has not yet been given to mitigation. This ensures all sites are initially appraised on a consistent basis. If a site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis. <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible or proportionate to explore the cumulative effects of the Plan.</p> <p>It is important to note that the SA is one of many factors that feed into the plan-making process. The appraisals in Annex 1 of the Interim SA Report have been undertaken on a 'policy-off' basis, which means that the sites have been appraised on their physical constraints only. This ensures they are all appraised to a consistent level of detail. If sites are allocated in the Local Plan via policy that contains mitigation measures, the sites will be appraised on a 'policy-on' basis (i.e. taking into consideration mitigation).</p> <p>The respondent has provided their own appraisal of site 59830. As mentioned already, this is a 'policy-off' appraisal and so consideration is not given to mitigation at this stage.</p> <p>With regard to SA objective 1: health and wellbeing, site 59830 is incorrectly recorded as containing an open space and so receives an uncertain significant negative effect (as part of a mixed effect) against this objective. This is due to the fact the site overlaps an existing open space and therefore the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the site will</p>

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			<p>receive a significant positive effect only in relation to this objective. Air Quality Management Areas (AQMAs) are considered separately under SA objective 12: air quality.</p> <p>With regard to SA objective 2: services and facilities, this is a 'policy-off' appraisal and so consideration is not given to things like the provision of Local Centres and community infrastructure. The site receives a negligible effect, as it falls within the Good Accessibility Band in the Urban Capacity Study (July 2022). Therefore, it correctly receives a negligible effect which is in accordance with the site assessment criteria outlined in Appendix D of the Interim SA Report.</p> <p>The minor positive effect against SA objective 3: education is recorded as uncertain because the actual effect will also depend on whether there is capacity at nearby schools to accommodate new pupils.</p> <p>With regard to SA objective 4: economic growth, the site receives a significant positive effect because it is over 5ha and within 800m of a railway station. The effect is not recorded as uncertain as the respondent suggests.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59830 receives an uncertain significant negative effect as in addition to containing green infrastructure assets, it contains Ancient Woodland. In the next iteration of the SA Report, the proforma will clearly distinguish between internationally and nationally designated sites, and Ancient Woodland (Ancient Woodland is currently covered under international and national biodiversity and geodiversity sites).</p> <p>With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is on the edge of a settlement. However, it will still receive an uncertain significant negative effect in the next iteration of the SA Report, as it is within 500m of the AONB. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development.</p> <p>With regard to SA objective 7: heritage, the SA does not utilise independent historic appraisals that have been undertaken and submitted by site promoters, as this would mean that the sites are not appraised on a consistent basis. The site receives an uncertain significant negative effect as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, the site receives a significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding. The site is also located in Source Protection 3 but this is not the reason for its significant negative effect. Again this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively used for agriculture. Contamination is different to the Agricultural Land Classification. It is correct that the site receives an uncertain significant negative effect in relation to this objective.</p>

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			<p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. The SA correctly identifies the site as falling within 800m of a railway station.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, 59830 receives a negligible effect as it is not within 100m of an Air Quality Management Area (AQMA).</p> <p>With regard to SA objective 13: material assets and waste, the SA at this stage does not take into consideration mitigation and so even if the site will be extracted prior to development, the effect should remain as it is. This is because information like this may not be available for other sites and so they would not all be appraised on a consistent basis.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p>
44819617	Annex 1	Site [59822] - [COPY OF REPRESENTATION IN "COPIES TO LUC" FOLDER]	<p>With regard to the SA framework, the respondent has referred to the sub-objective "To promote the use of more sustainable modes of transport" as incorrectly being located under SA objective 11: climate change adaptation when it should be under SA objective 10: climate change mitigation. However, it is under SA objective 10 in the Interim SA Report.</p> <p>The respondent has requested a map showing the proposed strategic options and reasonable alternative development site options. In the next iteration of the SA Report, a map showing the reasonable alternative development site options will be provided. Mapping tends to be provided by councils for different strategic options.</p> <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible or proportionate to explore the cumulative effects of the Plan.</p> <p>There is a lot of crossover between the SA objectives but this is not something the SA is required to explore. The SA objectives (i.e. the SA framework) were established via the review of plans, policies and</p>

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			<p>programmes (Appendix B) and the key sustainability issues (paragraphs 3.52 to 3.92) identified by the baseline review (Appendix C).</p> <p>The SA has provided an appraisal of all reasonable alternative options and will continue to do so.</p> <p>The respondent has provided a detailed table regarding the SA's compliance.</p> <ul style="list-style-type: none"> ■ It is not necessary for the SA to provide an infographic or table showing the timeline and key dates specific to the stages of the Local Plan and SA, rather it is the role of the Local Development Scheme to provide this information. ■ The quality of Figure 3.1 will be improved. ■ It would not be appropriate or proportionate to provide even further detail on existing policies, sustainability issues and mitigation within surrounding and neighbouring local authorities. Appendix B of the Interim SA Report provides enough detail on this currently. ■ You can view how we have addressed each comment on the SA Scoping Report in Appendix A of the Interim SA Report. It is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ With regard to the changing policy context, this is addressed under paragraphs 1.11 and 3.4 of the Interim SA Report. As there is a lot of uncertainty over these changes, further detail is not available. ■ It is not within the scope of the SA to explain how all international, national and sub-national plans and agendas will work holistically to achieve sustainable growth. ■ With regard to the baseline information, it is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ In Chapter 3 of the Interim SA Report the heading 'Likely Evolution of the Issue without the Local Plan' is used throughout, under each key sustainability issue identified. In line with the SEA Regulations, the SA correctly explores what will happen without the Local Plan. Further detail will be added to the sentence regarding the historic environment, in addition to references to vehicle technologies where relevant. ■ 'Do nothing' options result in negligible effects against all SA objectives, as they do not change the existing baseline. ■ A sub-objective regarding net zero has been added under SA objective 10: climate change mitigation. SA objective 10 explores climate change mitigation whereas SA objective 11 explores climate change adaptation. Climate change mitigation relates to the reduction of CO2 emissions whereas climate change

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			<p>adaptation relates to adapting to the effects of climate change (e.g. extreme weather events).</p> <ul style="list-style-type: none"> ■ LUC was commissioned to undertake SA of the Local Plan, not HRA. The HRA is a separate, standalone document to the SA that will inform the SA at later stages in the plan-making process. ■ As mentioned already, the Interim SA Report does not contain a cumulative effects section due to the high-level nature of the Regulation 18 Local Plan. ■ The reasonable alternative development site options were appraised using the site assessment criteria outlined in Appendix D of the Interim SA Report, not the SA objectives and sub-objectives, which the policies are appraised against. ■ In the next iteration of the SA, consideration will be given to short, medium and long-term effects, and permanent and temporary effects. This will be in the cumulative effects section which as explained already, was not provided in the Interim SA Report as there were no policies and allocations to clearly identify the overall effects of the Plan, just options. ■ The site appraisals are 'policy-off' not 'policy-on', as consideration has not yet been given to mitigation. This ensures all sites are initially appraised on a consistent basis. If a site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis. <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible or proportionate to explore the cumulative effects of the Plan.</p> <p>It is important to note that the SA is one of many factors that feed into the plan-making process. The appraisals in Annex 1 of the Interim SA Report have been undertaken on a 'policy-off' basis, which means that the sites have been appraised on their physical constraints only. This ensures they are all appraised to a consistent level of detail. If sites are allocated in the Local Plan via policy that contains mitigation measures, the sites will be appraised on a 'policy-on' basis (i.e. taking into consideration mitigation).</p> <p>The respondent has provided their own appraisal of site 59822. As mentioned already, this is a 'policy-off' appraisal and so consideration is not given to mitigation at this stage.</p> <p>With regard to SA objective 1: health and wellbeing, Air Quality Management Areas (AQMA) are considered separately under SA objective 12: air quality.</p> <p>With regard to SA objective 2: services and facilities, the site receives a minor negative effect, as it falls within the Fair Accessibility Band in the Urban Capacity Study (July 2022). Therefore, it correctly receives a minor negative effect which is in accordance with the site assessment criteria outlined in Appendix D of the Interim SA Report.</p>

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			<p>The minor positive effect against SA objective 3: education is recorded as uncertain because the actual effect will also depend on whether there is capacity at nearby schools to accommodate new pupils.</p> <p>With regard to SA objective 4: economic growth, the site receives a minor positive effect instead of a significant positive effect because it is smaller than 5ha. This is in accordance with the site assessment criteria, which distinguishes between smaller and larger employment and mixed-use sites.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59822 receives an uncertain significant negative effect as in addition to containing green infrastructure assets (thick trees and vegetation), it is within 250m of some areas of Ancient Woodland. In the next iteration of the SA Report, the proforma will clearly distinguish between internationally and nationally designated sites, and Ancient Woodland (Ancient Woodland is currently covered under international and national biodiversity and geodiversity sites).</p> <p>With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is on the edge of a settlement. In the next iteration of the SA, the site will receive an uncertain minor negative effect against this objective.</p> <p>With regard to SA objective 7: heritage, the SA does not utilise independent historic appraisals that have been undertaken and submitted by site promoters, as this would mean that the sites are not appraised on a consistent basis. The site receives an uncertain significant negative effect as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, the site receives a significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding. The site is also located in Source Protection 3 but this is not the reason for its significant negative effect. Again this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively used for agriculture. Contamination is different to the Agricultural Land Classification. It is correct that the site receives an uncertain significant negative effect in relation to this objective.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. The SA correctly identifies the site as falling within 400m of a bus stop but not 800m of a railway station.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of</p>

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			<p>development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, 59822 receives a negligible effect as it is not within 100m of an Air Quality Management Area (AQMA).</p> <p>With regard to SA objective 13: material assets and waste, the SA at this stage does not take into consideration mitigation and so even if the site will be extracted prior to development, the effect should remain as it is. This is because information like this may not be available for other sites and so they would not all be appraised on a consistent basis.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p>
42716737	Annex 1	<p>"Comments on proposed Hadlow sites</p> <p>59601 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 8: To protect and enhance the quality of water features and resources Negligible (0) Should be uncertain minor negative (-?). The site, along with other sites north of the A26, helps absorb flood water at times of run-off from the fields down from West Peckham parish. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+) Should be minor negative (-). There is no footpath or cycle path linking to Hadlow village and the A26 is a fast road and dangerous for pedestrians at that point. The likelihood of any residents using any form of transport other than private car is negligible. And due to the lack of parking space in the village, residents of any developments on this site would be more likely to use shops further afield with consequent increase in car use.</p> <p>59637 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Significant positive (++)/Uncertain significant negative (--?) Disagree with the possible rating of (++) Should be negligible (0)/Uncertain significant negative (--?) Any development on the site would have a negative effect for existing users of the footpath on their enjoyment of the countryside. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?) Should be significant negative (--). The site is Green Belt with a well-used footpath running across it. For visitors to the Cemetery next to the site, it would adversely impact cherished views across the existing</p>	<p>Site 59601 is recorded as having an uncertain significant negative effect in relation to SA objective 8: water, not a negligible effect. The SA acknowledges in the proforma for the site that it is within Flood Zone 3 and contains land with a 1 in 30 year risk of surface water flooding. A watercourse also runs along the western edge of the site.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>Site 59637 receives a significant positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an existing healthcare facility, open space and walking path. With regard to SA objective 6: landscape and townscape, the site is already recorded as having a significant negative effect in relation to this objective. All effects are recorded as uncertain against this objective, as the actual effects will depend on the design, scale and layout of development, which will be determined at planning application stage.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain, as the actual effects will depend</p>

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		<p>countryside to the Grade II listed Hadlow Tower. SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--?). Should be significant negative (--), the site affects the setting of the cemetery next to it, with its Grade II listed war memorial. SA Objective 8: To protect and enhance the quality of water features and resources. Significant negative (-)/Negligible (0). Should be just Significant negative (-). The site is prone to flooding and run-off from any development could affect the health of the nearby pond. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor positive (+). Should be minor negative (-). There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59638 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being Significant positive (++) The junction of the access road with the A26 is dangerous due to visibility and the speed of traffic using the A26. SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain significant negative (-?) Should be significant negative (--): the location of the site next to the pond would impact the quality of the water in the pond and the wildlife that use it. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?) Should be significant negative (--): The site is Green Belt. Any development would adversely impact the rural setting of the pond, currently with trees and field behind it. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+) Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59647 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Significant positive (++). Should be Uncertain minor positive (+?): the Hadlow medical centre is over-subscribed with no room for expansion. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative (-?) Should be significant negative (--): The site is Green Belt. Traffic from any development of that size would cause unacceptable congestion on Court Lane and at the narrow junction with the A26. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor positive (+) Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59659 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Significant positive (++). Should be Uncertain minor positive (+?): the Hadlow medical centre is over-</p>	<p>on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59637 receives a significant negative effect in relation to SA objective 8: water as it contains land with a 1 in 30 year risk of surface water flooding. The significant negative effect is mixed with a negligible effect, so as to acknowledge the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>SA objective 1: health and wellbeing looks at accessibility to healthcare facilities and things like open space, not the impacts of traffic congestion and dangerous roads and junctions. The significant positive effects sites 59638, 59776 and 59853 are expected to have in relation to SA objective 1: health and wellbeing, and the minor positive effects sites 59811, 59747, 59806 and 59846 are expected to have are correct and in line with the site assessment criteria. The location of site 59638 near a pond is addressed separately under SA objective 8: water. The SA acknowledges that the site contains a water body and so receives an uncertain significant negative effect in relation to this objective, as the water body could be vulnerable to pollution as a result of development. As mentioned already, SA objective 10: climate change mitigation looks at access to public transport but we note that climate change mitigation is dependent on numerous factors</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>As mentioned already, Green Belt is a policy designation and not an environmental or sustainability designation and so consideration is not given to the Green Belt in SA.</p> <p>With regard to SA objective 9: soil and site 59853, TMBC informed LUC that this site comprises brownfield land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>subscribed with no room for expansion. The junction of the proposed access road with the A26 is dangerous. SA Objective 2: To improve equality and access to community facilities and services SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative (-?) Should be minor negative (-) The site is Green Belt. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+) Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59686 Same site as 59659 above Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Significant positive (++). Should be Uncertain minor positive (+?): the Hadlow medical centre is over-subscribed with no room for expansion. The junction of the proposed access road with the A26 is dangerous. SA Objective 2: To improve equality and access to community facilities and services SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain minor negative (-?) Should be minor negative (-) The site is Green Belt. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+) Should be minor negative (-): There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59776 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being Significant positive (++)/Uncertain significant negative (--?) Should be significant negative (--): Carpenters Lane is unsuitable for the amount of traffic that would be generated by the development: this would impact the well-being of local residents. The junction with the A26 would be dangerous with the increased traffic turning on to the main road. The local medical centre is over-subscribed with no room for expansion. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--?). Should be significant negative (--). The site is Green Belt. Any development would adversely impact the setting of Williams Field, the main open space in the village. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-). Should be significant negative. Minor negative(-)/significant negative (--) depending on the exit points from the development. There is no infrastructure to allow safe cycling around Hadlow and between the village and Tonbridge.</p> <p>59811 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Minor positive (+). Should be</p>	<p>With regard to SA objective 10: climate change mitigation, sites 59811, 59747, 59806 and 59846 are correctly recorded as not being within close proximity of a railway station or bus stop and so in line with the site assessment criteria, receive minor negative effects in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>significant negative (--) due to the adverse effect on the well-being of Hadlow residents from a large amount of increased traffic. Hadlow is the nearest large village and is where much of the traffic from the site would access the A.26. This would most likely lead to much-increased congestion in Carpenters Lane and at the junction with the A26 which already sees queues of traffic exiting onto the main road. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--) Should be Significant negative (--). The site is Green Belt. It forms part of the parkland of historic Oxenhoath estate and is crossed with footpaths affording sweeping views across the countryside to the Grade II listed Hadlow Tower and beyond. SA Objective 7: To protect and enhance the cultural heritage resource. Uncertain significant negative (--?). Should be Significant negative (--). The site almost completely surrounds the historic grade II listed Oxenhoath and its gardens and parkland. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-). Should be significant negative (--). No nearby public transport and no cycle paths to allow safe cycling means that all road journeys will be by car.</p> <p>59853 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being Significant positive (++). Should be Uncertain significant negative (--?): The increase in traffic from the site and the congestion caused would have an adverse effect on the well-being of residents of Court Lane. Neither Court Lane nor Victoria Road are suitable to take a large amount of increased traffic. It would also cause congestion and long delays at the narrow junction with the A26. There is inadequate infrastructure to enable safe walking from the site to Hadlow to access village facilities, although a footpath could be added as part of a development. However, the distance from the village centre would lead many residents to use their cars rather than walk. There is no infrastructure to allow safe cycling around Hadlow and further to Tonbridge. Hadlow medical centre is over-subscribed with no room for expansion SA Objective 9: To conserve and enhance soil resources and guard against land contamination. Significant positive (++). Should be minor negative (-). Only about 50% of the site is brownfield. The rest is grass with some under agricultural cultivation. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change Minor positive (+). Should be minor negative: most of the site is more than 400m from a bus stop.</p> <p>Nearby sites</p> <p>59747 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Minor positive (+) Should be Significant negative (--): The size of the development would adversely impact the well-being of Hadlow residents as traffic from the development would increase congestion through the village centre.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>No medical facilities nearby; Hadlow Medical Centre is the nearest, but is fully subscribed with no room for expansion. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-) Should be significant negative (--). No nearby bus stop and no cycle paths to allow safe cycling means that all road journeys will be by car.</p> <p>59806 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Minor positive (+) Should be Significant negative (--): The huge scale of the development would adversely impact the well-being of Hadlow residents as traffic from the development would increase congestion through the village centre. No medical facilities nearby; Hadlow Medical Centre is the nearest, but is fully subscribed with no room for expansion, so there would need to be purpose-built medical facilities within the development. SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality. Uncertain significant negative (--?) Should be Significant negative (--): there would be a large loss of Green Belt, including woodland SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-) Should be significant negative (--). No nearby bus stop and no cycle paths along the A26 and A228 to allow safe cycling means that all road journeys will be by car.</p> <p>59846 Agree with TMBC's assessment of the effects of any prospective development on this site except for the following: SA Objective 1: To improve human health and well-being. Minor positive (+) Should be Significant negative (--): The size of the development would adversely impact the well-being of Hadlow residents as traffic from the development would increase congestion through the village centre. No medical facilities nearby; Hadlow Medical Centre is the nearest, but is fully subscribed with no room for expansion. SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change. Minor negative (-) Should be significant negative (--). No nearby bus stop and no cycle paths to allow safe cycling means that all road journeys will be by car. The following sites are between Tonbridge and the boundary of Hadlow parish and could reduce the "separation" of Hadlow from the larger urban area:"</p>	
42719937	Annex 1	<p>"[59432]</p> <p>SA Objective 1: to improve human health and well-being</p> <p>The local healthcare facility is oversaturated with patients which indicates that we are overwhelmed with residents in this area so building houses on this site would not improve human health and well-being. It would take away the beautiful green space that local</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA acknowledges that the site contains Willow Mead open space that could be lost as a result of development and so for this reason site 59432 receives an uncertain significant negative effect (as part of a mixed effect) in relation to this objective.</p> <p>With regard to SA objective 2: services and facilities, site 59432 is recorded in the Urban Capacity Study (July 2022) as falling within the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>children and families use which contribute to well-being. Other features such as a cycle path/play area/sports facility may be lost to a new development.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>This site is placed within a very good accessibility to community facilities and services, but our community is oversaturated, and a new development would result in more people needing to use the facilities.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and sectors of society.</p> <p>Although the proposed site is within 800m of an existing primary school, capacity is limited as it is one form entry. Therefore, levels of educational attainment and skills and training development for all age groups and sectors of society would not be improved.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>As TMBC states, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>The site is within 250m of one or more nationally designated biodiversity sites.</p>	<p>Very Good Accessibility Band and therefore receives a minor positive effect in relation to this objective. This objective does not consider the capacity of existing services and facilities.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59432 is recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Site 59432 is recorded as having an uncertain significant negative effect in relation to SA objective 6: landscape and townscape as it contains open space that could be lost as a result of development, although this is uncertain. All adverse effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>Site 59432 receives a minor negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding in addition to falling within Source Protection Zone 3.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Building houses here will not protect and enhance biodiversity and geodiversity. There is currently a project in progress on this green space where the County Council is finding ways to get trees to grow with the aim of maximizing benefits for people, wildlife, and the climate. This project is funded by Defra and running in partnership with Natural England, Tonbridge and Malling Borough Council and Medway Valley Countryside Partnership. If new houses were built within this area, they would block out natural light, cause extra pollution and noise which would not encourage wildlife and trees to grow or the project would have to be removed altogether to accommodate extra houses. There is wildlife that inhabits the field & surrounding habitats which would be lost.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>New buildings would result in the loss of a beautiful open space and no matter what the design and would not fit in with existing housing. Developing this site would not enhance the borough's landscape and townscape character and quality.</p> <p>SA Objective 7: To protect and enhance the cultural heritage</p> <p>New buildings, no matter what the design, would not fit in with existing 1980s housing. There would probably not be lines of sight between the development site and nearby heritage assets which your objective states 'is 250m-1km away'.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>As stated in TMBC's Objective 8, 'the site will be within Flood Zone 3 and in an/or within an area with a 1 to 30 risk of flooding'. There is a water inlet/outlet that leads to the lake opposite which will be right next to the site giving a higher potential for flooding.</p>	<p>services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59432 is not within 100m of an AQMA.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>As stated by TMBC 'The site is greenfield land and contains a significant proportion of grade 3 agricultural land'. If new houses are built how will the soil resources be conserved and enhanced, and the land be guarded against contamination?</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimize climate change.</p> <p>Greenhouse gas emissions will increase and not be reduced. Leybourne is situated between the A20 and M20 and air quality is questionable. Although there is a train station close by, people will still use their cars to commute to the station. People may drive to work locally or further afield as they are in easy reach of M20 and M26.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimize its impact</p> <p>As TMBC stated in Objective 11 'sustainable modes of transport' See comments in Objective 10 as linked to this.</p> <p>SA Objective 12:</p> <p>TMBC states that the site is not within 100m of an AQMA' even so, air quality will definitely decrease if more houses are built and more cars are used.</p> <p>SA Objective 13: To protect material assets and minimise waste.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>TMBC states that the site is within a 'Minerals Safeguarding Area' how will material assets and waste be minimised and protected if new houses are built?</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p> <p>As TMBC have quoted 'This site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer a wider mix of housing. This site will not provide as wider mix of housing or make as greater contribution towards housing needs as a larger site would'.</p> <p>We invite you to visit our home (bordering this site) to verify that these objections are valid.</p> <p>Therefore, we strongly request that Tonbridge & Malling Borough Council to reconsider the development of this site."</p>	
45000225	Annex 1	<p>"[59740]</p> <p>Dear Sir</p> <p>With reference to the consultation on Regulation 18 Local Plan I would like to make the following comments regarding Q8 Site 59740 outlined in the Tonbridge and Malling Local Plan, Interim Sustainability Appraisal Report, July 2022. In addition I would like to fully endorse and support the information compiled and submitted by the Broadwater Action Group in response to Regulation 18 Local Plan, Consultation Document, September 2022. I would also encourage TMBC to take into account the 1500 objections to the Berkeley Homes Planning Application 21/02719/OAEA related to this site.</p> <p>Sustainability Assessment (SA) Objectives</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)/Uncertain significant negative (--?)</p> <p>The suggested site has seen increased use by walkers, riders and cyclists since the Covid 19 pandemic. Local people and visitors have found solace in the natural habitat in this area. They are able to enjoy existing footpaths, bridleways and the agricultural landscape that is a</p>	<p>Site 59740 has been appraised in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 1: health and wellbeing looks at the proximity of sites to healthcare facilities and open space, in addition to walking and cycling paths, play areas and sports facilities. Site 59740 receives a minor positive effect in relation to SA objective 1: health and wellbeing, due to its proximity to open space and walking paths</p> <p>SA objective 2: services and facilities related to accessibility to amenities, rather than housing delivery. The site assessment criteria for SA objective 2 consider the accessibility band that each site has been placed within in the Urban Capacity Study (July 2022), as this provides an indication of the overall accessibility of a site in relation to access to services and site location. Site 59740 falls within the Fair Accessibility Band and therefore receives a minor negative effect in relation to SA objective 2.</p> <p>SA objective 3: education looks at the proximity of sites to primary and secondary state schools, so as to give an indication on whether education is easily accessible or not.</p> <p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59740 is 5ha or more, it receives a significant positive effect in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>particular feature of this area of Kent. The development of this site would contrive natural surroundings increasing pollution in all its forms thus negatively impacting the health and wellbeing of existing and future residents.</p> <p>There are already a number of sporting and fitness facilities and opportunities in the area that enhance health and fitness.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Minor negative (-)</p> <p>There is no evidence that the housing stock produced in the area in recent years has provided truly affordable housing for local residents. The cost of housing currently only provides for people who have a substantial deposit and monthly income to cover high mortgage costs. This is likely to be migrants from the more expensive London and Greater London conurbation.</p> <p>Data covering the ME19 area as of 12th July 2022 shows the following:</p> <p>'Average asking price: £516,433</p> <p>Average rental per week: £322'</p> <p>(https://property.xyz/uk/kent/west-malling)</p> <p>It is unlikely that access to community facilities would be improved if a greater concentration of housing was implemented on this site. There is already pressure on infrastructure in the area. I would draw attention to information provided to TMBC by BAG regarding the Berkeley Homes application 21/02719/OAEA Broadwater Farm and their research regarding the concentration of development in the locality:</p> <p>'... the increase in housing in the immediate vicinity of West Malling; that is within a 1 mile radius, the number of dwellings has increased by 3695. Tonbridge and Malling Borough Council covers a 93 square mile area, of which the area surrounding West Malling(including Kings Hill and Leybourne Grange) accounts for 1% of the geographical space of the borough. However, this very small area has absorbed roughly 58% of the number of new dwellings and the associated increase in</p>	<p>relation to this objective. The fact it is also within 800m of a train station also contributes to this significant positive effect. The Agricultural Land Classification is considered separately under SA objective 9: soil.</p> <p>Site 59740 is already recorded as having a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>SA objective 6 relates to the landscape and townscape, not the historic environment. The historic environment is dealt with separately under SA objective 7: heritage. Site 59740 receives a significant negative effect in relation to SA objective 7. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Flood risk is dealt with under SA objective 8: water, not SA objective 11: climate change mitigation. Site 59740 already receives an uncertain significant negative effect in relation to SA objective 8: water, due to the fact it is at risk of flooding.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 12: air quality, site 59740 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, sites appraised for mixed use receive some uncertainty, as it is unknown how much of the site will be used for residential development as opposed to other uses. We have responded to the estimated yield provided by TMBC, which was generated using a methodology agreed by the Council and applied to all sites.</p> <p>With regard to SA objectives 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>demand on local services; destruction of natural habitat and green spaces that this entails'. (BAG 2022)</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor positive (+?)</p> <p>Evidence from KCC data suggests that many residents on new developments e.g. Kings Hill do not use local schools, particularly at secondary level, but prefer to send their children to private schools out of the area. This has a knock on effect on the infrastructure and whilst the educational attainment of these children may be improved it would not be because of educational provision provided by this site. The negative effects of pollution and congestion at peak times would outweigh any possible advantages.</p> <p>Improvements in education and training would be better served in other areas of the borough. There is currently demand for places in primary and secondary education in ME19. Increasing housing stock with no guarantee of extra school places would be ill advised.</p> <p>New developments tend to attract a younger demographic so advantages for 'all sectors of society' would be disproportionate.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Significant positive (++)/Significant positive (++)</p> <p>The combination of high business rates, increase in home working and a shrinking workforce are forcing a more creative attitude to the world of work. The provision of excess business units at Kings Hill led to change of use in some plots that were designated for business developmet. The current use of the prime agricultural land on this site should be embraced and enhanced to ensure its full potential is achieved. The current political situation worldwide has only highlighted the need for food and energy sustainability closer to home. This site could provide both if managed properly.</p>	

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		<p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Uncertain significant negative (--?)</p> <p>This suggested site is rich in biodiversity particularly across the New Barns/Broadwater Farm and Well Street conservation areas. Species e.g. badgers, solitary bees, great crested newts, bats and dormouse populations, to mention but a few, would be severely effected should this area be developed. Migratory and indigenous birds would also suffer if their natural nesting and stopping off habitats were changed by air, light and noise pollution.</p> <p>Insects populations that contribute to pollination and feed many animals would decrease and would result in a contribution to global warming.</p> <p>High grade agricultural land would be lost in a time when there are calls for food self-sufficiency.</p> <p>I draw your attention to the following:</p> <p>‘Medway Gap and Vicinity survey carried out by ADAS Resource Planning Group in 1991 as part of the then Local Plan formulation. This reports that 71% of land at Eden Farm, West Malling, is grade 1 and some 50% of land at Broadwater farm is grade 1 and 2 with 70% being above grade 3, contributing significantly to the quality of the apples harvested there. In addition to the soil quality, there remains an abundance of water within two principal aquifers (underground watercourses) very close to the surface and hence the name Broadwater. Proposals to develop this land would be contrary to Chapter 4.2.1 of the Reg 18 Local Plan which specifically requires protection of high-quality agricultural land.’ (BAG)</p> <p>SA Objective 6: To protect and enhance the borough’s landscape and townscape character and quality</p> <p>Uncertain significant negative (--?)</p> <p>The New Barns/Broadwater Farm Conservation Area’s, designated in 1993, listed buildings, historic Cwylly and ancient rural lanes create an unique landscape that would be severely if not irreparably damaged should any part of this site be cut across by modern development. The status of the Conservation Area was designated as such because of the importance of the views into, out of and across the area. The</p>	

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		<p>vista would be severely diminished should this site be included in the local plan. Development of this site would impact the individual character of the small hamlets of New Barns, Springetts Hill and Well Street which are a unique feature of this rural community.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>Uncertain significant negative (--?)</p> <p>The significant number of listed buildings, ancient sunken lanes, Conservation Areas, Cwylla etc are recognised as contributing to a valuable cultural heritage. Any development across this area would be detrimental to this heritage and should be avoided.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>Significant negative (--)/Uncertain significant negative (--?)</p> <p>It is important that the natural water features in this area are retained in order to feed the ancient Cwylla and maintain the high quality agricultural land in the area. See SA Objective 5.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>Significant negative (--)</p> <p>The high quality agricultural land (49% Grade 1 & 2, 51% Grade 3) in this area should be protected. Any development on this site would risk contamination of this valuable land. As mentioned earlier the maximization of this land to serve the need for food and energy should be paramount.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Significant positive (++)</p> <p>It is a nonsense to assume that because there is a railway station nearby that fewer people would use cars. The reality of the Kings Hill</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>development and the surrounding estates is that more people are transported by car to the station than walk or cycle.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>Negligible (0)</p> <p>Any development on the Broadwater site would exacerbate the risk of flooding give that the water table is particularly high in the area. Flooding often occurs at various points along Broadwater Road and Well Street. Recent increases in heavy rain could result in adverse consequences.</p> <p>'The NPPF also promotes planning for adaptation, in respect of flood risk, biodiversity and water supply, to build in resilience and avoid increased vulnerability to property and people. The expectation is that plans should take a proactive approach to addressing these matters.'</p> <p>(Local_Plan_R18_Final)</p> <p>There is no guarantee that this recommendation would be fulfilled by developers.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>Any development on this site would unquestionably reduce air quality. There is no doubt that there is a move towards zero emissions but the reality is that this will be at a date far into the future. Increased traffic within Kings Hill, along the A228 and within the ME19 postcode are testament to a reduction in air quality. The concentration of housing development within the area and close by has undoubtable had a negative impact too.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>Uncertain minor negative (-?)</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Given that 'The site is within a Minerals Safeguarding Area' (Local_Plan_R18_Final) no unnecessary development of the area should be considered.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>Uncertain minor positive (+?)</p> <p>To reiterate the previous data it seems highly unlikely that this objective would be met.</p> <p>'Data covering the ME19 area as of 12th July 2022 shows the following:</p> <p>Average asking price: £516,433</p> <p>Average rental per week: £322'</p> <p>(https://property.xyz/uk/kent/west-malling)."</p>	
45009345	Annex 1	<p>"[59761]</p> <p>Human health and well-being will be affected by the removal of existing walkways, in particular the Kate Reed Wood site (ID 59761). This is a very popular walkway for residents as it offers a pleasant countryside alternative to the roadside for walkers.</p> <p>SA Objective report lists 7 negatives and 4 positives, this shows that the negative benefits of developing this site strongly outweigh the positive."</p>	<p>Site 59761 has been appraised in line with the site assessment criteria, as outlined in Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59761 receives a mixed uncertain significant negative and minor positive effect in relation to SA objective 1: health and wellbeing, as it contains open space which could be lost as a result of development although this is uncertain.</p>
44719265	Annex 1	<p>"[59608]</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of</p>	<p>Site 59608 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW)that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of thisSite would not represent sustainable development through actively reducing health inequalities, improvingaccess to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to</p>	<p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p> <p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p> <p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nurserygrounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRow adjacent to the site. The PRow is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need.</p> <p>Conclusion</p> <p>The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to.</p> <p>The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change.</p> <p>In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>We consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In our view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and we request that the Site is not allocated in the emerging Local Plan."</p>	
45097473	Annex 1	<p>"Dark Hill Farm 59709 – I object to the development of this site for the following reasons:</p> <p>SA objectives 1 and 3</p> <p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p> <p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>Site 59709 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59709 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Site 59709 is expected to have a significant negative effect in relation to SA objective 12, as it is within 100m of an AQMA and therefore is likely to exacerbate existing air quality issues if developed.</p>
45097473	Annex 1	<p>"Gracelands 59720</p> <p>And Borough Green Road 59793 - I object to the development of these sites for the following reasons:</p> <p>SA objectives 1 and 3</p> <p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore,</p>

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		<p>village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p> <p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p> <p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Sites 59720 and 59793 receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>These two sites also receive significant negative effects in relation to SA objective 6: landscape and townscape. This is due to their proximity to the AONB. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Sites 59720 and 59793 are expected to have negligible effects in relation to SA objective 12, as they are not within 100m of an AQMA.</p>
45097473	Annex 1	"Gracelands 59871	With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>and Ightham By-Pass 59872- I object to the development of these sites for the following reasons:</p> <p>SA objectives 1 and 3</p> <p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p> <p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p> <p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59871 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Site 59871 is expected to have a significant negative effect in relation to SA objective 12, as it is within 100m of an AQMA and therefore is likely to exacerbate existing air quality issues if developed.</p>
45097473	Annex 1	<p>"Ismays Road 59608 - I object to the development of this site for the following reasons:</p> <p>SA objectives 1 and 3</p> <p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p> <p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p> <p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59608 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Site 59871 is expected to have a significant negative effect in relation to SA objective 12, as it is within 100m of an AQMA and therefore is likely to exacerbate existing air quality issues if developed.</p>
45097473	Annex 1	<p>"Rectory Lane59770 – I object to the development of this site for the following reasons:</p> <p>SA objectives 1 and 3</p> <p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to</p>

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		<p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p> <p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59770 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Site 59770 is expected to have a significant negative effect in relation to SA objective 12, as it is within 100m of an AQMA and therefore is likely to exacerbate existing air quality issues if developed.</p>
45097473	Annex 1	<p>"Borough Green Gardens 59830 – I object to the development of this site for the following reasons:</p> <p>SA objectives 1 and 3</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close</p>

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		<p>* There is no capacity for this in schools or local GP surgeries.</p> <p>SA objective 2</p> <p>* Traffic is unsustainable as it is - the roads cannot cope with extra. Notwithstanding I also understand that buses are to be cut from the village. If this continues, I will have no choice but to drive my children to school and if this site goes ahead they face much longer car journeys.</p> <p>SA objective 5</p> <p>* This site is in the Kent Downs AONB and MGB. The development of this site would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA objective 6</p> <p>* This development will have a detrimental effect on the local character and distinctiveness of the historic village of Ightham.</p> <p>* It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA objective 10</p> <p>* Increased traffic will impact greenhouse gas emissions and damage peoples health because of poorer air quality.</p> <p>* My children and husband all have asthma and more traffic as a result of this site will worsen their conditions."</p>	<p>proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 2: services and facilities relates to accessibility, rather than impacts on the road network. The SA is too high-level to consider specific road networks and the Council will commission additional evidence on matters including traffic and air quality. Therefore, the site has been appraised in accordance with the site assessment criteria and it is correct that it receives a negligible effect in relation to this objective.</p> <p>The Kent Downs AONB is considered under SA objective 6: landscape and townscape, not SA objective 5 which relates to biodiversity and geodiversity. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59830 receives an uncertain significant negative effect for the reason outlined in the proforma (its proximity to the AONB). All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for</p>

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			<p>assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. Air quality is considered separately under SA objective 12: air quality.</p> <p>Site 59830 is expected to have a significant negative effect in relation to SA objective 12, as it is within 100m of an AQMA and therefore is likely to exacerbate existing air quality issues if developed.</p>
45219585	Annex 1	<p>"[59608]</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report[1] (#_ftn1) [2] is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility,</p>	<p>Site 59608 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration o the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>or recreational opportunities such as children's play areas or sports facilities.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of this Site would not represent sustainable development through actively reducing health inequalities, improving access to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons I submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. I submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design,</p>	<p>service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>scale and layout of development, which may help mitigate any adverse effects.'</p> <p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan[2] (#_ftn2) [3]. In my view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). I submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p> <p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p>	

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		<p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p> <p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>I submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nursery grounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p>	

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		<p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p> <p>In recognition of this I submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need.</p> <p>Conclusion</p> <p>The Site is located outside of any settlement boundary and within a Rural Area in part of the countryside designated as Green Belt. The Site is in existing agricultural use. It is not brownfield or previously developed land and therefore its allocation for residential development would, by definition, be inappropriate. The Site is also located within the AONB and allocation of the Site would result in significant negative effects to a landscape of scenic beauty which the Government affords the highest status of protection to.</p> <p>The Site is poorly accessible and not located near to schools, facilities or amenities that are important for health and well-being. As existing, the Site contributes to employment and economic growth which would be lost. The Site is sensitively located within an Archaeological Priority Area and near to designated heritage assets of national importance. The Site is also located over a Source Protection Zone and effects on water features and resources are unknown. The Site is not served by public transport and would not encourage walking or cycling. Occupiers of any future development would be dependent on use of a private car which would be in direct conflict with objectives to reduce greenhouse gas emissions and minimise climate change.</p> <p>In summary, the NPPF requires plans to provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to share their surroundings. It requires plans to be prepared with the objective of contributing to the achievement of sustainable development.</p> <p>I consider that the Interim Sustainability Review Report contains errors and that the Site has been incorrectly scored in relation to a number of the Sustainability Objectives. In my view, allocation of this Site would in fact result in a greater number of negative effects, many of which would be significant in scale. Allocation of the Site would fail to comply with the economic, social or environmental objectives required to achieve sustainable development in the plan-making process. It would not be consistent with the emerging spatial strategy or in any way contribute to the core aim of achieving sustainable development in the borough and I request that the Site is not allocated in the emerging Local Plan.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>(#_ftnref1)</p> <p>(#_ftnref2) "</p>	
45373697	Annex 1	<p>"SITE 59699 is grade 1 agricultural land and has been used as such for decades and should NOT be included in the Local Plan.</p> <p>There is a wide range of wildlife that inhabit the surrounding woodlands such as deer, bats, pheasants, and foxes.</p> <p>The site also slopes down towards the houses on Ewell Avenue so there would be a massive concern regarding flooding.</p> <p>You mention that there is a healthcare facility within 400m of this location which is not true....out healthcare provisions are already at breaking point since the closure of the surgery in West Malling High Street, causing us to have to drive to either Kings Hill (2.25km) or Leybourne (2.10km), where getting an appointment is like extremely difficult because of pressure caused by the number of patients that use the facilities.</p> <p>You also mention that there are bus stops and cycle paths. We have no cycle paths, and the nearest bus stop is either in the village which is 600m or Manor Park which is much further as there is no direct route to it.</p> <p>Access to the site would be via narrow country lanes which would cause increased traffic leading to a potential accident hotspot. There are big parts of Offham Road that do not have footpaths, the same with Fartherwell Road.</p> <p>This site has also had previous planning permission refused. There are a tree protection orders in place, in fact you refused a planning request just this year to 'top' the canapes of the scotch pines and oak trees!</p> <p>Also, this site was not submitted as part of the previous plan as it was not viable, so why has that changed! This site is also close to a conservation area and any development here would have a detrimental effect."</p>	<p>The purpose of SA is to assess all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>Site 59699 is recorded as having a significant negative effect in relation to SA objective 5: biodiversity and geodiversity as in addition to containing green infrastructure assets, it is also within close proximity with other biodiversity assets. All negative effects against SA objective 5 are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated.</p> <p>The SA states under SA objective 1: health and wellbeing that the site is within 800m of "an existing area of open space/ walking and cycle path/ play area/ sports facility" but this does not necessarily mean that it is within close proximity of all of these facilities, just one of them – hence the '/'. Likewise, the SA states under SA objective 4: economic growth that the site is within 400m of "a bus stop and/or cycle path" [emphasis added]. The site is within close proximity of bus stops, located along St Leonard's Street.</p> <p>The SA is too high-level to consider road width and traffic congestion, and so the Council will commission additional evidence on matters including traffic. The SA does not give consideration to previous planning applications or TPOs.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
45440929	Annex 1	<p>"4. The findings of the individual site assessments as they relate to land north of Church Road, East Peckham</p> <p>4.1 The Interim Sustainability Appraisal considers a number of sites that have been put forward as potential development opportunities; this includes the Hallam land at East Peckham (reference: 59813). The following paragraphs provide Hallam's more detailed commentary relative to the various Sustainability Objectives.</p> <p>4.2 To reaffirm Hallam are of the opinion that the Site offers an opportunity to deliver a sustainable landscape-led residential development for between 220 – 250 dwellings, alongside improved community facilities and a generous green infrastructure strategy that will deliver biodiversity net gain, new parkland and recreational opportunities.</p> <p>SA Objective 1: To improve human health and well-being</p> <p>4.3 Hallam propose a comprehensive landscape led approach to its development as described in its previous Vision Document. A generous Green Infrastructure Strategy is proposed which includes the placement of a countryside park that expands on the existing offering of the recreation ground. In order to reflect the rural character of the Site, the park will create a transition from the traditional character of the recreation ground to the south and the countryside character to the north. An opportunity exists to enhance connectivity and improve play facilities within the existing recreation ground. A new community orchard could be created in the south-western corner of the Site. A community orchard responds to the existing landscape character, but also provides a new asset with the opportunity for use by local residents, the primary school and activities by groups at the church or village hall. These are measures that can contribute to improving human health and well-being. (scoring positive)</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>4.4 Reflecting its status as a Rural Service Centre, East Peckham has a range of services and facilities. The proposed development is well-related to the primary school, Holy Trinity Church, the Village Hall (inclusive of Scalliwags Pre-School (2 – 5 years)), the convenience store, library, post office and pharmacy; most are adjacent the Site and all of which are within 1.5km of the Site. Future residents will be able to access these facilities by walking and cycling. Bus services are also adjacent to the Site (On Church Lane) with services to Tonbridge, Tunbridge Wells and Maidstone. Areas of employment and Beltring Railway Station are located to the south-east of the village. Residents</p>	<p>This is a 'policy-off' appraisal and so the site is appraised on its physical merits only, with no consideration given to mitigation (e.g. a landscape-led approach and provision of green infrastructure) and supporting documents submitted by site promoters. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59813 receives a minor negative effect in relation to SA objective 2: services and facilities, as it falls within the Fair Accessibility Band. This is in accordance with the site assessment criteria. The site's proximity to schools is considered under SA objective 3: education, whilst the site's proximity to bus stops is considered under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the SA acknowledges the site's proximity to an existing school and for this reason it receives a minor positive effect. The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. If a site contains an existing business that could be lost as a result of residential development, it receives a minor negative effect. All mixed use and employment site options are expected to have positive effects on this objective, as they provide opportunities for new jobs.</p> <p>Site 59813 is incorrectly recorded as having a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. In the next iteration of the SA, the site will receive a minor negative effect, as it does not contain a green infrastructure asset, and is within 250m and 1km of some Local Wildlife Sites and areas of Ancient Woodland. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure.</p> <p>Site 59813 receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. As mentioned already, this is a 'policy-off' appraisal and consideration is not given to supporting documents (e.g. a Historic Environment Desk-Based Assessment) submitted by site promoters.</p> <p>With regard to SA objective 8: water, the site contains land with a 1 in 30 year risk of surface water flooding. For this reason, it receives a significant negative effect in relation to this objective. The effect is</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>of the new housing proposed will have convenient access to these facilities and services. (scoring minor positive)</p> <p>SA Objective 3: To improve levels of educational attainment and skills training development for all age group and all sectors of society</p> <p>4.5 The Site is adjacent to a primary school and a pre-school. New residential development will generate new pupils that will support the school and the pre-school and take advantage of available school spaces and if required provide funding for improvements to the school. (scoring minor positive)</p> <p>SA Objective 4: To encourage sustainable economic growth, business development and economic inclusion across the borough</p> <p>4.6 The Site is close to existing employment located to the south of East Peckham and would provide labour supply to support the local economy. New employment would be created during the construction phase and future residents will increase local expenditure. (scoring minor positive)</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>4.7 The main body of the Site is arable land considered to be of low conservation value. Hedgerows on the Site comprise at least 80% native species and are therefore habitats of principal importance. There are some ditches offer wetland habitat for potential wildlife species. There are mature trees on the perimeter boundaries and a number of mature trees scattered across the Site but none of these are protected by a Tree Preservation Order (TPO). All existing habitats of value should be retained and enhanced. The development will seek to achieve a minimum 10% Biodiversity Net Gain across the Site. The Site is not subject to any statutory environmental or ecological designations. The proposed development would contribute positively to the protection and enhancement of biodiversity. (scoring minor positive)</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>4.8 The 'landscape led' scheme would respond to existing assets and sensitivities, maximising the value of the Site to deliver development appropriate to its context and for the benefit of the existing and future communities. Considerations include the maintenance of separation between existing settlements, the retention and enhancement of landscape features and character to positively shape the development. The inclusion of multifunctional and connected green infrastructure, offering ecological, water management and amenity benefits to the Site and wider setting is an important consideration. The proposed land uses are consistent with patterns</p>	<p>mixed with a negligible effect, as the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>With regard to SA objective 9: soil, the site has been appraised in line with the site assessment criteria. This is a 'policy-off' appraisal and so consideration is not given to the fact the site promoter states that a soils management plan would mitigate any adverse effects on this objective.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, the proforma acknowledges that the site is not within 100m of an Air Quality Management Area. For this reason, it receives a negligible effect in relation to this objective.</p> <p>With regard to SA objective 13: material assets and waste, the SA acknowledges that the site does not fall within a Minerals Safeguarding Area.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>and character of the wider landscape. (scoring negligible/minor positive)</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>4.9 Hallam has prepared a Historic Environment Desk-Based Assessment which demonstrates that the majority of nearby heritage assets are located away from the Site and are largely separated visually by intervening development, topography and vegetation. Whilst some of the Site may be visible from some vantage points along Hale Street and Bush Lane, this would only represent a low degree of harm to the assets' wider settings.</p> <p>4.10 The density and height of proposed buildings in the west near the churchyard boundary will need to be sympathetic to this setting albeit this can be adequately mitigated with appropriate design and placement of land uses (for example orchards or allotments), screening and planting. This effect is considered to equate to less than substantial harm as per National Planning Policy Framework (2021) ("NPPF") paragraphs 199-202 and the level of harm is low within the less than substantial range. Notwithstanding, this harm should be weighed against the significant public benefits of the scheme. (scoring minor negative)</p> <p>4.11 The Desk-Based Assessment confirms there is limited potential post-medieval archaeological features within the Site, and it recommends that no further archaeological evaluation is undertaken.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>4.12 The entire Site lies within Flood Zone 1; being an area of Low Probability of flooding, outside both the 1 in 100 (1% AEP) and 1 in 1,000 (0.1% AEP) year flood events. Mapping provided by the EA identifies that the majority of the Site has a very low to high risk of surface water flooding. Given the baseline Site characteristics and further mitigating measures to be implemented, residual flood risk from an overland flow mechanism is considered to be a low probability. Positive drainage systems will further reduce the risk of flooding within the built development. Sustainable Urban Drainage will have the potential to employ source control measures to control peak discharges to no greater than the baseline conditions. Coupled with the storm water control benefits, the use of SuDS can also provide betterment on water quality. (scoring minor positive)</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against contamination</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>4.13 Whilst the Site includes agricultural land that would in part be lost, a soils management plan would mitigate this to an extent. (scoring minor negative)</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>4.14 All new development will contribute to greenhouse gas emissions. New development at East Peckham will have the advantage of being accessible to local facilities, local employment and public transport services such that a range of modes of travel are available that will assist in reducing Carbon Dioxide emission associated with vehicular travel. New housing will be built to at least standards prescribed in the Government's Building Regulations which are being improved in order to achieve a greater level of energy efficiency and reduce domestic source emissions. (scoring minor negative)</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its Impact</p> <p>4.15 Climate change predictions indicate increased incidence of extreme precipitation; increased incidence of extreme temperature, increased storm events including high winds and rising sea levels and coastal storm surges. The River Medway and its tributaries has an extensive area of flood risk which precludes new development in large areas of land to the east and south of East Peckham. Areas to the north of the village are the most suitable for accommodating new development in these terms. Design measures can be incorporated to ensure that surface water drainage are sized adequately to cater for increased rainfall and storm events and new planting and house design can provide shading to reduce the effects of higher temperatures. (scoring minor positive)</p> <p>SA Objective 12: To protect and improve air quality</p> <p>4.16 There are seven declared Air Quality Management Areas (AQMA's) in the Borough, none of which are in the vicinity of East Peckham.[FN 3 - https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=283] Those AQMA's are declared on the basis of Particulate Matter (PM10) and Nitrogen Dioxide (NO2) emissions largely associated with vehicular traffic. It is unlikely that additional development at East Peckham will have any material effect on emissions in those locations. Estimated traffic generation from the proposed development is at a level such that air quality effects in East Peckham are likely to be negligible. (scoring negligible)</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>4.17 The Site does not fall within a Minerals Safeguarding Area. A waste minimisation strategy can be required as part of a planning</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>permission and measures to encourage recycling provided as part of the development. (scoring negligible)</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <p>4.18 Development at East Peckham would contribute to meeting the housing needs for the Borough and provide opportunities for local housing needs at the village and other smaller nearby villages which are otherwise constrained by the Green Belt.</p> <p>4.19 When comparing the Site score to adjacent land parcels at East Peckham, Site 59789 of circa 7ha is deemed to be a 'Significant Positive (++)' on the basis 'The site is expected to comprise 100 dwellings or more. It is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.' The same approach would apply to the land north of Church Road which should at least score equivalent.</p> <p>4.20 The Local Housing Needs Assessment identifies a net need of 36 new affordable homes per annum in the rural east sub-region. Over the 15 year plan period this amounts to 540 new affordable homes. East Peckham and is one of only two Rural Service Centres in this sub-region and would be a natural location for meeting a proportion of this need.</p> <p>4.21 The scale of the opportunity north of Church Lane is sufficiently large to provide a range of types and tenures of housing – market housing, affordable housing, first homes. (scoring major positive)</p> <p>Summary</p> <p>4.22 In the following table we have set out the Council's Interim SA against Hallam's assessment for convenience.</p> <p>Sustainability Objective</p> <p>Interim SA</p> <p>Hallam Assessment</p> <p>SA1</p> <p>+/--</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		+	
		SA2	
		-	
		+	
		SA3	
		+?	
		+	
		SA4	
		++	
		+	
		SA5	
		--?	
		+	
		SA6	
		-?	
		0/-	
		SA7	
		--?	
		-	
		SA8	
		--/(0)	
		+	
		SA9	
		--	
		-	
		SA10	
		+	
		-	
		SA11	
		0	
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		SA12	
		0	
		0	
		SA13	
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Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>0</p> <p>SA14</p> <p>+?</p> <p>++</p> <p>4.23 The above illustrates that the more detailed analysis set out here returns a more positive scoring with no significant negative effects.</p> <p>Summary</p> <p>Findings of the individual site assessments: We have set out an analysis of the development opportunity north of Church Lane in comparison with the findings of the Interim Sustainability Appraisal. This illustrates that the more detailed analysis set out here returns a more positive scoring with no significant negative effects."</p>	
43485921	Annex 1	<p>"Introduction</p> <p>This paper forms one of two main responses Broadwater Action Group (BAG) is submitting to TMBC as part of our response to the Regulation 18 Local Plan Consultation. The first paper, which has already been submitted, focusses on an assessment of policy related issues relevant to our objective of preventing inappropriate development of land between West Mailing, East Mailing and Kings Hill. This second paper focuses on a critique of the Interim Sustainability Assessment of Site 59740 Broadwater Farm.</p> <p>Executive Summary</p> <p>In summary, this Regulation 18 Consultation response focuses on responding to Question 8 for Site 59740 and BAG believes there is sufficient compelling evidence to exclude this site from going forward for development in the next draft of the Local Plan. Each of the fourteen Sustainability Assessment (SA) objectives and their sub-objectives have been reviewed by BAG and in many cases, based on the evidence provided in the Interim Sustainability Appraisal Annex 1 and what is known about the site , BAG does not agree with the initial assessments given by TMBC. BAG has offered its own assessment of each of the SA objectives including appropriate supporting evidence as necessary.</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>The SA does acknowledge the heritage assets within 250m of the site (including within the site). For this reason, the site receives a significant negative effect in relation to SA objective 7: heritage. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA also acknowledges the fact the site is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land. For this reason, the site receives a significant negative effect in relation to SA objective 9: soil. It is not possible to exceed Grade 1 or 2 best and most versatile agricultural land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Section A below gives a general overview of BAG's assessment of the suitability of the site and Section B gives an assessment of how BAG believes the Broadwater Farm site should be rated against the Sustainability Assessment objections and sub-objectives.</p> <p>Section A Overview of Lack of Site Suitability for Inclusion in Local Plan Going Forward</p> <p>The Broadwater Farm site was included in the previously disallowed and abandoned Local Plan and was, apparently, regarded as a Strategic Site as it was thought to be both available AND deliverable. The former Local Plan also included the expansion of the Green Belt from the west of West Malling to the Watlingbury Road for any land not consumed by 900 homes and related infrastructure.</p> <p>However, it appears that the deliverability aspect of this site was called into question as a totally inappropriate access road was added at a late stage without appropriate consultation. It is also understood that the single Conservation Area of New Barns and Broadwater Farm was originally described as two separate Conservation Areas either side of the site. It is now clear that the New Barns and Broadwater Farm Conservation Area was designated in 1992 for the views across, out of and into this area of quintessential Kentish landscape. Standing in the centre of the public right of way (MR111) in the middle of the Conservation Area, the views to the west are of New Barns Hamlet and its oast complex and to the east, the Broadwater farmstead and oasts are prominent in the landscape with the historic buildings of Well Street visible beyond. To the north rises Springetts Hill with its backdrop of the North Downs clearly visible behind. To the south, there is rolling farmland that hides all but a single roof top in the Kings Hill development. This, and the below, argues that there was, and continues to be, no justification for Broadwater Farm to be included in TMBC's plans as a Strategic Site.</p> <p>There is an outstanding current application (TM/21/02719) being considered for this site and which provides extensive 'information available to TMBC from many sources to draw on when considering whether this site should go forward to the next phase of planning. In addition to the 1,500 valid objections registered by local people, TMBC received many negative responses from the official consultees. The reality is that TMBC are now aware of numerous compelling and diverse valid reasons why this site is not suitable for large scale development. Indeed, certain aspects of the application have proven to be inaccurate (or even disingenuous). In particular, the presence of a KCC-listed ancient monument heritage asset (an Anglo Saxon Cwylle) and a primary aquifer crossing the site at less than 2m below ground level were ignored. The detailed hydrogeology report commissioned by BAG, and presented as Annex A, clearly indicates that any</p>	<p>This is a 'policy-off' appraisal and so the site is appraised on its physical merits only. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>In LUC's SA, all reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. The respondent has provided their own SA of this site. However, their appraisal is not in line with the site assessment criteria.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1. With regard to the respondent's point on uncertainty, if a site is recorded as containing a designated open space it receives some uncertainty, as it is unknown whether the open space will be lost or not, or integrated into development. With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59740 is 5ha or more, it receives a significant positive effect in relation to this objective. The fact it is also within 800m of a train station also contributes to this significant positive effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>mitigation of the existing water courses to allow building will cause damage to both heritage assets and an important 2 water source rising at Well Street.</p> <p>The soil quality is of the highest agricultural rating, at Grade 1 and 2, on the majority of the site (see Annex B — Agricultura! Land Classification, Medway Gap and Vicinity Local Plan- Land at Eden Farm/ Broadwater Farm West Mailing 1994). In other words, the soil of Broadwater Farm exceeds even the 'best and most versatile' description laid down under the Government classification system.</p> <p>Annex C is a map showing ail the sites included in the Regulation 18 Consultation document together</p> <p>with sites that have already been recently developed or had planning permission granted in the surrounds of Broadwater Farm. From these it is clear that the development of any of the farm would cause coalescence of not just the affected hamlet communities but would lead to coalescence of Kings Hill, West Malling, East Malling, Wateringbury and even Mereworth if 'windfall development' is included.</p> <p>We resist the temptation to mention the effect on highways congestion but this is covered in Annex D Highways Technical Appraisal by Les Henry Associates, another of the independent reports commissioned by BAG which highlights the over-capacity stress the road network which would serve Broadwater Farm is already under.</p> <p>Examination of TMBC planning records reveals that, in recent years, nearly 60% of housing development has occurred on just 1% of the current Tonbridge and Malling Borough and that is all with one mile of West Malling.</p> <p>The Broadwater Action Group feels that Broadwater Farm should now be excluded as a potential development site in the Local Plan and details responding to TMBC's Strategic Appraisal supporting this assertion follow in Section B.</p> <p>Section B Critique of Site Against Sustainability Assessment Objectives and Sub Objectives</p> <p>Using the visual representation scheme of the Interim Sustainability Appraisal (SA), BAG's review of this site would be as follows:</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlements of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, the minor negative effect is recorded as uncertain as although the site is within a Minerals Safeguarding Area, the actual effect will depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>The respondent has not provided a reason as to why they consider the uncertain minor positive effect against SA objective 14: housing unreasonable. Site 59740 is proposed for a mix of uses but it is unknown what percentage of the site will e provided for housing, hence the uncertainty.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SEE ORIGINAL SUBMISSION</p> <p>The above assessment is based on extensive research into what is known about the site. TMBC's published sustainability assessment is given below for ease of comparison.</p> <p>SEE ORIGINAL SUBMISSION</p> <p>The colour codes follow those given in the SA as follows:</p> <p>SEE ORIGINAL SUBMISSION</p> <p>In broad terms, even though TMBC's assessment of the site is not favourable on most of the SA objectives, BAG believes that, due to the significant amount of information already known about this site, it should have an even poorer scoring. This leads to a conclusion that as Site 59740 fails to meet the majority of indicators to deem it suitable for sustainable development, it should be 3 excluded from the new Local Plan going forward. Details of BAG's assessment are given below:</p> <p>SA Objective 1: To improve human health and well-being</p> <p>Taking into account an evaluation of what is known about the site, BAG believe the assessment on this Objective should be a "Significant negative", taking the following into account:</p> <p>The SA report suggests that the negative effectives of the loss of open space which would be lost as a result of development are uncertain. These effects are not uncertain as the open countryside and farmland of the site, and the public's access to it, will only be harmed by development. Any development will affect the open vistas and well being benefits of the area. The report mentions that the site is within "800m of an existing healthcare facility or open space". At 112.74 hectares this site is vast, 1.3 km from west to east and just under 2km from north to south and although it may be true that some of the site is within 800m of an existing health care facility, not all of it is and primary health care in the area is known to be under great stress. For example, the allocated space for a GP surgery at Leybourne Grange was eventually re-purposed after laying empty for several years as no GP practice was found to take it on and also, the MP for the area, Tom Tungendhat, even wrote to the West Kent Clinical Commissioning group asking them to confirm their objection to the proposal for 900 +</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>houses on the site due to the lack of primary care security in this part of Kent.</p> <p>Additionally, BAG would support its classification of the site as “Significant negative” with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* To encourage safety by design</p> <p>The very location of the site within the Quiet Lane network and the known existing black spots on the A228 does not encourage “safety by design”. At least 3 people have been knocked down at the pedestrian crossing on the A228 by vehicular traffic.</p> <p>* To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, children’s play areas and the countryside.</p> <p>Any development of this area would harm the promotion of healthy lifestyles for current residents and visitors alike. There is a very well used and inter-connecting network of rural footpaths and Quiet Lanes connecting West Malling, East Malling and Kings Hill. It is currently possible to travel on foot or cycle through countryside, farmland and Quiet Lanes between these settlements.-This important green space, with its rural footpaths, is used for leisure and is enjoyed by those seeking a healthier lifestyle and would be negatively impacted.</p> <p>* To improve access to health and social care services. Given the information presented there is no information presented to support this.</p> <p>* To reduce levels of anti-social behaviour.</p> <p>Residents of Kings Hill and its Parish Council have seen a worrying increase in antisocial behaviour in recent years. Given that any substantial new housing on this site is likely to replicate the essence, at least, of the Kings Hill model, it follows that there could well be an increase in antisocial behaviour, not a reduction.</p> <p>* To promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.</p> <p>Developing this site would only impact negatively on the existing green spaces of the site so 2 consequently the connection with nature already enjoyed by those who use the site could only be negatively impacted.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>BAG has been unable to verify the definition of a “Fair Accessibility Band” in this instance but would agree that it could be reasonably anticipated that an area which has open access to all at the moment would be negatively impacted by development so also suggests an assessment of “Minor negative”.</p> <p>Additionally, BAG would support its classification of the site as “Minor negative” with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* To tackle homelessness more effectively</p> <p>BAG is unaware of any evidence that a development such as this would tackle homelessness more effectively nor any evidence that the AFFORDIBILITY ISSUE would be addressed for TMBC residents all the time there is such a financial advantage to moving out of London and its suburbs.</p> <p>* To improve access to cultural and leisure facilities</p> <p>There is no evidence that such access would be improved.</p> <p>* To promote the use of more sustainable modes of transport &</p> <p>* To encourage walking, cycling and the use of public transport.</p> <p>The establishment of the communities at Kings Hill, Leybourne Grange etc have proven that road traffic is only getting worse in this area of Kent. The reality is that the most convenient form of transport for people, where they have a choice, is usually their own car and although any new development might “promote” or “encourage” more sustainable ways of moving around and undertaking daily tasks, is there actually any proof that a development such as this would achieve these given the complexities of everyday life for most people?</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>The SA narrative regarding this site refers to the site being within 800m of a primary or secondary school (not both). However the nearest focal secondary school (The Malling School} in East Malling, is, we understand, oversubscribed. There is no access from the site to the school and as the site is so large, only a small proportion is within half a mile of the school itself.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The narrative for the site states that it 's within 800m of a train station and that 5 Ha have been proposed for business deployment. As the plans for the site have not been published it is not possible to verify whether the 5 Ha deployed for business use are actually within 800m of the station or not.</p> <p>TMBC are encouraged to re-examine the original zonal use plans for Kings Hill and determine the proportion of business use sites for which have been re-allocated for housing as the old airfield site evolved. The outline plan may well include business and other commercial space but the reality is that experience points to the fact that developers can and do apply for change of use from commercial to housing which makes the SA designation against this criterion uncertain.</p> <p>Residents, workers and visitors to Kings Hill will all remember the many years that units in the "town centre" area of Kings Hill around Queen Street lay empty. It is thought that the underuse of these commercial spaces could be directly attributed to high lease costs and not due to lack of interest in the business space. Therefore, although a strong retail and commercial hub for Kings Hill was envisaged at the planning stage, this was not delivered as anticipated and parallels can be read into the potential development of Site 59740.</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> * To diversify employment opportunities * To increase employment opportunities * To encourage economic growth <p>No information has been found in the SA paperwork for this site to support these statements.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>The rich biodiversity of this site has been well documented and TMBC are in possession of information to support this, not least from the responses from Consultees, BAG and others in relation to Berkeley Homes' planning application for Broadwater Farm (TM/21/02719). It is therefore thought that the SA assessment for this site should be "Significant negative" rather than "Uncertain significant negative". Annex E gives the Wildlife Sub-Committee Report BAG submitted regarding this site which supports this assertion, however particular attention is also drawn to Ecological</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Advice Service comments submitted to TMBC in relation to application TM/21/02719 on 21 March 2022.</p> <p>Additionally, BAG would support classification of the site as “Significant negative” with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* To increase biodiversity net gain.</p> <p>This site currently provides a range of rich wildlife habitats, including meadows, orchards, hedgerows and wooded areas.</p> <p>* To protect and enhance habitats and wildlife corridors</p> <p>As the West Kent Badger Group highlighted in their response to TM/21/02719 and given as Appendix F, any development of this site would damage habitats not “protect and enhance”.</p> <p>* To protect and enhance designated sites of nature conservation importance</p> <p>The New Barns & Broadwater Farm Conservation Area would be impacted.</p> <p>* To protect and enhance wildlife especially rare and endangered species.</p> <p>The site as a whole currently provides habitats for both resident and migratory red-listed species.</p> <p>* To provide opportunities for people to access wildlife and open green spaces.</p> <p>Any development would restrict and limit the existing opportunities for people to access wildlife and open green spaces.</p> <p>* To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.</p> <p>Development of this area would not protect and enhance priority species (see Wildlife report Annex E).</p> <p>To protect, enhance and expand ecological networks and their interconnectivity.</p> <p>There is no current evidence to support this achievement of this objection, in fact the opposite is apparent.</p> <p>Conservation of biodiversity, including priority habitats and species, under the NERC Act</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>(S41).</p> <p>To protect and enhance sites designated for geodiversity.</p> <p>The Broadwater area is an area of geological interest, highlighted by the area's names such as "Broadwater" and "Well Street", which would neither be protected nor enhanced by development.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>BAG considers the impact of developing this area would not be uncertain but would lead to actual significant harm to the landscape's character and quality. As mentioned previously, the consultation process for application TM/21/02719 elicited a large body of information regarding the negative impact of developing the Broadwater area. The landscape character and quality fs currently derived through its unique mix of natural features (rolling open vistas, the Cwylla which is an historic Anglo Saxon monument) and important historic buildings, many of them both listed and protected by their positions within Conservation Areas. For example the New Barns and Broadwater Farm Conservation Area was designated as such, in part, due to the quality of views into, out of and across the area between the New Barns hamlet and the Broadwater farmstead with substantial oast house complexes at either side, completing a quintessentially Kentish landscape. Any further development in this area would certainly significantly encroach on these features. Any building proposed within view of the Conservation Area would contravene the reason for Conservation Area status being granted in 1993.</p> <p>Additionally, BAG would support classification of the site as "Significantly negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* Protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.</p> <p>BAG believes this sub-objective to be of particular importance for Broadwater as not only is the rural landscape "distinct" it is also unique containing the only listed instance of a "Cwylia" and is encompassed by a network of ancient sunken roads or hollow ways which are designated now as "Quiet Lanes".</p> <p>* To protect and enhance landscape character and quality.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Features are protected currently, development of the area would harm them rather than further enhance or protect them.</p> <p>* To protect and enhance AONBs within the borough and their settings.</p> <p>Although situated to the edge of an AONB rather than within it, further development would harm the setting of the Kent Downs AONB.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>BAG considers the impact of developing this area would not be uncertain but would lead to actual significant harm to its cultural heritage resource. As mentioned previously, the consultation process for application TM/21/02719 elicited a large body of information regarding the negative impact of developing the Broadwater area. The cultural heritage of this corner of Tonbridge and Malling is well documented and currently enjoys various statutory protections through its many listed buildings and Conservation Areas. BAG's Sub-Committee Heritage submission in relation to Planning Application TM/21/02719 (Appendix G) gives more detail.</p> <p>Additionally, BAG would support classification of the site as "Significantly negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* To protect and enhance historic landscape/townscape value.</p> <p>With reference to the New Barns and Broadwater Farm Conservation Area in particular, the historic landscape is currently protected. The views across and into and out of this area were particularly important in the Conservation Area designation and the associated visual amenity would undoubtedly be significantly harmed through further development.</p> <p>* To protect and enhance historic buildings and sites.</p> <p>Within this area are numerous listed buildings including The Barracks and Derbies on Well Street, East Malling which are Grade2* listed. This shows they are of particular national historic interest, in this case with strong links to the English Civil war.</p> <p>* Cultural Heritage</p> <p>As referenced above, the cultural significance of the area reflects not only the hop farming heritage which endures through the proliferation of oast buildings across the site, but also goes back to the English Civil War and beyond a thousand years.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>BAG strongly believes that development in this area would have a significant negative effect with regard to this objective. The report on the Hydrogeology of this area is attached as Annex A to provide further details but essentially this shows the existence of aquifers. It is these underground water courses which feed the ancient Cwylla, contribute greatly to the productivity of Broadwater Farm and also give rise to what becomes the Ditton Stream which actually rises at Well Street. Development of this area would cause damage to these water features. The narrative associated with this SA Objective does, of course, highlight the importance of protecting the aquifers as they are within a Source Protection Zone 1 and BAG believes that significant harm would certainly be caused by developing this area for example through certain hydrocarbon pollution and so the designation should be definitive and not “uncertain”.</p> <p>Additionally, BAG would support its classification of the site as “Significant negative” with these .</p> <p>comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <p>* Reduce the risk of flooding to existing communities and ensure no new developments are at risk.</p> <p>BAG is seriously concerned that should any developer attempt the mitigation of flood risk, this would lead to serious harm to the Anglo Saxon Cwylla, which, as has been stated previously, is a KCC listed monument. Mitigation would, additionally, affect the water which has been accessible to the historic properties of Weil Street and Broadwater Road since the area was first populated centuries ago. The water flow to the Ditton Stream would be impacted also. Due to being situated lower in the landscape than the surrounding area, the houses on the west of the New Barns hamlet would be at risk of flooding from any development to the south which interrupts the natural surface water drainage flows.</p> <p>* To protect and enhance ground and surface water quality.</p> <p>The Broadwater area is, as the name confirms, rich in ground and surface water resources, development would not enhance its quality and the best way to ensure its protection would be to keep the area in its current largely undeveloped state.</p> <p>* To protect and enhance water quantity, such as through high standards of water efficiency. The quality of the water which rises in</p>	

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		<p>Well Street is currently being investigated as a potential source of potable water by the local water authority, development of the area 2 would introduce pollutants which could seriously affect this.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>The SA assessment highlights the greenfield nature of this site and BAG agrees with the determination of “Significant negative” against this SA Objective. As confirmed in the soil report in Annex B more than 49% of land at Broadwater is Grade 1 or Grade 2 with 100% being Grade 3 and above i.e. Best and Most Versatile. The northern part of the site (formerly Eden Farm) was shown to have 90% grade 2 and above.</p> <p>BAG therefore agrees with the assessment of this Site as “Significant negative” and would further added the following comments on the sub-objectives:</p> <p>Sub-Objectives</p> <p>* To protect soil functions and quality.</p> <p>Developing this land would remove actively farmed land so this objective cannot be met.</p> <p>* To reduce the amount of derelict, contaminated, and vacant land.</p> <p>None of the land involved is of this type so this objection is not met.</p> <p>* To encourage development of brownfield land where appropriate.</p> <p>Only a small proportion of the land where the current farm buildings are situated could be classed as brownfield so this objection is largely unmet.</p> <p>* Avoid development of ‘best and most versatile’ soil.</p> <p>Grade 3 soil is designated as “Best and most versatile”, 100% of the soil at Broadwater Farm is at this level or even higher grade so its development should definitely be avoided.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>BAG disagrees that there is evidence to suggest that a 112 hectare development would reduce greenhouse gas emissions and would</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>suggest this Objective should be classified as a “Minor negative” at best.</p> <p>BAG would like to see TMBC undertake a real-world analysis of the travel and domestic hydrocarbon use of Kings Hill. The increase in traffic in to and out of Kings Hill during the twice daily rush hour and the steady flow into and out of the area at other times does not support the assessment of this criteria as “Significant positive”. The only support given for this assessment is that the site is within 800m of a railway station. There is no evidence of whether there would actually be any housing or businesses within this distance of the station as less than, approximately, 30% of the site that is within 800m of West Malling station.</p> <p>As has been commented on previously, developments of the proposed scale of Site 59740 actively encourage people to move from more expensive areas (London) to realise more home for their money, however new residents then typically need to extend their commutes to work. The Assessed Housing Need of 15,741, a thirty percent uplift, could only be fulfilled from people moving into the area and it is difficult to understand how this would or could reduce greenhouse gas emissions given the reality of normal every-day lives.</p> <p>Additionally, BAG would support its classification of the site as “Minor negative” with these comments on the sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> * To reduce greenhouse gas emissions. * To increase energy efficiency and require the use of renewable energy sources. * To reduce the use of energy. * To promote the use of more sustainable modes of transport. * To reduce the use of private car. * To encourage walking, cycling and the use of public transport. * Encourage the uptake of ICT. <p>Other than approximately (just) one third of the site being within 800m of a railway station, no other information is given to support an assessment of “Significant positive” against any of these sub-objectives.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p>	

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		<p>BAG is unaware of any information to support or challenge this assessment.</p> <p>SA Objective 12: To protect and improve air quality</p> <p>Although the site is not within 100m of an AQMA, BAG considers that TMBC should consider the establishment of an AQMA for the A228 from the south of Kings Hill through to Leybourne. There are significant traffic build-ups almost every working day and there are many more houses yet to be built in the vicinity which already have permission. It should also be noted that when the Reserved Matters for application TM/18/03034/OAEA were considered at Area 2 Planning Committee earlier this year, a significant concern of the Councillors was the proximity of the proposed playground site to the A228 and the potential risk from pollution. This confirms that TMBC are aware of and are sensitive to air quality issues in the vicinity of the western portion of this site.</p> <p>Additionally, BAG would support its classification of the site as “Minor negative” with these comments on the following sub-objective:</p> <p>Sub-Objectives</p> <p>* To protect and improve local air quality.</p> <p>Given the site is mainly green fields, orchard, hedgerows and trees, it is difficult to see how air quality could be improved by development.</p> <p>SA Objective 13: To protect material assets and minimise waste</p> <p>The vast amount of building sand which would be needed to develop a site of this size would need to be sourced locally, possibly from sites in Ryarsh, Borough Green or other local sites. Therefore although the material assets of Broadwater Farm may not be significantly impacted, materials would still have to be extracted locally having a harmful effect on the material assets elsewhere within Tonbridge and Malling .</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an approximate mix of sizes, types and tenures</p> <p>No new evidence has been provided as to the mix of housing sizes, types and tenures, however based on the known housing mix</p>	

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		<p>proposed by Berkeley Homes for the land covered by this site, an assessment "Uncertain minor positive" does not seem unreasonable.</p> <p>Annex List</p> <p>Annex A* - Assessment of the Origin of Water Supporting Cwylla Pond Within the New Barns and Broadwater Farm Conservation Area by GWP Associates</p> <p>Annex B - Agricultural Land Classification, Medway Gap and Vicinity Local Plan- Land at Eden Farm/ Broadwater Farm West Malling 1991 :</p> <p>Annex C - Map of potential and ongoing development sites in and around Broadwater and surrounding settlements.</p> <p>Annex D (1,2 & 3)* - Highways Technical Appraisal & Appendices by Les Henry Associates.</p> <p>Annex E* - BAG Wildlife Subcommittee Report :</p> <p>Annex F - West Kent Badger Group</p> <p>Appendix G* - BAG Heritage Subcommittee Report</p> <p>*The documents associated with these Annex were originally submitted to TMBC as response to the consultation regarding Planning Application TM/21/02719 for the development of Broadwater Farm."</p>	
45742881	Annex 1	<p>"Boyer assessment of the council's analysis for site ref. 59852.</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>*image*</p> <p>*image*"</p>	<p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). Therefore, the minor negative effect it receives in relation to SA objective 2 is correct.</p> <p>The site's proximity to healthcare facilities and open space is considered separately under SA objective 1: health and wellbeing. The site receives a significant positive effect against this objective, as it is within 800m of existing healthcare facilities, open space and walking paths.</p> <p>The site's proximity to schools is considered separately under SA objective 3: education whereby the site receives a minor positive effect as it is within 800m of at least one primary school (Palace Wood Primary School and Allington Primary School). All effects against this objective are uncertain, as school capacity is unknown.</p> <p>Site 59852 contains green infrastructure assets and they are in the form of trees and thick vegetation, which could be lost as a result of development. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value". The significant negative effect is recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. It is important to note that this is a 'policy-off' appraisal and so</p>

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			<p>consideration is not given to mitigation (e.g. Biodiversity Net Gain). If the site was allocated in the Local Plan via policy containing mitigation measures, it would be appraised on a 'policy-on' appraisal.</p> <p>Site 59852 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located inside of or on the edge of a settlement. However, we note that it is within close proximity to Allington in Maidstone, although boundary data was not available for settlements outside of Tonbridge and Malling. In the next iteration of the SA Report, this will be added to the 'Difficulties and Data Limitations' section. This is a 'policy-off' appraisal and so consideration cannot be given to the site promoter's assessment of landscape and visual amenity impacts, as all sites must be appraised on a consistent basis and information like this is not available for other sites. The same applies in relation to SA objective 7: heritage and the Archaeological Statement and Built Heritage Statement submitted by the promoter.</p> <p>The appraisal of site against SA objective 7: heritage is not misplaced, as the site is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. Again, consideration cannot be given to the site promoter's Heritage Impact Assessment, as this level of detail is not available for all sites and they need to be appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, consideration is not given to the supporting documents submitted by the respondent, which includes a flood risk assessment and drainage strategy. This is due to the fact all sites must be appraised on a consistent basis. It is correct for the SA to acknowledge the fact the site contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively being pursued for agricultural purposes.</p> <p>With regard to SA objective 13: material assets and waste, the site has been appraised in line with the site assessment criteria, which states "The effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed".</p>
43619329	Annex 1	<p>"[site 59647]</p> <p>Comments made on SA objective 8 in Appendix 3</p> <p>Please see</p>	<p>The site assessment criteria against which the site has been appraised are contained within Appendix D of the Interim SA Report.</p> <p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). As site 59647 is placed within the Good Accessibility Band in the Urban Capacity Study, it receives a negligible effect in relation to SA objective 2. Further detail on how this objective has been informed is provided at the start of Appendix D of the Interim SA Report under the heading 'Assumptions Regarding Accessibility'.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is within 1km of Ancient Woodland. In the next iteration of the SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		R1491 _221102_Lauren Sinden Rydon Homes Ltd"	<p>Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). The site will continue to receive an uncertain minor negative effect in relation to this objective. This is a 'policy-off' appraisal and so sites are appraised on their physical constraints only with no consideration given to mitigation (e.g. Biodiversity Net Gain). If the site were to be allocated in the Local Plan via policy containing mitigation measures, it would be appraised on a 'policy-on' basis.</p> <p>As just mentioned, this is a 'policy-off' appraisal and so consideration is not given to mitigation. Consideration is therefore also not given to supporting documents submitted by site promoters. This ensures all sites are appraised on a consistent basis. Therefore, the appraisal will not give consideration to the supporting documents submitted by the respondent.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The site receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, the site contains a significant proportion of Grade 2 (best and most versatile agricultural land). Please refer to the Agricultural Land Classification for further information on this.</p> <p>SA objective 10: climate change mitigation looks at proximity to public transport. As site 59647 is more than 800m from a railway station but within 400m of a bus stop, it receives a minor positive effect in relation to this objective. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. We note that this is only part of the much bigger picture.</p>
45925409	Annex 1	[SITE REFS: 59740 AND 59777 - SEE 'COPIES FOR LUC' FOLDER]	<p>The impact of the development of site 59740 on the historic environment has been appraised under SA objective 7: heritage in the SA. The site receives an uncertain significant negative effect in relation to this objective, as it is within 250m of heritage assets (including the Conservation Areas), as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p>

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			<p>The site is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlement of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>The SA gives consideration to the Agricultural Land Classification, which informs SA objective 9: soil. Site 5977 receives a significant negative effect in relation to this objective, as it contains a significant proportion of Grade 2 (best and most versatile) agricultural land.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 8: water, as it contains a water body and land with a 1 in 30 year risk of surface water flooding. The effect is uncertain as the effects on water quality are unclear.</p> <p>The SA is too high-level to give consideration to specific road networks and traffic and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p>
45934529	Annex 1	[SEE 'COPIES FOR LUC' FOLDER]	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not within the scope of the SA to consider the capacity of rail services. The SA is too high-level to give consideration to the availability of car parking spaces, road width and congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic and air quality.</p> <p>With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA also does not take into consideration the capacity of schools. The site assessment criteria for SA objective 3: education in Appendix D of</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA acknowledges that development of sites 59797 and 59800 would result in the loss of open space, under SA objective 1: health and wellbeing. The sites are expected to have mixed uncertain significant negative and minor positive effects in relation to this objective. The minor positive effects are due to the fact both sites are close to other areas of open space and walking paths.</p> <p>Although not explicitly stated in the proforma, the SA does acknowledge the fact sites 59797 overlaps a Local Wildlife Site (Kings Hill Golf Course, Cattering & Hoath Woods) and areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for the site will be updated to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites, or Ancient Woodland, or contains a locally designated site." Although site 59800 does not overlap a Local Wildlife Site, it is located directly adjacent to the Kings Hill Golf Course, Cattering & Hoath Woods Local Wildlife Site and areas of Ancient Wodland.</p> <p>Site 59797 receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield land and contains Grade 1 and 2 agricultural land.</p> <p>With regard to the respondent's 'Example reasons for objections', the SA gives consideration to Ancient Woodland, Local Wildlife Sites and green infrastructure assets, but does not specifically explore Defra's National Forest Inventory (NFI), which is used to monitor woodland and trees within the UK. As the SA is high-level, the NFI is considered too detailed for use in the SA. The SA is also too high-level to consider Tree Protection Orders (TPOs).</p> <p>Consideration is given in the SA to development outside of settlements under SA objective 6: landscape and townscape. If development is not located near any settlements in a rural location, a site is likely to have significant adverse effects in relation to landscape, as development cannot as easily be integrated into existing built development than if it were within or on the edge of a settlement, and therefore has more potential for adverse effects in relation to landscape character. This objective also looks at which sites are within close proximity of an AONB or not.</p> <p>As mentioned already, the SA is too high-level to give consideration to traffic congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic.</p> <p>Historic environment is dealt with under SA objective 7: heritage and if a site is within 250m of a heritage asset as recorded in the Kent Historic Environment Record, it receives an uncertain significant</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>negative effect. All effects against this objective are uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The Agricultural Land Classification is considered under SA objective 9: soil. If sites comprise Grade 1 or 2 agricultural land, they receive a significant negative effect. If sites comprise Grade 3 agricultural land, they receive an uncertain significant negative effect as the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p> <p>Lastly, loss of public open space is addressed under SA objective 1: health and wellbeing.</p>
45876449	Annex 1	<p>"Site 59737</p> <p>This is greenbelt land, effectively an extension/arm of the Platt Woods ancient woodland retaining the separation of rural settlements.</p> <p>SA Objective 1 – It will be 2400m to existing health centre – SIGNIFICANT NEGATIVE</p> <p>SA Objective 3 – To improve education – this is dubious as there may not be sufficient educational places available – SIGNIFICANT NEGATIVE</p> <p>SA Objective 5 – To protect and enhance bio diversity – This cannot be the case as there are badgers, slow worms and a host of other wildlife, trees (ancient woodland) and plants in this area – SIGNIFICANT NEGATIVE</p> <p>SA Objective 6 – To protect and enhance the boroughs landscape and townscape character and quality – The site is located on the edge of a settlement. It is greenbelt land. The purpose of greenbelt is to prevent merging of settlements. Development of this site would merge the rural settlements of Platt and Wrotham Heath. The former Platt school site has sat demolished and vacant for over a year. This type of brownfield site should be developed prior to the development of greenbelt land which can only be removed from greenbelt in exceptional circumstances. – SIGNIFICANT NEGATIVE</p> <p>SA Objective 7 – heritage asset – this must not be harmed – SIGNIFICANT NEGATIVE</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination – The site is greenfield land and contains a significant proportion of ancient woodland and agricultural land – SIGNIFICANT NEGATIVE</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change - Unless it is a net zero development</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The presence of Ancient Woodland is dealt with under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 1: health and wellbeing, the proforma for site 59737 states is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). As the site is within 800m of open space and walking path, it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites,</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>greenhouse gas emissions will be increased as a result the development process.</p> <p>Increased car use on the very busy Maidstone Rd will also result in increased gas emissions/air quality/noise pollution – SIGNIFICANT NEGATIVE</p> <p>SA Objective 12: To protect and improve air quality Increased car use on the very busy Maidstone Rd will also result in increased gas emissions/air quality/noise pollution – SIGNIFICANT NEGATIVE</p> <p>SA Objective 13: To protect material assets and minimise waste -The site is within a Minerals Safeguarding Area - SIGNIFICANT NEGATIVE"</p>	<p>cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 7: heritage, the site is already recorded as having a significant negative effect. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 9: soil, the site is already recorded as having a significant negative effect. As stated in the proforma for the site, the uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Ancient woodland is considered separately under SA objective 5, as has been taken into consideration in the SA.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. Air quality is considered separately under SA objective 12.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59737 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, the SA acknowledges the fact the site is located within a Minerals Safeguarding Area. In line with the site assessment criteria, it receives an uncertain minor negative effect as a result of this.</p>
42831585	Annex 1	<p>"Site 59698</p> <p>I would like to submit my objection against site 59698 being allocated in to Local Plan.</p> <p>SA objective 5 - this site would be harmful to local biodiversity given it is a rural area</p> <p>SA objective 6 - it would result in a loss of green space but also prime agricultural land</p> <p>SA objective 7 - the proximity to heritage assets in Broadwater Road and also East Malling. The development is in the line of site of Cobbs Hall.</p> <p>SA objective 9 - it would see the loss of greenfield land which is prime agricultural land</p>	<p>The SA does not allocate sites. The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>Sites 59698 and 59743 receive a minor negative effect in relation to SA objective 5: biodiversity and geodiversity, as they are located within 250m and 1km of Ancient Woodland. This is in line with the site assessment criteria. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure.</p>

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		<p>Site 59824</p> <p>I would like to submit my objection against site 59824 being allocated in to Local Plan.</p> <p>SA objective 5 - this site would be harmful to local biodiversity given it is a rural area</p> <p>SA objective 6 - it would result in a loss of green space but also prime agricultural land</p> <p>SA objective 7 - the proximity to heritage assets in Broadwater Road and also East Malling. The development is in the line of site of Cobbs Hall and would also impact the view from Broadwater Road across to Darcys Court including from the footpath from Broadwater Road to East Malling.</p> <p>SA objective 9 - it would see the loss of greenfield land which is prime agricultural land</p> <p>The additional traffic onto Clare Lane would cause further congestion into East Malling as well as exiting Broadwater Road more dangerous than current as it exits into a blind bend.</p> <p>Site 59743</p> <p>I would like to submit my objection against site 59743 being allocated in to Local Plan.</p> <p>SA objective 5 - this site would be harmful to local biodiversity given it is a rural area</p>	<p>Site 59698 would not result in the loss of designated open space, which is considered under SA1: health and wellbeing and SA6: landscape and townscape. Agricultural land is considered separately under SA objective 9.</p> <p>Sites 59824 and 59743 receive a significant negative effect in relation to SA objective 7: heritage, as they are within 250m of numerous heritage assets. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets. This is a 'policy-off' appraisal and so consideration is not given to mitigation. Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis.</p> <p>Sites 59698, 59824 and 59743 receive a significant negative effects against SA objective 9: soil in the SA, as they are greenfield and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>Site 59824 receives an uncertain negligible effect in relation to SA objective 5: biodiversity and geodiversity, as it is more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, and is over 250m from a locally designated site.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA objective 6 - it would result in a loss of green space but also prime agricultural land</p> <p>SA objective 7 - the proximity to heritage assets in Broadwater Road and also East Malling.</p> <p>SA objective 9 - it would see the loss of greenfield land which is prime agricultural land</p> <p>"</p>	
46064257	Annex 1	<p>"[59608]</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the</p>	<p>The proforma for site 59608 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sport facility (but not both). Specifically, the site is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site</p>

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		<p>Site is not located close to any areas of publically accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of thisSite would not represent sustainable development through actively reducing health inequalities, improvingaccess to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons we submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. We submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as</p>	<p>assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the effects on landscapes and townscape will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p> <p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan. In our view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1).We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p> <p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p>	

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		<p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p> <p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>We submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nurserygrounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p>	

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		<p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p> <p>In recognition of this we submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p>	

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		The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need."	
46064513	Annex 1	<p>"[59608]</p> <p>The Regulation 18 Local Plan is required to be subject to a process called Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development. The Interim Sustainability Appraisal Report[2] (#_ftn2) [2] is also subject to the Regulation 18 consultation.</p> <p>Assessment</p> <p>The Site has been subject to the SA process and of the 14 SA objectives, the Site has been scored as having a Minor positive effect on only 3 objectives. It has been scored as having a Significant negative, Uncertain significant negative or Uncertain minor negative effect on 7 objectives. With reference to the Interim Sustainability Appraisal Report and for the reasons set out below the allocation of the Site in the Local Plan would not contribute to sustainable development in the borough.</p> <p>SA Objective 1: To improve human health and well-being.</p> <p>The SA states: 'The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area / sports facility (but not both).'</p> <p>The site is located near to Public Rights of Way (PRoW) that give access to the countryside; however this is not uncommon in rural areas and does not make an otherwise isolated rural location suitable for development. With the exception of the Kent Wildlife Trust's Ivy Hatch wet woodland reserve, which is protected for its biodiversity value, the Site is not located close to any areas of publicly accessible open space. The site is also not located within 800m of a healthcare facility, or recreational opportunities such as children's play areas or sports facilities.</p>	<p>The proforma for site 59608 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path / play area / sport facility (but not both). Specifically, the site is within 800m of an area of open space (Scathes Wood) and a walking path. This is in accordance with the site assessment criteria.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration o the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. The site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA, this limitation will be added to the 'Difficulties and Data Limitations' section of the SA. Bus service frequency is, however, taken into consideration in the Urban</p>

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		<p>With reference to the sub-objectives set out in the Interim Sustainability Report Appraisal, allocation of this Site would not represent sustainable development through actively reducing health inequalities, improving access to health and social care services or reducing levels of anti-social behaviour or crime. For these reasons I submit that allocation of the Site would have a negative, and not Minor positive effect on human health and well-being that would not be consistent with delivering sustainable development.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p> <p>The SA states: 'The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.'</p> <p>It is understood that the Site is in existing use as a plant nursery and no evidence has been submitted to demonstrate the ongoing viability of the business is at risk.</p> <p>With reference to the sub-objectives set out in the Interim Sustainability Report, the allocation of the Site would result in the loss of the business and consequently it would likely increase unemployment and decrease employment opportunities and physical accessibility jobs. It would be in direct conflict with the objective to encourage sustainable economic growth, business development and economic inclusion across the borough. I submit that rather than a Negligible effect the allocation of the Site would result in a Significant negative effect on the objective to encourage sustainable economic growth.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The SA states: 'The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.'</p>	<p>Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p>

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		<p>This is factually incorrect. The Site is located within the Kent Downs Area of Outstanding Natural Beauty (AONB). Its allocation would be in conflict with paragraphs 170, 171 and 172 of the NPPF which provide that planning policies should protect and enhance valued landscapes and allocate land with the least environmental value and that great weight should be given to conserving and enhancing landscape and scenic beauty in AONBs.</p> <p>Within AONB's there is a requirement for development to be limited and that major development should not be permitted except in exceptional circumstances and where public interest can be demonstrated. This is reflected in Policy SD10 of the Kent Downs AONB Management Plan[3] (#_ftn3) [3]. In my view, the stringent tests set out in the NPPF have not been met. There are no exceptional circumstances, nor would it be in the public interest, given the scale of development proposed and significant harm that would arise to a nationally important and protected landscape.</p> <p>The Site is highly visible in views from the adjacent PRoW and its allocation would be contrary to the emerging spatial strategy in the Local Plan which states that in order to conserve and protect the environmental and heritage assets in the borough, designations including AONBs should be avoided (paragraph 4.2.1). I submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect that would not represent sustainable development.</p> <p>It is also relevant that the Site is designated as Green Belt. Section 13 of the NPPF confirms that the Government attaches great importance to Green Belts and the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The NPPF is clear that the construction of new buildings are inappropriate in the Green Belt, except in the specific circumstances identified in paragraph 149, including the partial or complete redevelopment of previously developed land.</p> <p>None of the other exceptions would apply. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource.</p> <p>The SA states: 'The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.'</p>	

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		<p>The Site is located within an Area of Archaeological Potential and within proximity of a number of Grade II listed buildings and the Scheduled Monument at Ightham Mote, which are all identified as of national importance. Irrespective of whether there is a line of sight, any development in this location has the potential to cause significant harm to above and below ground heritage assets which would be in direct conflict with the objective to protect and enhance them.</p> <p>I submit that rather than Uncertain significant negative effect, the allocation of this Site would result in a Significant negative effect on cultural heritage that would represent sustainable development.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination.</p> <p>The SA states: 'The site is located on brownfield land.'</p> <p>The Site is in existing use as a plant nursery and falls within the definition of an agricultural use under section 336 of the Town and Country Planning Act 1990 (as amended), which expressly includes horticulture, fruit growing, seed growing, market gardens and nursery grounds. Agricultural uses are exempt from the definition of previously developed land in Annex 2 of the NPPF. Annex 2 defines 'brownfield land' with reference to 'previously developed land'. The Site cannot therefore be classified brownfield land for the purposes of the NPPF.</p> <p>With reference to the sub-objectives in the Interim Sustainability Appraisal, its allocation would not encourage development of brownfield land. There is no evidence that the Site is derelict, contaminated or vacant and so rather than a Significant positive effect, the allocation of this Site would result in a Significant negative effect and would not represent sustainable development.</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change.</p> <p>The SA states: 'The site is more than 800m from a railway station but within 400m of a bus stop.'</p> <p>The Site is located approximately 350m from bus stops on Ightham Road via a PRoW adjacent to the site. The PRoW is narrow, unmade and unlit. Alternatively the bus stops are located over 850m from the</p>	

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		<p>Site via road; however there are no pavements and the roads comprise narrow, unlit lanes. Ightham Road is served by a single service; the 222 (operated by Autocar Bus & Coach Services) operates 6 services between Borough Green (over 4km away) and Tonbridge Monday to Saturday (plus a further 2 on schooldays). There are no buses on Sundays. There is no physical bus stop infrastructure on the northbound side of Ightham Road. The Site is also located over 400m from a bus stop on Coach Road. These bus stops also have no physical infrastructure and are served by a single service; the S4 (operated by Go Coach) is timetabled once daily Monday to Friday. There are no buses on Saturday or Sunday.</p> <p>The Site does not have safe access to any bus services that can be used to reliably access services and facilities required on a day to day basis and future occupiers of any development in this location would be reliant on the use of a car. In this respect the Site is not located within a socially or environmentally sustainable location.</p> <p>With reference to the sub-objectives in the Interim Sustainability Review the allocation of this Site would in no way reduce greenhouse gas emissions, would not promote the use of sustainable modes of transport or offer any opportunities to encourage walking or cycling as required by paragraph 105 of the NPPF. It would increase the use of the private car in direct conflict with the objective to minimise climate change and also severely compromise highway safety in this rural location.</p> <p>In recognition of this I submit that rather than Minor positive effect, allocation of the Site would result in Significant negative effects against this objective.</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>The SA states: 'The site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.'</p> <p>The Site does not comprise previously developed land and it would not be a sustainable location for new housing. By reason of its size and the relevant landscape and heritage constraints, it is also not capable of making any material contribution to the supply of housing in the Borough and would not offer an appropriate mix of housing sizes, types or tenures that would meet local housing need."</p>	

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46116737	Annex 1	<p>"[59608]</p> <p>Further, by the council's own assessment - as set out the site 59608 annex in Appendix B, Table 9 - the site does not fulfil the majority of the council's Sustainability Appraisal objectives. Therefore, compared to the available alternative sites mentioned in the Local Plan which wholly or mainly satisfy these important objectives, the site is not at all suitable for development - let alone on the scale proposed.</p> <p>In particular, I note that of the 14 Sustainability Objectives listed in the annex, 10 receive a ranking ranging from negligible to significant negative. Of the remaining four, just one objective is classed as a significant positive and only because the site is located on brownfield land. The remaining three objectives are deemed to give rise to minor positives. Hence, the site clearly does not fulfil the objectives when viewed in the round."</p>	<p>The sub-objectives the respondent refers to are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p>
46121761	Annex 1	<p>"[59424]</p> <p>Site 59424 Residential 164 dwellings woods end of Clearheart Lane</p> <p>This development is rear of Redwell Grove, Bancroft Lane, Hollandbury Park, Cellini Walk, Alderwick Grove, Quindell Place, Clearheart Lane, McArthur Drive, Victory Drive.</p> <p>SA objective 1: It is stated that the site is within 800m of a healthcare facility. We have used Google walking and the distance from Clearheart Lane to the front door of the WMGP Surgery is 1.29 km! The analysis against SA 1 does not demonstrate rigour and calls into question the quality of the overall plan.</p> <p>SA objective 3: We fail to understand how this can be a minor positive when the increase in demand for primary school places is not offset by any guarantee of additional resources for the local schools. Until there is such a guarantee this should be marked as negative.</p> <p>SA objective 6: The addition of a further 164 houses cannot improve the townscape character and quality on its own, there must be commensurate improvement in infrastructure and healthcare to enhance quality of life. Without such improvements it must be a significant negative outcome.</p> <p>SA objective 10: With additional housing comes additional cars which, unless they are all zero emission vehicles, will increase the overall</p>	<p>The proforma for site 59424 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path / play area / sport facility (but not both). Specifically, the site is within 800m of an area of open space and a walking path. This is in accordance with the site assessment criteria.</p> <p>With regard to SA objective 3: education, the site receives a minor positive effect, as it is within 800m of an existing school. The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 6 relates to the landscape and townscape, not the provision of infrastructure and healthcare. The site is incorrectly recorded as being within a settlement when it is on the edge of a settlement. This is as a result of the GIS analysis identifying a high percentage overlap between the site and settlement boundaries. In the next iteration of the SA, this site will receive an uncertain minor negative effect in relation to this objective.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p>

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		green house gas emissions from Kings Hill. The analysis refers solely to the local railway station and that there a bus stops in the vicinity. We assume therefore that the positive benefit identified comes solely from commuters using public transport. But you will be aware that bus services are being cut back and this encourages more use of personal vehicles. Unless there is a clear plan to remove personal vehicles from local roads the impact of the development must be to increase emissions. Of course, the houses will produce other emissions, such as gas boiler exhausts and we do not believe there will be credible alternative heating technologies widely available in the timescale of the local plan. The analysis should be significant negative impact."	
46121761	Annex 1	<p>"[59761]</p> <p>Site 59761 Kate Reed Wood (inc. Lumber Yard) Residential 86 dwellings</p> <p>SA Objective 1: It is stated that the site is within 800m of a healthcare facility or open space for well-being. We have used Google walking and the distance to the front door of the WMGP Surgery is 1.8 km. Due to the proximity of the A228 link between the West Malling by-pass and the A26, there is no nearby open space relevant to this site. Therefore, we think the minor positive assessment is wrong but the significant negative impact is appropriate. Yet again, the analysis against SA 1 does not demonstrate rigour and calls into question the quality of the overall plan.</p> <p>SA Objective 3: There is no school within 800m, the nearest is Kings Hill Primary School at 1,800m according to Google on walking mode. The assessment should be negative to some extent not positive.</p> <p>SA Objective 10/11: We fail to see how this site can have a positive assessment for emissions and impact on climate when the services to/from the local station are being cut-back in the Borough. Residents will be forced to use personal vehicles to reach the railway station and visit local supermarkets/shops.</p> <p>Access to site from north bound A228 will cause very considerable congestion on what is already a busy narrow road linking the West Malling by-pass traffic to the A26. We regularly experience stationary traffic back into Kings Hill from existing traffic loads."</p>	<p>The proforma for site 59761 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path / play area / sport facility (but not both). Specifically, the site is within 800m of an area of open space (some green corridors) and a walking path.</p> <p>With regard to SA objective 3: education, there is a school within 800m of the site (Kings Hill School Primary and Nursery). For this reason, the site receives an uncertain minor positive effect in relation to this objective.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p>
46121761	Annex 1	"[59797]	The proforma for site 59797 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path / play area / sport facility (but not both). Specifically, the site is within 800m of an area of open space and a walking path.

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		<p>Site 59797 West Quarter of Kings Hill Golf Course to A26 Residential 1228 dwellings</p> <p>The distances quoted to healthcare and school facilities are grossly in error. The closest point of the site the WMGP surgery is 1,440m (according to Google walking) not within 800m. It must have a significant negative assessment against the respective SAs."</p>	
46121761	Annex 1	<p>Analysis of sites: The analysis of some development sites against the strategic objectives is noticeable in the cut-and-paste of text that has taken place between sites that are in different locations (e.g. 59740 and 59761). Furthermore, in looking in detail at 59424, 59761 and 59797 we fundamentally disagree with the analysis and give detail on this below. We believe this undermines the overall credibility of the analysis and we expect TMBC acting on our behalf to rigorously audit the process and analysis. We have considered the following evidence source in making our comments: Interim Sustainability Appraisal Report - Annex 1: Reasonable Alternative Development Site Option Proformas (tmbc.gov.uk) (https://www.tmbc.gov.uk/downloads/file/2217/annex-1-reasonable-alternative-development-site-options)</p>	<p>The proformas have been generated using Geographical Information Systems (GIS), with stock sentences used for each site. It is very likely that sites in different locations will have the same stock sentence as they may both, for example, be located within 800m of an open space.</p>
42586401	Annex 1	<p>"[SITE REFS: 59594, 59602, 59603, 59699, 59716, 59733, 59406, 59596, 59648 AND 59649]</p> <p>[SEE 'COPIES FOR LUC' FOLDER - R0477 _221024_George Rothschild file]"</p>	<p>Although some of site 59406 is not within 400m of a bus stop, the SA measures straight-line distances from the edge of a site option, using the smallest distance between a site and existing services and facilities. The SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater". The site receives a minor positive effect in relation to SA objective 14: housing, as it will provide fewer than 100 dwellings. This is in accordance with the site assessment criteria, which states at paragraph D.33 "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>Sites 59602 and 59603 are correctly recorded in the SA as falling with 800m of an existing school, specifically a primary school (Valley Invicta Primary School). With regard to SA objective 14: housing, please see first paragraph of our response.</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated, including site 59699. As site 59699 is proposed for mixed use development, it receives a</p>

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			<p>positive effect in relation to SA objective 4: economic growth. The effect is significant, due to the fact the site is more than 5ha. As mentioned above, the SA measures straight-line distances from the edge of a site option, using the smallest distance between a site and existing services and facilities. This is acknowledged in the 'Difficulties and Limitations' section of the Interim SA Report. Site 59699 receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is on the edge of West Malling and therefore development may be more easily integrated into existing built development than if it were in a more rural area. All adverse effects against this objective are recorded as uncertain, as actual effects on landscape and townscape will depend on the design, scale and layout of development, which may help mitigate any adverse effects. SA objective 10: climate change mitigation looks at proximity to public transport, not the effects of an increase in vehicle movements which will be addressed separately in the cumulative effects section of the SA.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA Report, the justification text will be added to the proforma. In accordance with the SA methodology set out in Chapter 2 of the Interim SA Report, sites can have mixed effects. With regard to SA objective 10: climate change mitigation, not all of a site must be within 400m of a bus stop to receive a minor positive effect, and this is acknowledged in the 'Difficulties and Limitations' section of the Interim SA Report. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>TMBC has informed LUC that site 59733 comprises brownfield land. As noted above, the SA utilises straight-line distances and SA objectives 4 and 10 do not take into consideration the frequency of bus services.</p> <p>Site 59406 being located adjacent to other sites does not necessarily mean that it should receive the same effects as those sites. As sites 59406 and 59596 fall within different accessibility bands in the Urban Capacity Study (July 2022), they receive different effects against SA objective 2: services and facilities. Likewise, site 59406 is located within 800m of a primary or secondary school and so receives an uncertain minor positive effect in relation to SA objective 3: education. Site 59648 is not located within 800m of a primary or secondary school and so receives an uncertain minor negative effect in relation to SA objective 3. As mentioned already, the SA utilises straight-line distances but this is acknowledged in the Interim SA Report as a limitation. TMBC has informed LUC that site 59406</p>

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			<p>comprises brownfield land. With regard to SA objective 14: housing, please see first paragraph of our response.</p> <p>With regard to SA objective 3: education, site 59596 receives an uncertain minor positive effect as it is located within 800m of a primary or secondary school. This objective looks at proximity to schools, not the quality of walking paths to and from them. The SA is too high-level to consider these matters. With regard to SA objective 14: housing, please see first paragraph of our response.</p> <p>TMBC has informed LUC that site 59648 comprises brownfield land. With regard to SA objective 14: housing, please see first paragraph of our response.</p> <p>Site 59649 being located adjacent to other sites does not mean that it should receive the same effects as those sites. Site 59649 receives an uncertain minor positive effect in relation to SA objective 3: education, as it is within 800m of a primary or secondary school. Site 59648 on the other hand is located more than 800m of a primary or secondary school and so receives an uncertain minor negative effect. TMBC has informed LUC that site 59649 comprises brownfield land. With regard to SA objective 14: housing, please see first paragraph of our response.</p>
42606657	Annex 1	<p>"Representation on behalf of Berwick Hill Properties Ltd</p> <p>Question 8: Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report?</p> <p>NOTE: Due to the online consultation having a limit of 6000 characters, it is necessary to provide the representation for Berwick Hill Properties Ltd in respect of question 8 separately (below). The Interim Sustainability Appraisal of the individual sites seeks to go into considerable detail and therefore the following more detailed response is required:</p> <p>Individual site reference number: 59611. The inclusion of this vacant, brownfield, previously developed site, sandwiched between the A20 and M20, as a potential employment site is welcomed. However, its assessment within the Sustainability Appraisal against the following five of the SA Objectives should be reconsidered:</p> <p>SA Objective 4 - An industrial/warehousing allocation on the former Stocks Nightclub and Spring Villas site would contribute towards diversifying employment opportunities, increasing employment, encouraging economic growth, reducing levels of unemployment and improving physical accessibility to jobs. It therefore satisfies all of the sub-objectives of SA4.</p>	<p>SA objective 4: economic growth distinguishes between sites that are more than 5ha in size or smaller than 5ha in size. In line with the site assessment criteria, site 59611 receives a minor positive effect in relation to SA objective 4: economic growth as it will include employment development but which will be smaller than 5ha in size. The site also receives a negligible effect in relation to this objective, but this is as a result of the site not being within 800m of a train station or 400m of a bus stop or cycle path. Although different types of employment development may have different locational requirements, the SA is high-level and so does not look into the different types of employment that may be provided, particularly as this cannot be guaranteed.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity because it contains a green infrastructure asset in the form of woodland and thick vegetation. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p> <p>As site 59611 is not located near any settlements in a rural location, there is potential for it to have an adverse effect on landscape. The site is also within 500m of the AONB as so in accordance with the site assessment criteria, should receive an uncertain significant negative.</p> <p>With regard to SA objective 7: heritage, the site is within 250m of numerous heritage assets, as recorded in the Kent Historic</p>

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		<p>The reason given in the Interim Sustainability Appraisal for only attributing a 'minor positive' to the site is because it is not within 800 m of a train station or within 400 m of a bus stop. What the scoring criteria fails to take into account is that there are different types of employment, which have different locational criteria.</p> <p>Whilst it is right for high density office uses to be directed to town centres and to sites in close proximity to public transport nodes, this vacant, scrubland site is being promoted for industrial/warehousing, not offices. The NPPF only seeks to apply such a sequential approach to applications for main town centre uses, such as offices (paragraph 87). It does not apply to industry/warehousing, for which its proximity to the strategic road network, and the motorways in particular, should enable the site to score more highly.</p> <p>The fact that industrial/warehousing units could be accessed on this site without the need for HGVs to travel through towns, where they would cause congestion and potential air quality problems, should be taken into account and should be given just as much, if not more weight, than proximity to public transport. The different characteristics of warehousing is also recognised in the NPPG. Whilst most of the guidance is focused on the big strategic facilities, it states that ""the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinctive locational requirements that need to be considered"" (my emphasis) paragraph: 031 Reference 2a-031-2019 0722.</p> <p>Currently, the Borough Council is not planning specifically for industry/warehousing and is treating all employment generically. That is not appropriate here. The Council should have regard to its up-to-date Economic Development Needs Study, August 2022. It advises the Council that the largest employment sector in Tunbridge & Malling in 2021 is wholesale and transport. It goes on to identify particular growth opportunities for logistics in the Borough.</p> <p>The Economic Development Needs Study concludes that over the plan period there is a need for 292,940 m² of new industrial and storage/distribution development. This compares to just 53,320 m² of new office space (18% of the total employment requirement). Therefore greater weight should be given to the location requirements for industrial/distribution space, for which this brownfield site (ref: 59611) is ideally suited.</p>	<p>Environment Record. As such, it is correct for the site to receive an uncertain significant negative effect.</p> <p>With regard to SA objective 10: climate change mitigation, although different types of employment development may have different locational requirements, the SA is high-level and so does not look into the different types of employment that may be provided, particularly as this cannot be guaranteed. Due to the high-level nature of SA, SA objective 10 looks at access to public transport, although we note that this is only part of the much bigger picture.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>It is worth noting that the Borough Council has allocated the Invicta Business Park and Marley site immediately opposite, as employment land under Policy E2 and therefore the Council has already recognised that this is an appropriate location for employment development.</p> <p>In the light of the above, the site should therefore be reclassified as having a 'significant positive' (++) in respect of the economic growth objective.</p> <p>SA Objective 5 - The Sustainability Assessment states that the site contains an existing green infrastructure asset that could be lost as a result of new development and therefore under objectives set out under SA5, the site is classified as an ""uncertain significant negative"".</p> <p>Having regard to the criteria, the former Stocks Nightclub and Spring Villas site is previously developed land that is not designated for nature conservation, nor are there any known rare endangered species and the landscaping belt along the M20 would remain unaffected. The site does not provide any public access for people to access wildlife or open green spaces. The main central part of the site, which would be subject to the redevelopment, could not be regarded as a green 'asset'. This is derelict scrub land that is vacant and unutilised, with limited biodiversity value. Through redevelopment, there is an opportunity to enhance the biodiversity value of the site, and therefore far from being an ""uncertain significant negative"", the land offers the opportunity to make a positive contribution. The site should therefore be reclassified as a 'minor positive' (+) in respect of biodiversity in the Sustainability Assessment.</p> <p>SA Objective 6 - The proposal is not within or adjacent to a town and its redevelopment would have no effect on the townscape character and quality of any existing settlement. In terms of its landscape character, a landscape belt along its northern side, and the raised level of the M20, separate the site from the more open character of the land to the north of the motorway. The A20 provides the site's southern boundary, with Invicta Business Park and Morley builders merchants beyond. As such, there is no landscape character of quality to the south that needs to be protected. In any event, mature trees and other planting along the southern boundary of the site, provide a high degree of screening, enabling redevelopment of the site to be largely self-contained visually.</p> <p>It is considered that the Council should be using the opportunity provided by this local plan review, to reconsider the boundaries of the AONB, which, for inexplicable reasons, crosses the M20 and includes this brownfield site, with the southern boundary following the A20 in</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>this location. Under no reasonable assessment could site 59611 be considered to be of outstanding natural beauty. It is requested that an Officer visits the site to assess this for themselves. It is non-sensical for this previously developed site to be left as unutilised scrubland forever, merely because of the AONB designation, which appears erroneous. The site should therefore be reclassified as having a 'negligible' (0) effect on the Borough's townscape and landscape.</p> <p>SA Objective 7 - the site has been classified as having an ""uncertain significant negative"" by virtue of the fact that it is within 250 m of a heritage asset. This heritage asset is the Moat public house, which lies to the south east and is Grade II listed. Once officers have an opportunity to inspect the site, they will recognise that appreciation of this heritage asset is only when viewed from the west, looking east (i.e. redevelopment on the former stocks Nightclub and Spring Villas site would be behind the viewer and have no effect on the appreciation of the heritage asset.</p> <p>In the light of the above, the site should therefore be reclassified as having a 'negligible' (0) effect on the Borough's cultural heritage.</p> <p>SA Objective 10 - again this site is classified negatively by virtue of the fact that it is not within 800 m of a railway station or 400 m from a bus stop. As is set out in the response to SA4, industrial/warehousing development should be considered differently from office and other high density employment uses, which are appropriate to direct them to town centre and other highly accessible locations by public transport. Such locations are better suited to higher density commercial uses and for housing; not for industrial and logistics.</p> <p>Recognition should be given to the highly accessible nature of the site to the strategic road network, including the M20 and M26, which is the most important factor for HGVs, without them needing to travel through congested urban areas. Avoiding such congestion not only helps reduce delays, but also delivers a corresponding reduction in greenhouse gas and other pollutants.</p> <p>It is also worth noting that whilst public transport does not serve the site, it is close to a number of existing settlements, being an 11 minute cycle from Borough Green (which does have a station), a 6 minute cycle from Wrotham, 6 minutes from the High Street in Wrotham Heath and even the High Street in West Malling is only a 20 minute cycle. Officers should also note that there is a pavement that already runs along the northern side of the A20 at its junction with Nepicar Lane to the Little Waitrose, which could be reached in only a 2 minute walk and could therefore cater for lunchtime sandwiches and other</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>top up, food shopping trips. Such a facility would encourage walking and a reduction in the use of a private car, in line with SA10.</p> <p>Having regard to these factors and recognising the proposed industrial and warehousing use, the site should therefore be reclassified as a 'minor positive' (+) in respect of reducing greenhouse gas emissions in the Sustainability Assessment."</p>	
45947585	Annex 1	[SEE 'COPIES TO LUC FOLDER' - R1514 _221103_Katie & Daniel White]	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent.</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All reasonable alternative development site options have been appraised in line with the site assessment criteria contained in Appendix D of the Interim SA Report.</p> <p>SA objective 1: health and wellbeing looks at the proximity of sites to healthcare facilities and open space, in addition to walking and cycling paths, play areas and sports facilities. It also looks at whether a site contains open space that could be lost as a result of development. Site 59525 does not just receive a minor positive effect in relation to SA objective 1. It receives a mixed uncertain significant negative and minor positive effect. Specifically, the site is recorded as having an uncertain significant negative effect in relation to this objective, as it contains open space (Westwood Green) that could be lost as a result of development, although this is uncertain. The minor positive effect is due to the fact the site is within 800m of other areas of open space, and walking paths. The site is also recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact it contains land with a 1 in 30 year risk of surface water flooding. It does not fall within Flood Zone 3.</p> <p>The SA is too high-level to give consideration to road width, access to car parking spaces, natural light, water pressure and water meter installation, traffic congestion and fuel pipelines. The Council will commission evidence on matters including traffic.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>Annex 1 provides a 'policy-off' appraisal of all reasonable alternative development site options. This means that consideration is not given to mitigation (e.g. Sustainable Drainage Systems). Instead, sites are appraised on their physical constraints only. This ensures all sites are appraised on a consistent basis. If a site is allocated via policy in the Local Plan containing mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>The SA gives consideration to the proximity of sites to GP surgeries. As sites 59525, 59613, 59616, 59639, 59640, 59646, 59682, 59742, 59747, 59753, 59782, 59789, 59806, 59813, 59837, 59846, 59855 and 59876 are not within 800m of a healthcare facility, they receive a minor positive effect instead of a significant positive effect in relation to SA objective 1: health and wellbeing.</p> <p>The SA also gives consideration to the proximity of sites to public transport. The SA acknowledges under SA objective 10: climate change mitigation that sites 59525, 59613, 59682, 59742, 59782, 59789, 59813, 59837, 59855 and 59876 are not within 800m of a railway station, but are within 400m of a bus stop. Therefore, they correctly receive minor positive effects in relation to this objective. Sites 59616 and 59646 are within 800m of a railway station (Beltring) and so correctly receive significant positive effects in relation to SA objective 10. Sites 59639, 59640, 59747, 59753, 59806, 59846 are not within 800m of a railway station or 400m of a bus stop and so correctly receive minor negative effects against this objective. Whether a railway station is appropriate for commuting is dependent on where a person works.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Site 59613 receives a significant positive effect in relation to SA objective 9: soil, as it comprises brownfield land. Many areas of the Green Belt comprise brownfield land. Site 59613 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59613 receives a minor negative effect in relation to the SA objective. Site 59613 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact it contains land with a 1 in 30 year risk of surface water flooding. A large proportion of the site falls within Flood Zone 2 but it is only the edges of the site that fall within Flood Zone 3. Site 59613 receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p>

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			<p>This includes Snoll Hatch Conservation Area, in addition to Bullen Corner Conservation Area.</p> <p>Site 59616 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact a significant proportion of the site falls within Flood Zone 3, slightly overlaps land with a 1 in 30 year risk of surface water flooding and is adjacent to a watercourse. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality. It would not be possible at this early stage in the plan-making process to explore the effects of light and noise pollution on existing homes. The site is correctly identified under SA objective 9: soil as comprising Grade 1 or 2 agricultural land.</p> <p>Site 59639 is correctly identified in the SA under SA objective 9: soil, as comprising Grade 1 or 2 agricultural land. The site is not identified as being at risk of flooding, using information provided by the Environment Agency, and so receives a negligible effect in relation to SA objective 8: water.</p> <p>Site 59640 is not identified as being at risk of flooding, using information provided by the Environment Agency, and so receives a negligible effect in relation to SA objective 8: water. The SA correctly identifies the site as comprising Grade 1 or 2 agricultural land under SA objective 9: soil. The site receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets.</p> <p>Site 59646 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact a significant proportion of the site falls within Flood Zone 3, contains land with a 1 in 30 year risk of surface water flooding, borders a watercourse and contains water bodies. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality. It would not be possible at this early stage in the plan-making process to explore the effects of light and noise pollution on existing homes. The site is correctly identified under SA objective 9: soil as comprising Grade 1 or 2 agricultural land.</p> <p>Site 59682 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact it contains land with a 1 in 30 year risk of surface water flooding. As mentioned already, it is too early in the plan-making process to explore light pollution.</p> <p>The SA does not give consideration to the aesthetic value of trees but consideration is given to green infrastructure assets under SA objective 5: biodiversity and geodiversity.</p> <p>Site 59742 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact a significant proportion of the site falls within Flood Zone 3, contains land with a 1 in 30 year risk of surface water flooding and contains a watercourse. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality.</p>

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			<p>Site 59742 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact it contains land with a 1 in 30 year risk of surface water flooding. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality.</p> <p>Site 59753 correctly receives a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land. The site receives a negligible effect in relation to SA objective 8: water, as it is not identified as being at risk of flooding in accordance with information provided by the Environment Agency. Site 59753 receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>Site 59782 receives a negligible effect in relation to SA objective 8: water, as it is not identified as being at risk of flooding in accordance with information provided by the Environment Agency. The site correctly receives a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land.</p> <p>Site 59789 receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality. The site receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. The site is correctly recorded as having a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land.</p> <p>Site 59806 receives a significant negative effect in relation to SA objective 8: water, as it contains water bodies, a watercourse and land with a 1 in 30 year risk of surface water flooding. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality. The site receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. The site is correctly recorded as having a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land.</p> <p>Site 59813 receives an significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The site receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. The site receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape as it is on the edge of a settlement and so development may be more easily integrated into existing built development than if the site were in a more rural area. The site is correctly recorded as having a</p>

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			<p>significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land.</p> <p>Site 59837 receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. A significant proportion of the site falls in Flood Zone 2 with only a small proportion in Flood Zone 3. Site 59837 is recorded in the Urban Capacity Study (July 2022) as falling within the Good Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59837 receives a negligible effect in relation to the SA objective. Site 59837 receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. This includes Snoll Hatch Conservation Area, in addition to Bullen Corner Conservation Area.</p> <p>Site 59846 receives a significant negative effect in relation to SA objective 8: water, as it contains a water body and land with a 1 in 30 year risk of surface water flooding. The site does not contain areas within Flood Zone 3. The site is correctly recorded as having a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 3 agricultural land. The effect is recorded as uncertain, as it is unknown whether it comprises Grade 3a (high quality) or Grade 3b (not classed as high quality) agricultural land.</p> <p>Site 59855 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, due to the fact a significant proportion of the site falls within Flood Zone 3, contains land with a 1 in 30 year risk of surface water flooding and contains a watercourse. The effect is recorded as uncertain as it is unknown at this stage what effect development might have on water quality. Site 59855 receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. The site is correctly recorded as having a significant negative effect in relation to SA objective 9: soil, as it contains a significant proportion of Grade 1 or 2 agricultural land.</p> <p>Site 59876 receives a significant positive effect in relation to SA objective 9: soil, as it comprises brownfield land. Many areas of the Green Belt comprise brownfield land. Site 59876 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59876 receives a minor negative effect in relation to the SA objective. The site receives a significant negative effect in relation to SA objective 8: water, due to the fact a significant proportion of the site falls within Flood Zone 3 and contains land with a 1 in 30 year risk of surface water flooding. Site 59876 receives an uncertain significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. This includes Snoll Hatch Conservation Area.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
25315361	Annex 1	<p>The following sites are classified for the purpose of SA Objective 4 as being within 400m of a bus stop.</p> <p>59702 59666 59826 59790</p> <p>The bus stop is served only by one bus on Tuesday and one on Thursday. This poor level of public transport cannot support regular employment on the designated sites.</p>	<p>SA objective 4: economic growth (for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
25315361	Annex 1	<p>The following sites have been categorised as being within 800 metres of an existing health care facility.</p> <p>59702, 59790, 59826, 59847</p> <p>This is erroneous because the Phoenix Surgery in Burham and the nursing outpost in Eccles will be moved to Peters Village well before the new Local Plan comes into effect.</p> <p>In fact, once the medical facility is moved to Peters village then it will be inaccessible by public transport given the present bus service. This should be recorded as a significant negative for all sites in Eccles and Burham. For sites which are than 800m from a medical facility, there should be a clear distinction between those where the medical facilities can be reached by public transport and those where it cannot.</p> <p>Given that medical facilities will not be accessible by public transport from Eccles, all sites in Eccles should be categorised as being in the Poor Accessibility Band under SA Objective 2. This covers the sites above plus the following.</p> <p>59702 59666 59826 59790 59841 59768 59831</p> <p>Although there are two buses a week (Tuesdays and Thursdays), these travel from the new surgery to Eccles on the outward journey and from Eccles to the new surgery on the return journey.</p>	<p>Although the Phoenix Surgery is proposed to be moved to Peters Village, the SA reflects what services and facilities are present at the time of assessment.</p> <p>Access to public transport is dealt with separately under SA objective 10: climate change mitigation.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
42096289	Annex 1	<p>Site 59613 Objective 9 states the site is brownfield. Is green belt not brownfield. Objective 2 states fair accessibility. This is incorrect. Accessibility is poor. The only access roads are narrow and regularly flood from the Bourne, Coult and Medway and flash flood from run off from hills to the north and east. The Coult runs directly adjacent to the site and is a main river. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits for days in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CP10 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Similarly, paragraph 167 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Ground water tables are very high in this area. A recent application for a major development in the village highlighted the unsuitability of soakaways. Site 59613 will need considerable ground build up to achieve the</p>	<p>Site 59613 receives a significant positive effect in relation to SA objective 9: soil, as it comprises brownfield land. Many areas of the Green Belt comprise brownfield land.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Site 59613 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59613 receives a minor negative effect in relation to SA objective 2. The SA is too high-level to consider road width.</p> <p>Flood risk is covered under SA objective 8: water. Site 59613 is recorded in the SA as having a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding. A large proportion of the site falls within Flood Zone 2</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>minimum clearances at stated in the SuDS Manual. This will have the knock on affect of displacing surface and flood water into existing properties. Any discharge of surface water from this site into surrounding watercourses will create extra flooding downstream. The Pound, Old Rd, Medway Meadows and Branbridges already suffer from severe flooding from the Medway and Bourne. The Coult Stream regularly floods Hale St, Smithers Lane and further into the Clubbs Quarry. TMBC's 2016 Green Belt survey specifically mentions the Snoll Hatch Hamlet and the importance of anti coalescence measures being maintained to keep the Hamlet separate from the main village of East Peckham. Development of site 59613 will directly oppose this long standing anti coalescence policy. The Local Development Framework (para 6.3.35) state East Peckham, Snoll Hatch and Hale St must be kept separate and not filled in by housing. Site 59613 does not fall within a Rural Service Centre and never has. East Peckham lost it's GP practise in 2018 and should also no longer be classed as a Rural Service Centre. It has also lost its two village pubs and more recently it's bakers. Site 59613 is immediately adjacent to Snoll Hatch Character Area, the integrity of which must be preserved. The nearest train station is 2.4km from the site. The roads to it are narrow, without lighting or pavement and regularly flood making it impassable to pedestrian and vehicle. There is no parking at the station. No booking office. No telephone. No toilets. No wheelchair availability. No step free access. No accessible taxis. No impaired mobility set down. No staff. Due to above reasons I consider this site unsuitable.</p>	<p>but it is only the edges of the site that fall within Flood Zone 3. Although there are policies in the existing Local Plan that seek to mitigate flood risk, in addition to settlement coalescence, this SA is providing an appraisal of the emerging Local Plan only.</p> <p>Site 59613 has been appraised against SA objective 6: landscape and townscape, receiving an uncertain minor negative effect due to its location on the edge of East Peckham.</p> <p>The SA acknowledges that sites within and around East Peckham are not within close proximity of a GP surgery.</p> <p>With regard to the historic environment, the SA acknowledges that site 59613 is adjacent to two Conservation Areas (Bullen Corner East Peckham and Snoll Hatch East Peckham). For this reason, it receives a significant negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects are dependent on the design of development and whether there are lines of sight between it and nearby heritage assets.</p> <p>With regard to the nearest train station, the SA acknowledges that it is more than 800m from the site under SA objective 10: climate change mitigation.</p> <p>The SA is too high-level to consider lighting, pavements, and amenities like toilets.</p>
42096289	Annex 1	<p>Site 59876 Objective 9 states the site is brownfield. It is green belt not brownfield. Objective 2 states fair accessibility. This is incorrect. Accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway and flash flood from run off from hills to the north and east. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits for days in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CP10 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Similarly, paragraph 155 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Ground water tables are very high in this area. A recent application for a major development in the village (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59876 will need considerable ground build up (over 500mm) to achieve the minimum clearances at stated in the SuDS Manual. This will have the knock on affect of displacing surface and flood water into existing properties. Any discharge of surface water from this site into surrounding watercourses will create extra flooding downstream. The Pound, Old Rd, Medway Meadows and Branbridges already suffer from severe flooding from the Medway and Bourne. The Coult Stream regularly floods Hale St, Smithers Lane and further into the Clubbs</p>	<p>Site 59876 receives a significant positive effect in relation to SA objective 9: soil, as it comprises brownfield land. Many areas of the Green Belt comprise brownfield land.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Site 59876 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59876 receives a minor negative effect in relation to SA objective 2. The SA is too high-level to consider road width.</p> <p>Flood risk is covered under SA objective 8: water. Site 59876 is recorded in the SA as having a significant negative effect in relation to SA objective 8, as a significant proportion of the site falls within Flood Zone 3 and contains land with a 1 in 30 year risk of surface water flooding. Although there are policies in the existing Local Plan that seek to mitigate flood risk, in addition to settlement coalescence, this SA is providing an appraisal of the emerging Local Plan only.</p> <p>Site 59876 is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. In the</p>

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		<p>Quarry. TMBC's 2016 Green Belt survey specifically mentions the Snoll Hatch Hamlet and the importance of anti coalescence measures being maintained to keep the Hamlet separate from the main village of East Peckham. Development of site 59876 will directly oppose this long standing anti coalescence policy. The Local Development Framework (para 6.3.35) state East Peckham, Snoll Hatch and Hale St must be kept separate and not filled in by housing. Site 59876 does not fall within a Rural Service Centre and never has. East Peckham lost it's GP practise in 2018 and should also no longer be classed as a Rural Service Centre. It has also lost its two village pubs and more recently it's bakers. Site 59876 is immediately adjacent to Snoll Hatch Character Area, the integrity of which must be preserved. The nearest train station is 2.4km from the site. The roads to it are narrow, without lighting or pavement and regularly flood making it impassable to pedestrian and vehicle. There is no parking at the station. No booking office. No telephone. No toilets. No wheelchair availability. No step free access. No accessible taxis. No impaired mobility set down. No staff. Due to above reasons I consider this site unsuitable.</p>	<p>next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective.</p> <p>The SA acknowledges that sites within and around East Peckham are not within close proximity of a GP surgery.</p> <p>With regard to the historic environment, the SA acknowledges that site 59876 is adjacent to Snoll Hatch Conservation Area. For this reason, it receives a significant negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects are dependent on the design of development and whether there are lines of sight between it and nearby heritage assets.</p> <p>With regard to the nearest train station, the SA acknowledges that it is more than 800m from the site under SA objective 10: climate change mitigation.</p> <p>The SA is too high-level to consider lighting, pavements, and amenities like toilets.</p>
42096289	Annex 1	<p>Site 59837 Objective 9 states the site is brownfield. Is green belt not brownfield. Objective 2 states fair accessibility. This is incorrect. Accessibility is poor. The only access roads are narrow and regularly flood from the Bourne and Medway and flash flood from run off from hills to the north and east. The Leigh Barrier does not protect this area nor will any works to raise the height of the barrier. The majority of flooding of this area is travelling downhill on its way to the Medway. Much does not reach the Medway and therefore sits for days in Snoll Hatch for days. The site falls within flood zones 2 and 3. Policy CP10 states within the floodplain development should first seek to make use of areas of no or low risk to flooding before areas of higher risk. Similarly, paragraph 155 of the NPPF sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Ground water tables are very high in this area. A recent application for a major development in the village (ref 21/03353/FL highlighted the unsuitability of SuDS as there is not enough clearance between maximum groundwater levels and the underside of soakaways. Site 59837 will need considerable ground build up (over 500mm) to achieve the minimum clearances at stated in the SuDS Manual. This will have the knock on affect of displacing surface and flood water into existing properties. Any discharge of surface water from this site into surrounding watercourses will create extra flooding downstream. The Pound, Old Rd, Medway Meadows and Branbridges already suffer from severe flooding from the Medway and Bourne. The Coult Stream regularly floods Hale St, Smithers Lane and further into the Clubbs Quarry. TMBC's 2016 Green Belt survey specifically mentions the Snoll Hatch Hamlet and the importance of anti coalescence measures being maintained to keep the Hamlet separate from the main village of East Peckham. Development of site 59837 will directly oppose this long standing anti coalescence policy. The Local Development Framework (para 6.3.35) state East Peckham, Snoll Hatch and Hale St must be kept separate and not filled in by housing. Site 59837 does not fall</p>	<p>Site 59837 receives a significant negative effect in relation to SA objective 9: soil, as it comprises greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Site 59837 is recorded in the Urban Capacity Study (July 2022) as falling within the Good Accessibility Band. SA objective 2: services and facilities utilises this information and therefore site 59837 receives a negligible effect in relation to SA objective 2. The SA is too high-level to consider road width.</p> <p>Flood risk is covered under SA objective 8: water. Site 59837 is recorded in the SA as having a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding. Although there are policies in the existing Local Plan that seek to mitigate flood risk, in addition to settlement coalescence, this SA is providing an appraisal of the emerging Local Plan only.</p> <p>Site 59837 has been appraised against SA objective 6: landscape and townscape, receiving an uncertain minor negative effect due to its location on the edge of East Peckham.</p> <p>The SA acknowledges that sites within and around East Peckham are not within close proximity of a GP surgery.</p> <p>With regard to the historic environment, the SA acknowledges that site 59837 is adjacent to Snoll Hatch Conservation Area which contains numerous heritage assets. For this reason, it receives a significant negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual</p>

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		within a Rural Service Centre and never has. East Peckham lost it's GP practise in 2018 and should also no longer be classed as a Rural Service Centre. It has also lost its two village pubs and more recently it's bakers. Site 59837 is immediately adjacent to Snoll Hatch Character Area, the integrity of which must be preserved. The nearest train station is 2.4km from the site. The roads to it are narrow, without lighting or pavement and regularly flood making it impassable to pedestrian and vehicle. There is no parking at the station. No booking office. No telephone. No toilets. No wheelchair availability. No step free access. No accessible taxis. No impaired mobility set down. No staff. Due to above reasons I consider this site unsuitable.	<p>effects are dependent on the design of development and whether there are lines of sight between it and nearby heritage assets.</p> <p>With regard to the nearest train station, the SA acknowledges that it is more than 800m from the site under SA objective 10: climate change mitigation.</p> <p>The SA is too high-level to consider lighting, pavements, and amenities like toilets.</p>
42171937	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE – Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey,</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The456roofrma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation</p>

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		<p>registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE – should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE – This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Site is NOT</p>	<p>will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The457roofrma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The457roofrma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3:</p>

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		<p>within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE – This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE – This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on</p>	<p>education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered</p>

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		<p>this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE – Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE – This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE – Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE – Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of</p>	<p>under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE – Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE – This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	
42192289	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th460rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA</p>	<p>services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th461rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREESA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREESA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location and/or would result in a loss of designated open space, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school</p>

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		<p>Objective 10: DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective</p>	<p>(Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE	
42196289	Annex 1	The following sites should NOT form part of the local plan 59716-- ME19 6RF-- This site is a greenfield greenbelt site. St Leonards Tower is at the boundary of the site. It contains high grade agricultural land. It was deemed unviable in the previous local plan and therefore not submitted. Would add pressure to the road infrastructure around west street in west malling and GPs and School facilities. Lack of pedestrian walk ways along Offham Road. Sits outside of the current west malling village envelope. 59699-- ME19 6NN-- This site is a greenfield greenbelt site that contains grade 1 agricultural land. It sits outside of the current village envelope of west malling. The topography of the site would significantly impact the current rural character of the area as the elevation of the site would be visible from Teston Road and from St Leonard's Tower. Neither the road infrastructure through west street and along Offham road nor local GP services and schools could support such a significant development. This site was deemed unviable in the previous local plan and therefore not submitted. 59645-- ME19 6RE-- This site is a greenfield greenbelt site. Planning permission has recently been refused for this site and it was deemed unviable in the previous local plan. 59714-- ME19 6RD-- This site is a greenfield greenbelt site. Development here would add pressure to the road infrastructure along West Street and Offham Road and on GP and School facilities.	<p>The SA recognises sites 59716, 59699 and 59645 as comprising greenfield land under SA objective 9: soil.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Sites 59716 and 59699 are recorded in the SA as containing a significant amount of Grade 1 and/or 2 agricultural land, and so receive significant negative effects in relation to SA objective 9. Site 59645 is recorded as containing Grade 3 agricultural land but it is unknown whether it is Grade 3a (high quality) or Grade 3b (not classed as high quality) agricultural land, hence the significant negative effect is recorded as uncertain.</p> <p>The previous Local Plan is not relevant, as it was a different plan and so is not relevant to this SA.</p> <p>The SA is too high-level to consider specific road networks and topography of specific sites. Consideration is given to GP surgeries and schools in the SA though, under SA objectives 2: health and wellbeing and 3: education, respectively.</p> <p>The SA acknowledges that site 59716 is not within or on the edge of a settlement, and so it receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape.</p> <p>Site 59699 is correctly recorded as located on the edge of the settlement of West Malling and so correctly receives an uncertain minor negative effect in relation to SA objective 6.</p>
42260449	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* 10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* 11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE.</p>	<p>not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th465rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	<p>objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th466rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA</p>

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	<p>objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42273793	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th471rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative</p>

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		<p>landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is</p>	<p>effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th473rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42362881	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A), the importance of which has been highlighted by recent food shortages caused by the war in Ukraine. The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p>

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		<p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p>	<p>Th476rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th477rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42362881	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th482rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8:</p>

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		<p>Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous</p>	<p>water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th483rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not</p>

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		<p>biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA</p>	<p>located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from</p>

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		<p>Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. 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Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREEGreen Belt LandThe Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.** Rather all other options should be considered first.Best Most Valuable Agricultural Land (BMV)There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p>	
42401697	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p>

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		<p>wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy</p>	<p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th487rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular</p>

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		<p>their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are</p>	<p>basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th488rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is</p>

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		<p>inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of a-sorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane,</p>	<p>within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'.</p>

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		<p>Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42407553	Annex 1	Safe Cycle path from west Malling to Tonbridge town centre and another to Twells. Let's encourage folks out of their cars.	This comment relates more specifically to the Local Plan than it does the SA.
42438113	Annex 1	The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are</p>

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		<p>productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are</p>	<p>not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th491rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA</p>

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		<p>inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubb--up in periods of prolonged rain, exacerbating the above effect. Corroborating</p>	<p>objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th492rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE--</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA</p>

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		<p>Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42439137	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685· 59690· 59693· 59721· 59805· 59809I object to any development on these sites, for the following reasons:1) They</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within</p>

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		<p>form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.3) The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.4) Local food production is made more important by the effects of climate change.5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.7) Development will lead to a significant loss of biodiversity.8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.9) Development will put even more stress on the already stretched local health and education services.10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE· The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial</p>	<p>Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th495rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE. Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE. Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE. Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE. 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Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. 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		<p>East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. 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This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. 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Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· The site IS locat-d next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE</p>	<p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42440705	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:• 59685• 59690• 59693• 59721• 59805• 59809I object</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within</p>

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		<p>to any development on these sites, for the following reasons:1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.3) The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.4) Local food production is made more important by the effects of climate change.5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.7) Development will lead to a significant loss of biodiversity.8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.9) Development will put even more stress on the already stretched local health and education services.10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE• SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. • The site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE with MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. • This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE• Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.SA Objective 7: AGREE• SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. • The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable</p>	<p>Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th499rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>(BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- should be rated as NEGATIVE• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as negative• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE• Site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREESA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• Water run-off</p>	<p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th500rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly</p>

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		<p>from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE. Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE. Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE. Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREESA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE. Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE. There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE. Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE. Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE. Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: DISAGREE - Should be rated as NEGATIVE. Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE. Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE. Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE</p> <p>Green Belt LandThe Interim Sustainability Appraisal makes no reference to</p>	<p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge. It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first. Best Most Valuable Agricultural Land (BMV) There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that “site” 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	
42441857	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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		<p>MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would</p>	<p>SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th504rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to</p>

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		<p>therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective</p>	<p>buses is considered separately under SA objective 10: climate change mitigation. TSA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th505rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42448545	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th508rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th509rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>contains underground springs which regularly bubb--up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records</p>	<p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

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		<p>Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42460449	Annex 1	The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm	Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within

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		<p>and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA</p>	<p>Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th512rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. TSA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should</p>	<p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th513rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. 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		<p>be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). 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		<p>SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of</p>	<p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE	
42479393	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p>

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		<p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE</p>	<p>The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th517rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to</p>

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		<p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

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		<p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42511361	Annex 1	<p>Site ID: 59720</p> <p>I strongly object to this development as the proposed entrance at Fen Pond Road is unsuitable due to the following:</p> <p>a. Fen Pond Road is too narrow and speed that vehicles travel down the road would increase the potential for accidents.</p> <p>b. There is no pavement or walkways to the centre of the village, schools or transport links</p> <p>c. The development of 198 houses could create c400 cars, Fen Pond Road is unsuitable for that volume of vehicles.</p> <p>d. the development area is surrounding by woodland is within an AONB.</p>	<p>The SA is too high-level to consider site-specific access points, road width and pavements. The SA does, however, consider access to public transport under SA objective 10. Site 59720 receives a minor positive effect in relation to SA objective 10: climate change mitigation, as it is within 400m of a bus stop.</p> <p>The SA gives consideration to green infrastructure assets and Ancient Woodland under SA objective 5: biodiversity and geodiversity, and the AONBs under SA objective 6: landscape and townscape. Site 59720 receives a significant negative effect in relation to SA objective 5, as it contains green infrastructure assets in the form of woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Site 59720 also receives a significant negative effect in relation to SA objective 6, as it is within the AONB. The effect is recorded as uncertain, as the effects on landscape and townscape will depend on the design, scale and layout of development.</p>
42511361	Annex 1	<p>Site ID: 59793</p> <p>I object to the development outlined above.</p> <p>This development does not support my preferred Option 1 in the strategic plan.</p> <p>The development would impact woodland area and is within the boundaries of an AONB so should not be considered.</p>	<p>Site 59793 is recorded in the SA as receiving a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains a green infrastructure asset in the form of woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site is also recorded in the SA as receiving a significant negative effect in relation to SA objective 6: landscape and townscape, as it is located within the AONB.</p>
42511361	Annex 1	<p>Site ID: 59872 & 59871</p> <p>I strongly object to the two proposed developments above.</p> <p>Both of these developments would enter and exit via Fen Pond Road.</p> <p>Fen Pond Road is too narrow and speed that vehicles travel along the road would increase the potential for accidents.</p> <p>The entrance/exit is close to an historic building Ightham Church and housing would not be appropriate to this location.</p> <p>The development is also in an AONB.</p>	<p>The SA is too high-level to consider road width. The SA does, however, provide an appraisal of the effects development of these two sites would have on the historic environment and landscape. Sites 59872 and 59871 receive uncertain significant negative effects in relation to SA objective 7: heritage, as they are within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The two sites also receive uncertain significant negative effects in relation to SA objective 6: landscape and townscape, as they are located within the AONB. The effects against</p>

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			this objective are also recorded as uncertain, as the actual effects will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.
42519233	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th527rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th528rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p>	<p>at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p>	

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		<p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42540865	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th539rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	<p>uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th540rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect</p>

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is</p>

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p>	<p>correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	

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		<p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

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		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1: DISAGREE-- Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10: DISAGREE-- This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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42560033	Annex 1	59802-- Object due to green belt land, harm to quite lane and rural road network	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment
42560033	Annex 1	<p>Site 59531-- Object due to traffic impact, change of use of the area, loss of open space</p> <p>Site 59534-- Object due to change of character of the area, increased traffic, loss of open space</p> <p>Site 59544-- Object due to Harm to conservation area, harm to non-listed heritage assets</p> <p>Site 59802-- Object due to green belt, harm to the aquifer for streams</p> <p>Site 59800-- Object due to green belt</p> <p>Site 59655-- Object due to green belt and it being outside of confines of existing settlement</p> <p>Site 59634-- Object due ancient woodland and TPOs</p> <p>Site 59630-- Object due to proximity of ancient woodland, traffic implications on access roads</p>	<p>The SA is too high-level to consider traffic impacts, and so the Council will commission additional evidence on matters including traffic.</p> <p>Site 59534 receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it would result in a loss of designated open space. The effect is recorded as uncertain, as it is unknown whether the open space will be entirely lost or incorporated into development if the site is pursued.</p> <p>Site 59544 receives a significant negative effect in relation to SA objective 7: heritage, due to the fact it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as actual effects will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to sites 59802 and 59800, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Site 59802 receives an uncertain significant negative effect (as part of a mixed effect) against SA objective 8: water, as it is contains water bodies.</p> <p>Site 59655 is incorrectly recorded as having an uncertain minor negative effect in relation to SA objective 6: landscape and townscape when it should receive an uncertain significant negative effect, as it is not located near any settlements in a rural location. In the next iteration of the SA Report, site 59655 will receive an uncertain significant negative effect in relation to SA objective 6.</p> <p>Site 59634 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains Ancient Woodland and green infrastructure assets. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid some adverse effects and in some cases, result in beneficial effects. The SA does not give consideration to TPOs.</p> <p>Site 59630 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains green infrastructure assets and is adjacent to Ancient Woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid some adverse effects and in some cases, result in beneficial effects.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42586305	Annex 1	<p>TONBRIDGE AND MALLING BOROUGH COUNCILCONSOLTATION ON REGULATION 18 LOCAL PLANOBJECTIONS TO PROPOSED SITE 59494, THE LAKES, ME20 6GZINTRODUCTIONI am writing to object to the inclusion of Site 59494 at The Lakes, Larkfield, ME20 6GZ, within the TMBC Local Plan.My wife, three children and I have lived at No.33 The Lakes since the house was first built in 2004. Two of my children are now at secondary school in Maidstone, one of whom has mobility difficulties due to cerebral palsy.Berkeley Homes built The Lakes estate under strict planning permission conditions which included creating improved amenity for the local community by opening up access to the adjacent gravel lakes accompanied by significant investment in the associated local environment. The resulting Leybourne Lakes Country Park has flourished over the last 20 years it has been in existence, and the wider community is benefiting as intended.A large attraction of the development to us was the open nature of the estate itself with plots spaced in a way that maximises a feeling of airiness. The development's design was very much conceived with the large landscaped grass 'village green' at its centre. Everyone who visits us at the estate for the first time always comments on how wonderful it is.A significant reason for us moving to The Lakes was because the no.71 bus to Maidstone had a terminal bus stop on the estate at Site 59494. This made it convenient for my wife who doesn't drive to get our three children to and from school in a sustainable way. This was particularly important given my disabled daughter has mobility difficulties. However, the bus service was unfortunately discontinued by Arriva from the estate several years ago, and the bus shelter removed. My family now have to walk the extra distance over to Tesco's bus stop via the spine road in front of Site 59494, and so their safety is of utmost concern to us in the face of Site 59494's potential development.The proposed building of 20 houses / flats on this grass 'village green' area, completely removes the 'heart' of our estate, and would bring with it multiple disadvantages which I set out further in my objections below:MATERIAL PLANNING CONSIDERATIONSThe TMBC planning portal sets out matters which are taken into account when considering planning applications. I have used the stated sub-headings to structure my response below.Local, strategic, regional and national planning policies and any previous planning decisions:The land at Site 59494 was always intended by the developers Berkeley Homes as an area of visual and recreational amenity for The Lakes estate. In the intervening 20 years, there has been no intention whatsoever of development on the site which is still owned by Berkeleys. The inclusion of Site 59494 within the new Local Plan as a place for new houses would completely renege on the premise of the original planning consent, and ignores the substantial</p>	<p>Site 59494 is incorrectly recorded as containing a designated open space, as it slightly overlaps Leybourne Lakes Country Park to the north east. In the next iteration of the SA Report, the site will receive a minor positive effect only, as it is adjacent to the County Park and so people will have easy access to it. Although the site comprises an area of open land, this is not designated an open space and so the next iteration of the SA Report will not acknowledge the site as comprising open space.</p> <p>The SA is one of many factors that feed into the plan-making process. It does not specifically identify which sites should come forward through allocations in the Local Plan but provides an objective assessment of their sustainability.</p> <p>Site 59494 is within 800m of a railway station and so it receives a significant positive effect in relation to SA objective 10: climate change mitigation, which covers public transport.</p> <p>The SA is too high-level to consider traffic volumes and access to car parking, so the Council will commission additional evidence on matters such as this.</p> <p>With regard to the natural environment, the site receives an uncertain minor negative effect as it is within 250m of Leybourne Lakes Country Park and Local Wildlife Site</p>

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		<p>local amenity enhancements already achieved at Leybourne Lakes Country Park, made possible in the first place through the funding generated partly by home-buyers on the estate such as myself. Whether the proposed use is a suitable one for the area, taking into account noise, smell, disturbance resulting from the use: There would clearly be an increase in noise and disturbance on the estate by shoe-horning 20 additional homes into its centre. Significantly, traffic, parking and safety of pedestrians are major factors, covered by my responses under the appropriate sub-headings below. Design, appearance, materials, layout and density of buildings: The layout and density of any proposed design incorporating 20 houses / flats onto Site 59494 would instigate a considerable change of use of the land, one for which the estate was not originally planned. The loss of the central 'village green' would transform its appearance for the worse, and inevitably create a feeling of over-crowding. The loss of the substantial grassed area could create additional surface run off, and together with the additional wastewater loading from the properties, could overload the existing drainage and wastewater system, which was unlikely to have been designed for this eventuality. Also, construction of additional access for the properties on to the estate's principal spine road will impose major change to the current configuration with detriment to wellbeing, health and safety of current residents. Significant overshadowing, overlooking or loss of privacy: The loss of the central 'village green' at Site 59494 to houses or flats would clearly cause overshadowing, overlooking and loss of privacy to all existing surrounding properties. This completely goes against the original architecture of the estate which was based on properties built around and facing on to the 'village green'. Highway safety, parking, access and traffic generation: Any development at Site 59494 would have an enormous negative impact on highway safety, parking, access and traffic. The road arcing around the periphery of Site 59494 is the principal spine road providing access to all vehicles entering / leaving the estate for the entire 310 existing properties. The road is also used for parking by many residents, meaning it is frequently necessary to weave around parked cars with only room for single-file traffic. At present, drivers have a clear view across the 'village green' in both directions which eases this situation, enabling vital visual communication between drivers, so that vehicle blockages are avoided. Likewise, pedestrians and other road users also benefit from this open visibility. Construction of 20 houses / flats on Site 59494 would inevitably block this vital visibility, with detriment to the safety of road users and pedestrians. Also, the additional vehicular access on to the spine road for the new houses or flats would exacerbate the safety risks and likely reduce the existing parking capacity available along the spine road. Additionally, it is unlikely that sufficient off-road car parking would be generated for the new 20 houses / flats, putting yet more pressure on roadside parking. The resulting bottleneck would create permanent frustration, and could hinder access for the local council waste collection services, emergency response services, and also larger delivery vehicles that have become a regular part of ordinary life. Clearly, the overall impact</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>would be significantly detrimental to the wellbeing and health and safety of existing residents and visiting road users. My family is personally affected as my children, including my disabled daughter, use this route daily to walk to the Tesco's bus stop to get to and from school. Visual effect on the landscape, nature conservation, loss of trees or hedgerows: The grass area at Site 59494 is used by many residents as a place to relax, their children to play, and provides general visual amenity to passers-by. Residents contribute through monthly estate management fees to its upkeep, and significant effort is invested to maintaining the landscaping of the area for the benefit of all. The visual impact of constructing 20 houses / flats on Site 59494 and resultant loss of the 'village green' for the estate would be considerable, transforming the feel of the estate from one of openness to one of over-crowding. As already mentioned, the change of use of the land would lead to loss of permeable grassed surface, and could exacerbate loadings of surface water runoff putting further pressure on drainage systems which in turn could cause flooding both on the estate or further afield. Effect on a conservation area or any historic buildings and local archaeology: No effect that I am aware of. Size and location of proposed advert signs: Not relevant. SUMMING UPI have set out above my objections to the inclusion of Site 59494 in the new Local Plan. The benefits of the proposed development for the occupants of the additional 20 houses / flats are completely outweighed by the detrimental effect on the wellbeing and safety of the occupants of the 310 existing properties on the estate, members of the public passing through the estate, the wider community, and local amenity. Site 59494 must not be included in the new Local Plan. Richard Money 33 The Lakes Larkfield Aylesford ME20 6SJ</p>	
42587393	Annex 1	<p>Green Belt Land</p> <p>The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development "that protects areas of particular importance", which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?</p> <p>**Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.</p> <p>It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>** Rather all other options should be considered first.</p> <p>Best Most Valuable Agricultural Land (BMV)</p> <p>There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.</p> <p>** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.</p> <p>The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.</p> <p>** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p> <p>Site Specific Comments with regard to BMV</p> <p>SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%.</p> <p>SITE 59721: Grade 2 land makes up at least 50% of the site.</p> <p>SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%.</p> <p>SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site.</p> <p>**This has the effect of considerably diluting the % of grade 2 land on the combined "site". I contend that "site" 59805 is not a true single site</p>	<p>Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		as it is bisected by a road. In theory the further enlarging OF sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.	
42588929	Annex 1	I should like to comment on the following sites;-59645 Outside of the village boundry59699 Lack of facilities, i.e no GP, no room in schools59714 Within Greenbelt or on Greenfield or Top Grade agricultural Land59716 Close to a conservation area and historical place of interest	<p>Site 59645 is incorrectly recorded in the SA as not located near any settlements when it is adjacent to a settlement, and so incorrectly receives an uncertain significant negative effect. This is due to the fact there was no percentage overlap between it and the settlement. In the next iteration of the SA Report, site 59645 will receive an uncertain minor negative effect in relation to SA objective 6: landscape and townscape.</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated. Site 59699 will therefore receive a minor positive effect in relation to SA objective 1: health and wellbeing, instead of a significant positive effect.</p> <p>With regard to school capacity, the site assessment criteria in Appendix D of the Interim SA Report for SA objective 3: education acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>The SA acknowledges under SA objective 9: soil that site 59714 is greenfield and contains a significant proportion of Grade 3 agricultural land. The effect is recorded as uncertain, as it is unknown whether the Grade 3 agricultural land is Grade 3a (high quality) or 3b (not classed as high quality).</p> <p>In the SA, site 59716 receives a significant negative effect in relation to SA objective 7: heritage, as it is located within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7 are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>
42589121	Annex 1	The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they	Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th555rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubb--up in periods of</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the</p>	<p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42589889	Annex 1	<p>Site ID: 59720.I strongly object to this development, the proposed entrance at Fen Pond Road is unsuitable due to the followinga. Fen Pond Road is too narrow and speed that vehicles travel down the road</p>	<p>The SA is too high-level to consider site-specific access points, road width and pavements. The SA does, however, consider access to public transport under SA objective 10. Site 59720 receives a minor</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		would increase the potential for accidents. b. There is no pavement or walkways to the centre of the village, schools or transport links.c. The development of 198 houses could create c400 cars, Fen Pond Road is unsuitable for that volume of vehicles.d. The development is surrounded by Woodland and is within an AONB.	<p>positive effect in relation to SA objective 10: climate change mitigation, as it is within 400m of a bus stop.</p> <p>The SA gives consideration to green infrastructure assets and Ancient Woodland under SA objective 5: biodiversity and geodiversity, and the AONBs under SA objective 6: landscape and townscape. Site 59720 receives a significant negative effect in relation to SA objective 5, as it contains green infrastructure assets in the form of woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Site 59720 also receives a significant negative effect in relation to SA objective 6, as it is within the AONB. The effect is recorded as uncertain, as the effects on landscape and townscape will depend on the design, scale and layout of development.</p>
42590337	Annex 1	Site 59613Accessibility is poor, with narrow roads and sharp blind bends.The area identified is higher than the surrounding roads and properties. When we had the Christmas flooding in the village, this entire site area was a 'lake ' for want of a better word. The Snoll Hatch Road had become the river- impassable. If this site was used all that water that was held back would have caused greater flooding damage to the surrounding houses and into the village centre. Bearing in mind this has been an issue twice more then this is more than a 1 in 30 year occurrence.	<p>The Urban Capacity Study (July 2022) was used to inform appraisals under SA objective 2: services and facilities. As site 59613 is recorded in the Urban Capacity Study as falling within the Fair Accessibility Band, it correctly received a minor negative effect in relation to SA objective 2. The SA is too high-level to consider road width, dangerous bends and topography.</p> <p>The SA acknowledges that site 59613 is at risk from flooding, under SA objective 8: water. The site receives a significant negative effect (as part of a mixed effect) in relation to this objective, as it contains land with a 1 in 30 year risk of surface water flooding.</p>
42609057	Annex 1	The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:· 59685· 59690· 59693· 59721· 59805· 59809I object to any development on these sites, for the following reasons:1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.3) The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.4) Local food production is made more important by the effects of climate change.5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.7) Development will lead to a significant loss of biodiversity.8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.9) Development will put even more stress on the already stretched local health and education services.10)	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.Dealing with each site in turn:Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE· The site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE with MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.SA Objective 7: AGREESA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- - should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREESite 59690 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as negative· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this currently unfarmed land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and</p>	<p>objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th561rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE· SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE· Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE· SA Objective 3: DISAGREE - Should be rated as NEGATIVE· Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE· SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE· Site 59809 Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facility. Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42627009	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.Local food production is made more important by the effects of climate change.They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.Development will lead to a significant loss of biodiversity.Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.Development will put even more stress on the already stretched local health and education services.There will be a</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site</p>	<p>Th564rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th565rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site.</p> <p>Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42643873	Annex 1	<p>These comments specifically refer to Green Belt and BMV agricultural land sites 59693, 59721, 59685, 59805, 59809, 59690, but may be applied more generally.</p> <p>REGARDING AFRICULTURAL LAND:</p> <p>* There should be a clearer statement in the Sustainability Appraisal, Sustainability Objectives and Targets against the development of ALL Best, Most Valuable Land as defined by DEFRA. This should include grade 3A land as well as grades 1 and 2. The above sites include, along with grades 1 and 2 land, some grade 3A land which is regularly farmed and which the farmer considers productive. The Placemaker scoring system ignores the presence of grade 3A land.</p> <p>* The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of</p>

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		<p>SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%.</p> <p>SITE 59721: Grade 2 land makes up at least 50% of the site.</p> <p>SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%.</p> <p>I am very concerned that these sites have been amalgamated with the larger Grange Farm (59690) site to make "site" 59805. This has the effect of considerably diluting the % of grades 1 and 2 land on the combined "site". I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging OF sites in this way to reduce the % of grades 1 and 2 land on them could enable all grade 2 land to be developed. THIS WOULD BE A</p>	<p>the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>
42643873	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th568rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is</p>

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		<p>secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I</p>	<p>considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th569rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/</p>

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		<p>would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubb--up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious</p>	<p>walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain</p>

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		<p>flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE
 Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE
 Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA</p>	<p>minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE	
42659905	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn:Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>Th572rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3:</p>

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		<p>rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. 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Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. 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With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a</p>

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		<p>exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and</p>	<p>minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th574rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

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		<p>townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	
42712801	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. TSA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative</p>

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		<p>DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubb--up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective</p>	<p>effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th578rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly</p>

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		<p>6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42712801	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p>

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		<p>on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS</p>	<p>Th581rooforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>Th582rooforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: DISAGREE-- Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: DISAGREE-- Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: DISAGREE-- Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8: DISAGREE-- Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10: DISAGREE-- This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42716961	Annex 1	<p>SITE 59825-- MIXED USEWithin AONB, the Green Belt and adjacent to the Shipbourne Conservation area.SA Objective 1-- Shipbourne Common and the extensive Public Rights of Way leading from the Shipbourne Conservation Area out across the fields and woodland of the AONB to the National Trust and Forestry Commission land, set within the Openness and Permanence of the Green Belt, provide many visitors with an essential well-being and recreational resource. Those unable to access field paths, due to young age or infirmity, tend to enjoy the Common and walk down Upper Green Road and along Back Lane, enjoying the open views to Fairlawne and out to the Forestry of Point Wood/Kiln Wood. Many enjoy the wealth of significant historic houses still set in their plots around the Green emphasising permanence. Mixed Use Development would destroy the views and this openness of the Green Belt and AONB valued by so many, and lead towards urbanisation together with the loss of the night sky enjoyed by many.SA Objectives 8 and 14-- The foul sewer in Back Lane is frequently blocked and overflows into the ditch (last event 3pm 24 Oct 22). Greater impermeable areas due to development will require surface water sewers and may contribute to flooding down-stream. There is no gas in Shipbourne, existing heating is by oil. New development of the scale suggested would need electric</p>	<p>The SA acknowledges site 59825 as being within the AONB and for this reason, receives a significant negative effect in relation to SA objective 6: landscape and townscape. All adverse effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA acknowledges site 59825 as falling within 250m of heritage assets, including Shipbourne Conservation Area, and so receives a significant negative effect in relation to SA objective 7: heritage. All effects against SA objective 7 are recorded as uncertain, as they depend on factor such as the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>heat pumps, car charging points, street lighting, requiring new electric mains supply. Water supply is by the old village Estate mains of small diameter. The A227 / Back Lane junction would need upgrading to safeguard the School. These enabling works will greatly disrupt the highways and costs will be very high. Reg 18 Consultation Doc 1:6:1 states that it is crucial that potential sites are realistically deliverable from a financial perspective...because unviable development means much needed homes will not be delivered...SA Objective 4 - Given the lack of electrical power infrastructure, drainage etc; the rural nature of the lanes off the A227; impact on landscape; business (employment) and housing estate development is totally inappropriate on this site.SA Objective 5 - The Green Belt Study 2016, page 53, clearly and correctly recognises the area designated as AONB, with its ancient woodland, local wild life, TPO's. The Common supported by these open fields and surrounding woodland is host to much bio-diversity. The land is best retained for UK food production following Brexit and need to reduce imports.SA Objective 6 - Mixed development would be contrary to the sub-objective to protect landscape character and quality and cannot be mitigated by design.SA Objective 7 - The Shipbourne Design Statement identifies a number of buildings dating from the 16th century. So far the village is un-marred by Developers Pastiche architecture. Development would be contrary to the sub-objective to protect and enhance historic buildings...landscape.SA Objectives 10 to 12 Any development of this scale would greatly increase traffic movements and be contrary to the Sub-Objective to encourage walking and cycling.</p>	<p>SA objective 1: health and wellbeing looks at the proximity of sites to existing healthcare facilities and areas of open space, in addition to walking and cycling paths, play areas and sports facilities. Site 59825 is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). This is due to the fact it partially overlaps the neighbouring Shipbourne Common open space. In the next iteration of the SA Report, the site will receive a minor positive effect only in relation to SA objective 1. This is due to the fact it is adjacent to this area of open space and within close proximity of walking paths, which will have beneficial effects on new residents health and wellbeing.</p> <p>The SA acknowledges the site as located within 500m of the AONB under SA objective 6: landscape, where the site receives a significant negative effect. All adverse effects against this objective are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Site 59825 does not fall within Flood Zones 2 or 3, and is also not at risk of surface water flooding using data from the Environment Agency. Therefore, the site correctly received a negligible effect in relation to SA objective 8: water. Specific consideration in these site appraisals is not given to foul sewage. The SA is too high-level to consider the gas network, but things like this will instead be considered at planning application stage.</p> <p>SA objective 14 covers housing delivery and as this site would deliver fewer than 100 homes, it receives a minor positive effect. The effect is recorded as uncertain, as the site is proposed for mixed-use development and so it is unknown how much will be designated to residential development as opposed to other uses.</p> <p>SA objective 4 relates to the delivery of employment opportunities and as the site could deliver employment development smaller than 5ha in size, it receives a minor positive effect in relation to SA objective 4: economic growth. The effect is mixed with a negligible effect, as the site is not located near to a train station, bus stop or cycle path.</p> <p>SA objective 5: biodiversity and geodiversity covers the natural environment, not the Green Belt. Green Belt is a policy designation and not an environmental or sustainability designation. The SA incorrectly records the site as containing green infrastructure assets when it does not. This is due to the fact it partially overlaps a green infrastructure asset (Shipbourne Common). The site is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to SA objective 5. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect. The site is located between 250 and 1km of some areas of Ancient Woodland, as acknowledged in the SA. The SA does not give consideration to TPSSs.</p>

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			The SA is too high-level to give consideration to traffic movements, and so the Council will commission additional evidence on this.
42718401	Annex 1	<p>These comments cover Site IDs 59735, 59798, 59801, 59835 and 59804. Site IDs 59735, 59798, 59801, 59804 and 59835 cover a unique area of greenbelt land which sits between Tonbridge, Hildenborough and Shipbourne and has many bridleways and footpaths and so is accessed and enjoyed by horse-riders, cyclists and walkers. Development on these sites would have a devastating impact on the openness and permanence of the greenbelt land between Coldharbour Lane and Horns Lodge Lane. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes. Sites 59801 and 59798 correctly have SA2 assessed as '-' and as such are flagged as least suitable for development. Sites IDs 59735, 59835 and relevant parts of 59804 should be equally scored '-' for SA2 and as such should also be ranked amongst the least suitable. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), climate change (SA11) and local air quality (SA12). Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4 Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>6 Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development. Previous application to move a Dutch barn for stables on to site IDs 59798, 59835 and equivalent section of 59804 was rejected due to impacting the openness of the greenbelt.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>
42720609	Annex 1	<p>Re Local Plan - Site Number 59811 We are residents of TMBC and are formally commenting on the above site which is listed as part of the Local Plan consultation. From the key objectives set out in the Local plan and the Sustainability Appraisal you have carried out for the site, I cannot see how this should even be considered. Just using your own evaluation criteria: - (SA5, SA6, SA7, SA8, SA9) The site would have a devastating impact on the countryside and an extremely biodiverse</p>	<p>The SA is one of many factors that feed into the plan-making process. It does not specifically identify which sites should come forward through allocations in the Local Plan but provides an objective assessment of their sustainability, to help inform Council decisions. Site 59811 receives uncertain significant negative effects in relation to</p>

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		<p>area. It will have a major loss in existing agricultural land and major negative impact on water resources which are already under significant pressure in the l-cal area - (SA2, SA3, SA10) The site is not connected to any existing s-ttlement - the road access all around the site are extremely poor and could not cope even with a small increase in traffic. There are no schools within walking distance, no bus services and no other facilities which could support it. This would lead to a major increase in car traffic, further negatively impacting the GHG impact of the site. Aside from being a large site (which in my view is very negative given all the above), there seems to be no positive impa-t at all - even the economic benefit is shown as negligible as there is nothing in the surrounding area (in fact this will take away existing agricultural employment) We are very opposed to this site for the reasons above and while we cannot believe this is being considered, wanted to make sure we made formal position on this. Happy to provide more context but hopefully the above (and the work you have already done) is clear enough. Kind regards</p>	<p>SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 8: water and 9: soil.</p> <p>The SA acknowledges that the site is not connected to any existing settlement under SA objective 6: landscape and townscape.</p> <p>The SA is too high-level to consider site-specific access points and traffic, and so the Council will commission additional evidence on this.</p> <p>The SA acknowledges that there are no schools within walking distance of the site, bus stops or other relevant services.</p>
42720801	Annex 1	<p>I do not agree to the following sites 59842, 59686, 59637 and 59638 being used for housing. The village of Hadlow does not have the infrastructure to support the increase in housing. Also, by increasing the housing, the main road A26 is already congested with traffic and adding further housing will only add to this congestion. These sites are also green belt. Hadlow has wonderful walks which would be lost if housing were to be built. Not only would it change the vistas and views of Hadlow, but it would impact the environment. The plots in particular provide a collection for ground water both from the surrounding fields, which have flooded in the past and goes against your 'Objective 8. Protect and advance quality of water features'. The function of these sites and utility is also of importance. It feels as if someone looked on Google, saw a village, a few plots of land and said why not build there to accommodate the pressure from government to build more housing. Protect the environment, don't destroy it!</p>	<p>The SA is one of many factors that feed into the plan-making process. It does not specifically identify which sites should come forward through allocations in the Local Plan but provides an objective assessment of their sustainability, to help inform Council decisions.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on this.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Consideration has been given to the effects of development on landscape and townscape, under SA objective 6. Site 59637 receives an uncertain significant negative effect in relation to SA objective 6, as it is not located near any settlements in a rural location, whilst sites 59842 and 59686 receive uncertain minor negative effects as they are located on the edge of a settlement, and so development may be more easily integrated into existing development. Site 59638 is incorrectly recorded as not located near any settlements in a rural location and so incorrectly receives an uncertain significant negative effect. In the next iteration of the SA, the site will receive an uncertain minor negative effect.</p> <p>All sites with the exception of 59686 receive significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. Some of these effects are recorded as uncertain as some of the sites contain water bodies but it is uncertain at this stage what the actual effect development will have on these.</p>
42722017	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: –DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable</p>	<p>Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: educ588roof</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>(BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: -DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields</p>	<p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus589roof</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would</p>	<p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE	
42729569	Annex 1	<p>Site-59071SA1 - I do not see how turning 10ha of orchards into an industrial estate improves human health and well-being. Postern Lane is a popular local footpath for the residents of east -onbridge - much more popular since the Residents' Association installed a bollard to stop cut-through traffic, so that it is much safer for pedestrian use. The pleasure of walkers would be much diminished by bordering the lane with an industrial estate. SA4 - economic growth is only achievable if the site is accessible. This would require substantial infrastructure investment in terms of a link to the A26. There are significant level changes to overcome, as the site slopes steeply. The site may not be deliverable at all. SA5 - orchards are a strong contributor to biodiversity and so the loss of such a large area would have significant negative impact. There is no rational basis for saying that the effect is uncertain; the site's environmental value cannot possibly be conserved, let alone enhanced, by turning it from orchards to industrial use. SA6 and 7 - developing this site would have a significantly negative impact both on the townscape and on cultural heritage. It is critical to understand that because the site slopes, the northern section is prominently visible and developing it would thus have a notable effect. As to cultural heritage, this development would be a grotesque wound to inflict on the area. There are three listed buildings within 250 metres of the site, one of which (The Postern) is Grade 2* listed and has gardens which are classified as a Formal Garden Monument. Another is Postern Forge, listed Grade 2 and dating from the 15th century. According to KCC Heritage Records it "may have been built in 1480 by Thomas Willard, iron master, and was certainly associated with the iron trade for many generations. The forge dam adjoins the house." (Not far to the north lies the remains of Rats Castle Forge, a listed Monument thought to be the second of two medieval iron forges recorded in 1574 and constructed by David Willard. Postern Lane thus has strong historic associations with the medieval Wealden iron industry, which is well-recognised as being of special importance for conservation in the Low Weald.) There are 6 other Grade 2 listed buildings within half a mile. As the above very brief summary shows, Postern Lane is a little corner of the Low Weald which is extraordinarily rich in heritage; Pevsner calls it "A charming and remote-seeming hamlet, though only a mile from Tonbridge. The handsome brick houses of the early C18 make it memorable" ("Pevsner Architectural Guides - The Buildings of England: West Kent and the Weald" (John Newman) (1980) p576). This description is as accurate today as it has been for three centuries. But if this proposal proceeds, the effect will be to bring the urban edge of Tonbridge right up to the edge of the lane and to destroy its historic character forever. Postern Lane will in effect become the new eastern boundary of Tonbridge. The damage would be irreversible and this would be shoddy and unthinking town planning. SA9 - the land has been in productive agricultural use for over half a century. SA10 - developing the site will cause more car and lorry traffic, and more congestion on the A26 which is already forecast to be at saturation</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The SA is too high-level to give consideration to site-specific access points and the topography of individual sites.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is incorrectly recorded as containing green infrastructure assets and therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. This is due to the fact the site overlaps some neighbouring green infrastructure assets and so the GIS analysis recorded the site as containing green infrastructure assets. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective, as it is within 250m of a Local Wildlife Site (East Tonbridge Copses and Dykes and River Medway) and Ancient Woodland. The data used to inform the SA does not identify an orchard. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Further to this, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>The site receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, due to the fact it is on the edge of a settlement and so development may be more easily integrated into existing built development, compared to more rural and isolated sites.</p> <p>With regard to SA objective 7: heritage, the SA acknowledges the site as being within 250m of heritage assets, as recorded in the Kent Historic Environment Record. For this reason, the site receives a significant negative effect. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight.</p> <p>With regard to SA objective 9: soil, the SA acknowledges the site as greenfield and containing a significant proportion of Grade 3 agricultural land. The uncertainty acknowledges the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).</p> <p>SA objective 10: climate change mitigation looks at proximity to public transport and as the site is within 400m of a bus stop, it receives a minor positive effect in relation to SA objective 10. We note that this is only part of the much bigger picture. It is also acknowledged that the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		point. It is obvious, therefore, that development will cause an increase in greenhouse gases. There is no rational basis for the SA to conclude that developing this site is a minor positive in terms of greenhouse gas reduction simply because it is within 400m of a bus stop.The Postern Lane Residents Association submitted a detailed report from the Rural Planning Practice on the last local plan covering this site and the points developed in it remain valid.	actual use of sustainable transport modes will depend on people's behaviour. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.
42729569	Annex 1	Site 59834(The map shows this as including Site 59661 at its eastern edge. I do not know if this is an error or whether the landowners are co-operating. I repeat my comments on Site 59661.)This is a large greenfield site lying entirely within the Green Belt. It is also entirely within flood zone 3 and includes numerous lakes and ponds following gravel exploitation by previous land owners. It is a very significant wildlife habitat. There is no road access (the only road boundary being through Site 59661 onto Postern Lane; Postern Lane is a single track private lane with no access from Vale Road). The map shows an access through the north across the Medway using the route used for gravel extraction; it is not known if the landowner of the access route has agreed to this use. Following that route would mean the construction of a new bridge across the Medway.As a matter of joined-up planning, note that the eastern edge of Site 59834 extends almost as far as the western edge of the new town being proposed by TWBC at Tudeley. If that new town proceeds, then granting permission to Site 59834 would result in Tonbridge all but merging with the new-town.SA4 - economic benefit only flows if the access difficulties can be overcome; they would require massive infrastructure investment.SA5 - destruction on this scale of green belt habitat so rich in wildlife would be an act of gross environmental irresponsibility. Surely this cannot be permitted?SA6 - how could this conceivably be anything other than highly negative for the borough's landscape character and quality? Agricultural land, ancient woodlands and river margin habitat would all be lost.SA8 - destroying a floodplain/river margin habitat is obviously highly detrimental to the quality of water features and resources.SA9 - building on grade 3 agricultural land will not conserve or enhance soil resources.SA10 - on any realistic view this site is remote from public transport and will be entirely dependent on car use; it is bound to increase greenhouse gas emissions.	Site 59661 has been appraised separately to site 59834. Site 59834 contains site 59661 to its south west. The SA acknowledges the fact that site 59661 is greenfield, under SA objective 9: soil. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The SA also acknowledges the site as within Flood Zone 3 under SA objective 8: water and for this reason, in addition to the fact it contains a watercourse, receives a significant negative effect. The effect is recorded as uncertain, as the effects on water quality are uncertain at this stage, as they depend on construction techniques and the use of SuDS within the design. The site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains green infrastructure assets and a Local Wildlife Site (East Tonbridge Copses and Dykes and River Medway), and is within 250m of Ancient Woodland. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The SA is too high-level to give consideration to site-specific access points. The site is incorrectly recorded in the SA as not located near any settlements in a rural location, when it is on the edge of a settlement. Therefore, the site incorrectly receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. In the next iteration of the SA, the site will receive an uncertain minor negative effect. This is due to the fact sites adjacent to existing built development may be more easily integrated into existing built development, compared to more rural and isolated sites. All adverse effects against this objective are recorded as uncertain, as actual effects will depend on the design, scale and layout of development, which may help mitigate adverse effects. With regard to the Agricultural Land Classification, the site contains a less than significant proportion of Grade 3 agricultural land. Therefore, it receives a minor negative effect in relation to SA objective 9: soil.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			The site is within 400m of a bus stop and so received a minor positive effect in relation to SA objective 10: climate change mitigation. We note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.
42746209	Annex 1	<p>Some general points of concern</p> <p>* Inconsistency: Some sites have been give different assessments but the commentary is exactly the same.</p> <p>* Access: It is stated that access to schools or public transport are within a specific distance of the designated sites but this cannot be the case for the whole area of the site.</p> <p>* Local knowledge: Equally, access to a school site may be via a woodland or for public transport to a bus stop with limited services – there is no way that all new residents would use these services.</p> <p>* Health: There is now no GP service in West Malling, the closest is Kings Hill or Leybourne. The Sustainability Objective also conflates health facilities with access to sporting facilities/playgrounds!</p> <p>* Highways: Sustainability Appraisal objectives do not include impact on the local road system.</p> <p>Specific points of concern (by Sustainability Appraisal objective)</p> <p>59594 – 34 houses</p> <p>* Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59602 – 19 houses</p> <p>* Objective 3: We question if this is within 800m of a primary or secondary school.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>The GP surgeries data used to inform the Interim SA Report does not acknowledge that West Malling GP surgery will be closed in the future. In the next iteration of the SA Report, the GP surgery will be removed from the GIS data and the proformas for the sites affected updated.</p> <p>There is considered to be a lot of crossover between access to healthcare facilities and areas of open space and sports facilities, as these can encourage more physical activity with beneficial effects on people's health. The site assessment criteria for SA objective 1: health and wellbeing are considered suitable and appropriate.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The proformas for each site accurately state whether they are within 800m of a primary school or not.</p> <p>The appraisal of site 59603 does not double-count site 59602, which it encompasses. Each of these sites has been appraised separately.</p> <p>With regard to SA objective 9: soils, site 59602 comprises brownfield land. In the next iteration of the SA, the GIS analysis will be updated to reflect this.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA, the justification text will be</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>59603 – 30 houses</p> <p>* Objective 3: We question if this is within 800m of a primary or secondary school.</p> <p>* Objective 9: As this includes site 59602 in its entirety which is classified as greenfield, how can this site be assessed as brownfield?</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size. Does it also double-count the site it encompasses: 59602?</p> <p>59699 – 260 houses</p> <p>* Objective 1: With the closing of West Malling surgery the site is not within 800m of an existing health facility.</p> <p>* Objective 4: The site is not all within 400m of a bus stop, nor would all 260 households be able to use this limited bus service or cycle. It is also unclear what business opportunities this mixed use site would deliver and therefore its impact on the local economy.</p> <p>* Objective 6: This should be significant negative as it will have a major impact on the landscape.</p> <p>* Objective 10: The majority of the site is not within 400m of a bus stop and the bus service is extremely limited – it would increase car/highway movements significantly.</p> <p>59716 – 28 houses</p> <p>* Objective 1: Contradictory, no explanation is given. It can't be both significantly negative and significantly positive.</p> <p>* Objective 10: We question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59733 – 27 houses</p> <p>* Objective 9: Brownfield?</p>	<p>added to the proforma. In accordance with the SA methodology set out in Chapter 2 of the Interim SA Report, sites can have mixed effects.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Objective 10: Majority of site not within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59406 – 20 houses</p> <p>* Objective 2: This should be the same as for site 59596 ie significant negative, as it is immediately next door.</p> <p>* Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative.</p> <p>* Objective 9: We question if this is all brownfield land.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59596 – 23 houses</p> <p>* Objective 3: Stated that this is within 800m distance walking but this would be through woodland, dark at each end of a Winter's day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59648 – 17 houses</p> <p>* Objective 9: We question if this is all brownfield.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59649 – 9 houses</p> <p>* Objective 3: This should be the same as site 59648, ie negative?, as it is immediately next door.</p> <p>* Objective 9: We question if this is all brownfield.</p> <p>* Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42746401	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685, 59690, 59693, 59721, 59805, 59809. I object to any development on these sites, for the following reasons: 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 2) They consist of productive, Best Most Valuable agricultural land (Grades 1, 2, 3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 3) The importance of domestic food production has been highlighted by the recent food shortages caused by Climate Change and the war in Ukraine. 4) Local food production is made more important by the effects of climate change. 5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. 6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. 7) Development will lead to a significant loss of biodiversity. 8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. 9) Development will put even more stress on the already stretched local health and education services. 10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. 11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1: –DISAGREE - Should be rated as NEGATIVE. Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3: –DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE. Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5: –DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE. Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6: –DISAGREE - Should be rated SIGNIFICANT NEGATIVE. Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8: –DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE. Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10:–DISAGREE - should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1:–DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site–IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10:–DISAGREE - This should be rated as negative· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREESA Objective 3:–DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREESA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a</p>	<p>positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus598roof</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10:-DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1:-DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREESA Objective 3:-DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.SA Objective 4: AGREESA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this currently unfarmed land WILL significantly diminish biodiversity.· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10:-DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1:-DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.· Although public footpaths cross the site, development would destroy their value.SA Objective 2-AGREESA Objective 3: DISAGREE - Should be rated as NEGATIVE· Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local</p>	<p>Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>facilities.SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site-IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1:-DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10:-DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE</p>	
42776289	Annex 1	<p>On behalf of our client, CEMEX UK Properties Ltd, please find enclosed representations to Tonbridge & Malling Borough Council's (hereafter referred to as 'the Council') Regulation 18 Local Plan (the 'Local Plan').</p> <p>CEMEX supports the decision to bring forward a new Local Plan as the importance of creating a Plan-led approach to planning for development cannot be understated given the Council's adopted Local Plan predates the National Planning Policy Framework ('NPPF'). A new Local Plan is therefore required to ensure the future needs of residents and businesses across the Borough can be met through the sustainable development of sites.</p> <p>These representations are consistent with those made to the previous iteration of the Local Plan that was withdrawn on 13th July 2021 and included submissions to the Regulation 18 (The Way Forward) in November 2016 and the Regulation 19 draft in November 2018. As part of the initial stage of the emerging Local Plan, the three sites as set out below were also submitted to the Council's first Call for Sites exercise in February 2022.</p> <p>CEMEX is a global building materials company and leading supplier of cement, ready-mixed concrete and aggregates. In the UK, CEMEX owns sites and land that have ceased to be in operational uses and where appropriate, these are now promoted for alternative uses some of which are in Aylesford and the extent of their ownership is shown on the plan below and is split into three sites:</p> <p>Site A – extends to approximately 8.2ha;</p> <p>Site B – extends to approximately 9.7ha; and</p> <p>Site C – extends to approximately 0.6ha.–</p> <p>To note - the plan showing the location of the sites are included within the submission sent to the Council (localplan@tmbs.gov.uk (mailto:localplan@tmbs.gov.uk)).</p> <p>DEVELOPMENT POTENTIAL</p> <p>As part of the adopted Development Plan, the area around Eccles was designated as within the Bushey Wood Area of Opportunity - Core Strategy Policy CP16 and this stated:</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report. This means that each reasonable alternative development site option is appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondents comments on SA objective 1: health and wellbeing, housing provision is dealt with separately under SA objective 14: housing. Although the respondent has said that development will incorporate areas of public open space, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p> <p>With regard to SA objective 2: services and facilities, sites 59766 and 59763 are recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band and therefore receives a significant negative effect against this objective.</p> <p>With regard to SA objective 3: education, site 59766 receives an uncertain minor negative effect for the reasons outlined in the proforma. Although the respondent has said that financial contributions would be made to mitigate any likely impact of the site in respect of education provision, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, sites 59766 and 59763 receive uncertain significant negative effects as they form part of a Regionally Important Geological Site (Aylesford Pit) and are within close proximity of a locally designated site (Eccles Old Pits Local Wildlife Site). Although the respondent has said that the sites would deliver at least a 10% net gain in biodiversity, these are 'policy-off' appraisals that do not take into consideration mitigation. With regard to SA objective 6: landscape, sites 59766 and 59763 are recorded as uncertain significant negative because they are not located within or on the edge of a settlement. The uncertainty is due to the fact the actual effect will depend on the final design, scale and layout of development. Although the respondent has said that there would be a robust landscaping strategy, these are 'policy-off' appraisals that do not take into consideration mitigation.</p> <p>With regard to SA objective 7: historic environment, these are 'policy-off' appraisals that do not take into consideration mitigation. Sites 59766 and 59763 receive uncertain significant negative effects in relation to this objective because they contains and are located within</p>

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		<p>"Land at Bushey Wood is identified as an Area of Opportunity containing land with potential for meeting residential needs in the post 2021 period, or earlier if there is any significant shortfall in strategic housing provision. Land will only be released for housing development within the Area of Opportunity through the preparation of an Area Action Plan. In the meantime, development will not be proposed in the LDF or otherwise permitted within this area which might prejudice its long-term development potential."</p> <p>In consideration of the position set by the Core Strategy, the withdrawn Local Plan had continued with land at Eccles/Bushey Wood forming part of the preferred spatial approach for development and within the associated evidence base, CEMEX's landholding (as set out above) were included as part of the Strategic Land Availability Assessment ('SLAA') reference 199 – Bushey Wood. This Report concluded that Bushey Wood was:</p> <p>"located in a sustainable location, with good access to services. The site is a mixture of greenfield and previously developed land, and any development should seek to maximise PDL opportunities. The majority of the site is identified as an Area of Opportunity in the adopted development plan for residential development post 2021, and therefore the principle of development in this location is already established. The scale of the site would enable a range of infrastructure, open space, and affordable housing to be provided on-site to meet a range of local plan and sustainability appraisal objectives over the medium to long term, as well as potential for further development beyond this plan period".</p> <p>As set out in previous representations and repeated through the 2022 Call for Sites, in consideration that each of the sites are deliverable in that they are available (single landowner), suitable (conclusions of previous Sustainability Appraisal/SLAA) and achievable (realistic prospect that housing will be delivered within five years), it is considered that they should be allocated in the emerging Local Plan/form part of the strategic extension to Eccles.</p> <p>Further, with the current planning application (22/00113/OAEA) which includes land that would adjoin Sites B and C, in order for the Council to maximise the delivery of housing at sustainable locations (as confirmed through the previous evidence base), we suggest both sites (B and C) should be allocated in the emerging Local Plan.</p> <p>The Sites are assessed under references 59766 (Site A), 59763 (Site B) and 59768 (Site C) and there are some parts of the Interim Sustainability Appraisal Site Assessments that we agree and support,</p>	<p>close proximity of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, site 59766 receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. Further to this, the site partially overlaps a water body in Bushey Wood and therefore development of the site could have an adverse effect on water quality, although this is uncertain. Site 59763 also receives an uncertain significant effect as it is within an area with a 1 in 30 year risk of surface water flooding. The site does not contain a water body or watercourse, but partially falls within Source Protection Zone 3. Although the respondent has said that the scheme could include SuDS and other mitigation, these are 'policy-off' appraisals that do not take into consideration mitigation. With regard to SA objective 10: climate change mitigation, although the respondent has said that there could be opportunities to deliver a new bus service, this is a 'policy-off' appraisal that does not take into consideration mitigation.</p>

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		<p>whilst others we consider incorrect. Our comments on the relevant objectives (that we do not agree with) are outlined below.</p> <p>Site A: 59766</p> <p>SA Objective 1:</p> <p>To improve human health and well-being</p> <p>The proposal would facilitate improved health and well-being by providing much needed housing, and in particular affordable housing which helps to reduce deprivation and social inequalities.</p> <p>As set out within these representations, the Site was also within a previously assessed 'Area of Opportunity' and concluded to be sustainable by the Council (as part of the evidence base of the last Local Plan.</p> <p>In terms of the development of the Site, it would include areas of public open space in accordance with planning policy. It is also relevant to note that should the planning application (22/00113/OAEA) be approved, there would be opportunities for residents to use the associated areas (alongside the development of Site A providing contributions to enhance further and/or deliver additional services/facilities in the local area).</p> <p>There would also be opportunities to improve connections to a wider network of green spaces to promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.</p> <p>We therefore suggest the Site is scored '++' (significant positive effect likely) rather than + (minor positive effect likely).</p> <p>SA Objective 2:</p> <p>To improve equality and access to community facilities and services</p> <p>Given the Council's assessment in respect of SA Objective 1 and our subsequent re-assessment, we suggest the Site is scored '+' (minor positive effect likely) rather than - (significant negative effect likely).</p>	

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		<p>SA Objective 3:</p> <p>To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>The necessary financial contributions would be made to mitigate any likely impact of the Site in respect of education provision.</p> <p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (-?) Uncertain minor negative.</p> <p>SA Objective 5:</p> <p>To protect and enhance biodiversity and geodiversity</p> <p>In accordance with the emerging Local Plan alongside the legislation within the Environment Act, the development of the Site would need to deliver at least a 10% net gain in biodiversity.</p> <p>As part of bringing forward the biodiversity net gain strategy/plan, in accordance with the NPPF (paragraph 180), it would also be necessary to apply the avoidance strategy. This will ensure biodiversity and geodiversity is protected and enhanced.</p> <p>We therefore suggest the Site is scored '++' (significant positive effect likely) rather than (--?) Uncertain significant negative.</p> <p>SA Objective 6:</p> <p>To protect and enhance the borough's landscape and townscape character and quality</p> <p>Whilst the character of the Site would change (development of a greenfield site), with a robust landscaping strategy and careful layout, it is suggested that the long-term impact would be minimal/negligible.</p> <p>We therefore suggest the Site is scored '-' (minor negative effect) rather than (--?) Uncertain significant negative.</p>	

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		<p>SA Objective 7:</p> <p>To protect and enhance the cultural heritage resource</p> <p>Ensuring the setting of the Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles would not be harmed would form a key component of the layout of the Site.</p> <p>It is suggested with the intervening Bushey Wood alongside additional mitigation that would be incorporated into the development, the heritage asset would not be affected.</p> <p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--?) Uncertain significant negative.</p> <p>SA Objective 8:</p> <p>To protect and enhance the quality of water features and resources</p> <p>None of the Site is within Flood Zone 3, rather, the entirety is within Flood Zone 1 – the area with the lowest probability of flooding. The area to the west also benefits from flood defences.</p> <p>As part of the development of the Site, a strategy would be developed that ensured the surrounding area would not be affected. This could include SUDs and other mitigation on-site.</p> <p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--) Significant negative/ (--?) Uncertain significant negative.</p> <p>In light of the above, we consider the Interim Sustainability Assessment Report scores for the Objectives as listed above should be higher than that set out within the assessment. We therefore request the Interim Sustainability Appraisal for Site A is reviewed by the Council and amended in accordance with the above.</p> <p>Site B: 59763</p> <p>SA Objective 1:</p>	

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		<p>To improve human health and well-being</p> <p>The proposal would facilitate improved health and well-being by providing much needed housing, and in particular affordable housing which helps to reduce deprivation and social inequalities.</p> <p>As set out within these representations, the Site was also within a previously assessed 'Area of Opportunity' and concluded to be sustainable by the Council (through the previous Local Plan).</p> <p>In terms of the development of the Site, it would include areas of public open space in accordance with planning policy. It is also relevant to note that should the planning application (22/00113/OAEA) be approved, there would be opportunities for residents to use the associated areas (alongside the development of Site A providing contributions to enhance further and/or deliver additional services/facilities in the local area).</p> <p>There would also be opportunities to improve connections to a wider network of green spaces to promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.</p> <p>We therefore suggest the Site is scored '++' (significant positive effect likely) rather than + (minor positive effect likely).</p> <p>SA Objective 2:</p> <p>To improve equality and access to community facilities and services</p> <p>Given the Council's assessment in respect of SA Objective 1 and our subsequent re-assessment, we suggest the Site is scored '+' (minor positive effect likely) rather than – (significant negative effect likely).</p> <p>SA Objective 3:</p> <p>To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>The necessary financial contributions would be made to mitigate any likely impact of the Site in respect of education provision.</p>	

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		<p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (-?) Uncertain minor negative.</p> <p>SA Objective 5:</p> <p>To protect and enhance biodiversity and geodiversity</p> <p>In accordance with the emerging Local Plan alongside the legislation within the Environment Act, the development of the Site would need to deliver at least a 10% net gain in biodiversity.</p> <p>We therefore suggest the Site is scored '++' (significant positive effect likely) rather than (--?) Uncertain significant negative.</p> <p>SA Objective 6:</p> <p>To protect and enhance the borough's landscape and townscape character and quality</p> <p>Whilst the character of the Site would change (development of a greenfield site), with a robust landscaping strategy and careful layout, it is suggested that the long-term impact would be minimal/negligible.</p> <p>We also suggest that should the planning application (22/00113/OAEA) to the north be permitted, the development of the Site (which would adjoin the Site to the north) would be seen in the context of Eccles/the existing built form.</p> <p>We therefore suggest the Site is scored '-' (minor negative effect) rather than (--?) Uncertain significant negative.</p> <p>SA Objective 7:</p> <p>To protect and enhance the cultural heritage resource</p> <p>Ensuring the setting of the Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles would not be harmed would form a key component of the layout of the Site.</p>	

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		<p>It is suggested with the intervening Bushey Wood to the northwest alongside additional mitigation that would be incorporated into the development, the heritage asset would not be affected.</p> <p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--?) Uncertain significant negative.</p> <p>SA Objective 8:</p> <p>To protect and enhance the quality of water features and resources</p> <p>None of the Site is within Flood Zone 3, rather, the entirety is within Flood Zone 1 – the area with the lowest probability of flooding.</p> <p>As part of the development of the Site, a strategy would be developed that ensured the surrounding area would not be affected. This could include SUDs and other mitigation on-site.</p> <p>We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--) Significant negative/ (--?) Uncertain significant negative.</p> <p>SA Objective 10:</p> <p>To reduce greenhouse gas emissions so as to minimise climate change</p> <p>Whilst the Site is more than 800m from a railway station and 400m from a bus stop, with the critical mass that may come forward (in this area), there could be opportunities (in discussions with the local bus provider) to deliver a new bus service.</p> <p>We therefore suggest that the Site is scored '?' (Likely effect uncertain) rather than (-).</p> <p>In light of the above, we consider the Interim Sustainability Assessment Report scores for the Objectives as listed above should be higher than that set out within the assessment. We therefore request the Interim Sustainability Appraisal for Site B is reviewed by the Council and amended in accordance with the above.</p>	

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		<p>Site C: 59768</p> <p>Given the size and proximity of Site C, we have not provided a re-assessment.</p>	
42784385	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: –DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: educ609roof</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8:</p>

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		<p>Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: -DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and</p>	<p>water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus610roof</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not</p>

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		<p>Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regul-ly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: - DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: - DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Practical</p>	<p>located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from</p>

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		<p>access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: - DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable</p>	<p>proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		(BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE	
42784417	Annex 1	<p>59731</p> <p>Comment for Objection to inclusion of site 59731 (& 59707)</p> <p>The key objections are based on:</p> <ul style="list-style-type: none"> * Development on Green Belt land resulting in urban sprawl without evidence of extraordinary circumstances required to do so. Green belt exists to check the unrestricted sprawl of large built-up areas and prevents neighbouring towns merging into one another. It is also required to safeguarding the countryside from encroachment. * Development within an Area of Outstanding Natural Beauty. * Development would affect the openness and visual amenity of and across the location would be severely compromised. This site offers extensive views across the AONB. * The Green Belt setting preserves the setting and special character of a historic settlement: The Conservation Area extends into the Green Belt, and the AONB also helps serve this function. * Overdevelopment of an existing community and services, increased traffic and demand on existing services. <p>Planning Policy to support the above objections</p> <p>NPPF 2021 Section 13 Protecting Green Belt land</p> <p>The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p>Paragraph 137</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA gives consideration to the AONBs and if a site is within 500m of an AONB, it receives a significant negative effect in relation to SA objective 6: landscape and townscape. The effect is recorded as uncertain, as the actual effect will depend on the design, scale and layout of development, which may help mitigate any adverse effects. Sites 59731 and 59707 therefore receive uncertain significant negative effects in relation to SA objective 6.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1: services and facilities do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to school capacity, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is too high-level to give consideration to traffic and so the Council will commission additional evidence on this.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+)</p>

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		<p>Green Belt serves five purposes:</p> <ul style="list-style-type: none"> * to check the unrestricted sprawl of large built-up areas; * to prevent neighbouring towns merging into one another; * to assist in safeguarding the countryside from encroachment; * to preserve the setting and special character of historic towns; and * to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. <p>Paragraph 147</p> <p>Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</p> <p>Paragraph 148</p> <p>When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.</p> <p>Paragraph 149</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:</p> <ul style="list-style-type: none"> * a) buildings for agriculture and forestry; * b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; <p>NPPF 2021 Section 3, 16a A legal requirement of the plan is that a site should be prepared with the objective of contributing to the achievement of sustainable development</p>	<p>effect is recorded for site options that would provide fewer than 100 dwellings". As site 59731 is proposed for 100 dwellings or more, it receives a significant positive effect in relation to SA objective 14: housing.</p> <p>With regard to the natural environment, site 59731 receives a minor negative effect as it is within 250m and 1km of Halling to Trottiscliffe Downs SSSI, two Local Wildlife Sites (Wrotham Hill and Wrotham Downs) and an area of Ancient Woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to the historic environment, site 59731 receives a significant negative effect as it is within 250m of a heritage asset, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>

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		<p>The score for this site is negative, Further consideration of the objectives will reduce this score further,</p> <p>Objective 3 (++)-To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>-The local primary schools (in Wrotham and Borough Green) are currently close to capacity and regularly have waiting lists for admissions. Both the primary school sites have traditionally constructed buildings that have been expanded over the years and would need significant changes to accommodate more pupils.</p> <p>- The local secondary school is frequently oversubscribed pupil numbers have already increased from 140 (in 2016) to 190 (in 2021).</p> <p>- There is a specialist school local to the area, although admission is limited to children with a KCC care plan and is fully subscribed.</p> <p>- Nursery/childcare facilities in the locality all have long waiting lists (often in excess of twelve months for pre-school children)</p> <p>- No further educational facilities are available outside of the local secondary school.</p> <p>Multiple housing developments are proposed in the locality, it will not be possible for them to utilise these facilities.</p> <p>NPPF 2021 Section 8 Promoting healthy and safe communities paragraph 95</p> <p>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive collaborative approach to meeting this requirement, and to development that will widen choice in education.</p>	

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		<p>Objective 14 (++) To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures.</p> <p>- The density of housing proposed on this site will not provide high quality housing proportionate to the character and or scale of the existing settlement abutting the proposed site. This is contrary to clause (5.9.20) The affordable housing necessary is not met.</p> <p>NPPF 2021 Section 20d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</p> <p>This site is located within The Green Belt, within an “Area of Outstanding Natural Beauty”, has the highest grade of agricultural land (grade 1) and falls outside of the rural settlement of Wrotham and it is open countryside. The plan describes a requirement to “safeguard green spaces”, a development in this location does not protect, or conserve the natural asset of the environment or heritage of the surrounding conservation area. A development on this site will ruin the visual amenity of the area.</p> <p>Exceptional circumstances are not applicable to this site. The number of properties could be accommodated in other locations. The development of 105 houses is not sufficient justification to build on this land.</p> <p>Other objections to the proposals</p> <p>Kent Downs AONB Management Plan 2021-2026</p> <p>An Area of Outstanding Natural Beauty (AONB) is exactly what it says it is: a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them.</p>	

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		<p>The historic settlement pattern remains an important distinctive component of the AONB.</p> <p>* Major development should avoid the Kent Downs AONB in line with NPPF guidance. Where it is decided that development will take place that will have a negative impact on the landscape character, characteristics and qualities of the Kent Downs AONB or its setting, mitigation and or compensatory measures appropriate to the national</p> <p>* Aside from these grand and dominant historic sites and structures, the multitude of smaller cultural and historic features also help characterise the landscape of the AONB. These are the traces of ordinary people who have worked the land for centuries and have shaped its special character. Networks of ancient, often 'laid' hedgerows which still provide enclosure for livestock; wood and field banks which marked boundaries between different manors or estates, picked out with pollarded or 'stubbed' ancient trees; field patterns and lynchets revealing ploughing patterns from centuries ago; hollow ways and sunken lanes, now often byways, carved into the land by millennia of passing feet and hooves; and dene holes (deep excavations into the chalk) and borrow pits where rock and minerals were excavated by hand</p> <p>* The historic environment helps shape new development in the AONB and its setting and contributes to a distinctive sense of place. This will be achieved by ensuring that the heritage is considered from the earliest stages of project development.</p> <p>PPG2</p> <p>PPG2: Green Belts – this sets out the Government's policy for Green Belts which is to maintain their openness. It indicates that Green Belt boundaries should endure for the long-term and that there is a presumption against inappropriate development within Green Belts I</p> <p>It is possible to find alternative locations for developments of this size, throughout the borough without compromising the AONB.</p>	
42784417	Annex 1	<p>Site 59707 Comment for Objection to inclusion of site 59731 (& 59707) The key objections are based on: Development on Green Belt land resulting in urban sprawl without evidence of extraordinary circumstances required to do so. Green belt exists to check the unrestricted sprawl of large built-up areas and prevents neighbouring towns merging into one another. It is also required to safeguarding</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>the countryside from encroachment. Development within an Area of Outstanding Natural Beauty. Development would affect the openness and visual amenity of and across the location would be severely compromised. This site offers extensive views across the AONB. The Green Belt setting preserves the setting and special character of a historic settlement: The Conservation Area extends into the Green Belt, and the AONB also helps serve this function. Overdevelopment of an existing community and services, increased traffic and demand on existing services. Planning Policy to support the above objections NPPF 2021 Section 13 Protecting Green Belt land The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Paragraph 137 Green Belt serves five purposes: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Paragraph 147 Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 149 A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are: <li a) buildings for agriculture and forestry; <li b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; NPPF 2021 Section 3, 16a A legal requirement of the plan is that a site should be prepared with the objective of contributing to the achievement of sustainable development The score for this site is negative, Further consideration of the objectives will reduce this score further, Objective 3 (++)-To improve levels of educational attainment and skills and training development for all age groups and all sectors of society -The local primary schools (in Wrotham and Borough Green) are currently close to capacity and regularly have waiting lists for admissions. Both the primary school sites have traditionally constructed buildings that have been expanded over the years and would need significant changes to accommodate more-pupils. - The local secondary school is frequently oversubscribed pupil numbers have already increased from 140 (in 2016) to 190 (i- 2021). - There is a specialist school local to the area, although admission is limited to children with a KCC care plan and is fully sub-cribed. - Nursery/childcare facilities in the locality all have</p>	<p>The SA gives consideration to the AONBs and if a site is within 500m of an AONB, it receives a significant negative effect in relation to SA objective 6: landscape and townscape. The effect is recorded as uncertain, as the actual effect will depend on the design, scale and layout of development, which may help mitigate any adverse effects. Sites 59731 and 59707 therefore receive uncertain significant negative effects in relation to SA objective 6.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1: services and facilities do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to school capacity, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is too high-level to give consideration to traffic and so the Council will commission additional evidence on this.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". As site 59731 is proposed for 100 dwellings or more, it receives a significant positive effect in relation to SA objective 14: housing.</p> <p>With regard to the natural environment, site 59731 receives a minor negative effect as it is within 250m and 1km of Halling to Trottscliffe Downs SSSI, two Local Wildlife Sites (Wrotham Hill and Wrotham Downs) and an area of Ancient Woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this</p>

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		<p>long waiting lists (often in excess of twelve months for pre-school children) - No further educational facilities are available outside of the local secondary school. Multiple housing developments are proposed in the locality, it will not be possible for them to utilise these facilities. NPPF 2021 Section 8 Promoting healthy and safe communities paragraph 95 It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive collaborative approach to meeting this requirement, and to development that will widen choice in education. Objective 14 (++) To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and –enures. - The density of housing proposed on this site will not provide high quality housing proportionate to the character and or scale of the existing settlement abutting the proposed site. This is contrary to clause (5.9.20) The affordable housing necessary is not met. NPPF 2021 Section 20d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation. This site is located within The Green Belt, within an “Area of Outstanding Natural Beauty”, has the highest grade of agricultural land (grade 1) and falls outside of the rural settlement of Wrotham and it is open countryside. The plan describes a requirement to “safeguard green spaces”, a development in this location does not protect, or conserve the natural asset of the environment or heritage of the surrounding conservation area. A development on this site will ruin the visual amenity of the area. Exceptional circumstances are not applicable to this site. The number of properties could be accommodated in other locations. The development of 105 houses is not sufficient justification to build on this land. Other objections to the proposals Kent Downs AONB Management Plan 2021-2026 An Area of Outstanding Natural Beauty (AONB) is exactly what it says it is: a precious landscape whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. The historic settlement pattern remains an important distinctive component of the AONB. <ol Major development should avoid the Kent Downs AONB in line with NPPF guidance. Where it is decided that development will take place that will have a negative impact on the landscape character, characteristics and qualities of the Kent Downs AONB or its setting, mitigation and or compensatory measures appropriate to the national <ol start="2</p> <p>Aside from these grand and dominant historic sites and structures, the multitude of smaller cultural and historic features also help characterise the landscape of the AONB. These are the traces of ordinary people who have worked the land for centuries and have shaped its special character. Networks of ancient, often ‘laid’ hedgerows which still provide enclosure for livestock; wood and field banks which marked boundaries between different manors or estates, picked out with pollarded or ‘stubbed’ ancient trees; field patterns and lynchets revealing ploughing patterns from centuries ago; hollow ways and sunken lanes, now often byways, carved into the land by</p>	<p>strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to the historic environment, site 59731 receives a significant negative effect as it is within 250m of a heritage asset, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>millennia of passing feet and hooves; and dene holes (deep excavations into the chalk) and borrow pits where rock and minerals were excavated by hand The historic environment helps shape new development in the AONB and its setting and contributes to a distinctive sense of place. This will be achieved by ensuring that the heritage is considered from the earliest stages of project development. PPG2 PPG2: Green Belts – this sets out the Government’s policy for Green Belts which is to maintain their openness. It indicates that Green Belt boundaries should endure for the long-term and that there is a presumption against inappropriate development within Green Belts I It is possible to find alternative locations for developments of this size, throughout the borough without compromising the AONB.</p>	
42784705	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: –DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: educ620roof</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA</p>

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		<p>NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site</p>	<p>Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus621roof</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3:</p>

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		<p>59693 (Residential) SA Objective 1: –DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regul-ly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:–DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: –DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:–DISAGREE - This should be</p>	<p>education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered</p>

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		<p>rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: – DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3:–DISAGREE - Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:–DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:–DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: – DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:–DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:–DISAGREE - Should be</p>	<p>under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE</p>	
42802017	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809 I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: educ624roof</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the</p>

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		<p>motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1: -DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as negative Bus services are inadequate for current needs and any development on this site would</p>	<p>frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

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		<p>therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1: -DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regul-ly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1: - DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1: – DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3:-DISAGREE - Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1: – DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5:-DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and</p>	<p>unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8:-DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10:-DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREEGreen Belt LandThe Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.** Rather all other options should be considered first.Best Most Valuable Agricultural Land (BMV)There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p>	<p>take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p>
42803233	Annex 1	<p>Comments in relation to site 59641. SA Objective 1: agree, as only minor positive.SA Objective 2: significant negative. Poor accessibility. SA Objective 3: significant negative due to poor accessibility, distance, low capacity, need to rely excessively on private</p>	<p>Proximity to schools is covered under SA objective 3: education, not SA objective 2: services and facilities. Site 59641 receives a minor negative effect in relation to SA objective 3, as it is not within 800m of a primary or secondary school. The effect is uncertain, as new</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>transportation and as a result increased traffic and pollution. The site is far off existing secondary school and primary schools, their existing capacity already below what is required. Primary school-age children will need to be driven significant distance to schools with existing capacity. The commute may affects their performance and social life (ability to mix with fellow school children after classes). It increases traffic and pollution. Even if local primary school places became available, walking will not be an option for young children. Older children may attempt walking to the local secondary schools but there are no pedestrian pathways; the only option is along a narrow and windy single-file car lane, which is dangerous for the traffic, and unlit, making it largely unsuitable. For older children attaining secondary schools further away, commute will be substantive, and involve a long walk or ride to the nearest bus stops/Tonbridge railway station, all of which are significant distance away. Increased reliance on private transportation will increase pollution, and make already unsafe road considerably more unsafe, for either walking or driving. SA Objective 4: negative. Due to poor accessibility economic/development benefits are doubtful. Development would impact the existing green belt and thus impact long-term economic benefits of the wider area. SA Objective 5: significant negative. Essential facilities are also limited or missing, and extending them from the urban area would cause environmental effects along the way. Amongst other, there are no sewage mains. If not extended (at the said risk), the alternative solution are local installations, like septic tanks, that are riskier in environmental terms and higher maintenance/less efficient. SA Objective 6: significant negative. The site is next to protected area. Extending communications/essential facilities (as above) will impact landscape. SA Objective 7: significant negative. As above. SA Objective 8: significant negative. As above. SA Objective 9: significant negative. As above (the effects of extending the existing remote or installing new facilities). SA Objective 10: significant negative. As above, increased traffic and-pollution - irrespective of children's educational needs, significant reliance on private transportation will be inevitable, due to poor accessibility and absence of public transportation facilities in the proximity.</p>	<p>residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities rather than access to employment opportunities. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59641 receives a minor negative effect against SA objective 5: biodiversity and geodiversity, as it is within 250m of a Local Nature Reserve (Haysden Nature Reserve). All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Site 59641 receives a significant negative effect against SA objective 6: landscape and townscape, as it is not located near any settlements in a rural location. All adverse effects against this objective are recorded as uncertain, as actual effects on landscape and townscape will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The site also receives a significant negative effect in the SA in relation to the historic environment. The site is within 250m of heritage assets, as recorded in the Kent Historic Environment Record, and so receives a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The site receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding and contains a watercourse. The effect is recorded as uncertain, as development could affect water quality, although this is dependent on construction techniques and the use of SuDS within the design.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>The site receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield and contains Grade 3 agricultural land. The effect is recorded as uncertain, as it is unknown whether the Grade 3 agricultural land is Grade 3a (high quality) or 3b (not classed as high quality).</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. Site 59641 receives a negligible effect in relation to this objective, as it is not within close proximity of a railway station or bus stop, but is close to a cycle path. The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p>
42812385	Annex 1	Regarding site 59803, no part of the site is within 800m (as the crow flies) from the only vehicle/pedestrian entry to the station car park (from Bow Road), and less than 2% of the site area is within 800m of the pedestrian entrance from the car park to the station platforms (again, as the crow flies). As entry to the station premises can ONLY be gained from Bow Road it is disingenuous to state that the site is within 800m of the station, since a distance considerably in excess of 800m must be travelled to the Bow Road entry point (even for a crow). When considering that it is not possible to walk in a direct straight line to the station, the distance from the extremity of the site to the station ticket machine and platforms is circa 1900m. Therefore please adjust the SA10 assessment for this site accordingly.	As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distance from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.
42828769	Annex 1	The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685, 59690, 59693, 59721, 59805, 59809. I object to any development on these sites, for the following reasons: 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 2) They consist of productive, Best Most Valuable agricultural land (Grades 1, 2, 3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 3) The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. 4) Local food production is made more important by the effects of climate change. 5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. 6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. 7) Development will lead to a significant loss of biodiversity. 8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. 9) Development will put even more	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>stress on the already stretched local health and education services.10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.Dealing with each site in turn:Site 59685 (Mixed use)SA Objective 1– DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREESA Objective 3– DISAGREE - Should be rated as NEGATIVE· The site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE with MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.SA Objective 7: AGREESA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10– DISAGREE - should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREESite 59690 (Mixed use)SA Objective 1– DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The sit– IS located next to</p>	<p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as negative· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1- DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this currently unfarmed land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey,</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu632roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

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		<p>registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE- There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE- Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY- The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as NEGATIVE- Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREESite 59805 (Mixed use)SA Objective 1- DISAGREE - Should be rated as NEGATIVE- Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3- DISAGREE - Should be rated as NEGATIVE- Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE but should be MINOR POSITIVE- Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE- Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE- The sit- IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE- Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY- The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10: DISAGREE - This should be rated as NEGATIVE- Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13:</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>AGREESite 59809 Mixed use)SA Objective 1– DISAGREE - Should be rated as NEGATIVE· Site is NOT within 800m of existing healthcare facility· Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE· Loss of this agricultural land WILL significantly diminish biodiversity· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREESA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10– DISAGREE - This should be rated as NEGATIVE· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>
42834945	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:• 59685• 59690• 59693• 59721• 59805• 59809I object to any development on these sites, for the following reasons:1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.3) The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.4) Local food production is made more important by the effects of climate change.5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.7) Development will lead to a significant loss of biodiversity.8) Development will irrevocably alter the open, semi-rural, low-density</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare</p>

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		<p>character of north Tonbridge.9) Development will put even more stress on the already stretched local health and education services.10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.Dealing with each site in turn: Site 59685 (Mixed use)SA Objective 1– DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE• SA Objective 3– DISAGREE - Should be rated as NEGATIVE. • The site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE with MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. • This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE• Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.SA Objective 7: AGREE• SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. • The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10– DISAGREE - should be rated as NEGATIVE• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59690 (Mixed use)SA Objective 1– DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility. • Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE• SA Objective 3: AGREE• SA Objective 4: AGREE but should be MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. • This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective</p>	<p>is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu635roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is</p>

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		<p>6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• The sit- IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as negative• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59693 (Residential)SA Objective 1- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of an existing secondary or primary school.SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as NEGATIVE• Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1- DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility.SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this currently unfarmed land WILL</p>	<p>incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu636roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated</p>

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		<p>significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE. There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE. Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY. The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as NEGATIVE. Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use) SA Objective 1- DISAGREE - Should be rated as NEGATIVE. Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective -: AGREE SA Objective 3: DISAGREE - Should be rated as NEGATIVE. Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE. Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE. Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE. The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE. Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY. The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10: DISAGREE - This should be rated as NEGATIVE. Bus services are inadequate for current needs and any development on</p>	<p>sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site</p>

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		<p>this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Site 59809 Mixed use)SA Objective 1- DISAGREE - Should be rated as NEGATIVE• Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value.SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE• Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE• Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE• Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.SA Objective 9: AGREE STRONGLY• The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.SA Objective 10- DISAGREE - This should be rated as NEGATIVE• Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.SA Objectives 11,12,13: AGREE Green Belt LandThe Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt? Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply. Rather all other options should be considered first.Best Most Valuable Agricultural Land (BMV)There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications. This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the</p>	<p>59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>

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		<p>economic necessity of food production at home. The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site. It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land. ** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site. Site Specific Comments with regard to BMV SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%. SITE 59721: Grade 2 land makes up at least 50% of the site. SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%. SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. ** This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	
42835361	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees: 59685 59690 59693 59721 59805 59809. I object to any development on these sites, for the following reasons: They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. Local food production is made more important by the effects of climate change. They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. Development will lead to a significant loss of biodiversity. Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. Development will put even more stress on the already stretched local health and education services. There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. Dealing with each site in turn: Site 59685 (Mixed use) SA Objective 1:- DISAGREE - Should be</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3:</p>

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		<p>rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE. The site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE with MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59690 (Mixed use) SA Objective 1:- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREESA Objective 3: AGREESA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA</p>	<p>education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a</p>

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		<p>Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as negative Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59693 (Residential) SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREESA Objective 3- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regu-rly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59721 (Residential)SA Objective 1:- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. SA Objective 4: AGREE SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this currently unfarmed land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8-</p>	<p>minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu641roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

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		<p>DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59805 (Mixed use)SA Objective 1:- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3- DISAGREE - Should be rated as NEGATIVE Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREE Site 59809 Mixed use) SA Objective 1:- DISAGREE - Should be rated as NEGATIVE Site is NOT within 800m of existing healthcare facility. Although public footpaths cross the site, development would destroy their value. SA Objective 2: AGREE SA Objective 3: AGREE SA Objective 4: AGREE but should be MINOR POSITIVE Bus services are inadequate for current needs and any</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As</p>

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		<p>development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE Loss of this agricultural land WILL significantly diminish biodiversity. This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. SA Objective 7: AGREE SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect. SA Objective 9: AGREE STRONGLY The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV. SA Objective 10- DISAGREE - This should be rated as NEGATIVE Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. SA Objectives 11,12,13: AGREEGreen Belt LandThe Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development "that protects areas of particular importance", which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.** Rather all other options should be considered first.Best Most Valuable Agricultural Land (BMV)There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site</p>	<p>outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.Site Specific Comments with regard to BMVSITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%.SITE 59721: Grade 2 land makes up at least 50% of the site.SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%.SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site. **This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.	
42812385	Annex 1	Regarding site 59803, no part of the site is within 800m (as the crow flies) from the only vehicle/pedestrian entry to the station car park (from Bow Road), and less than 2% of the site area is within 800m of the pedestrian entrance from the car park to the station platforms (again, as the crow flies). As entry to the station premises can ONLY be gained from Bow Road it is disingenuous to state that the site is within 800m of the station, since a distance considerably in excess of 800m must be travelled to the Bow Road entry point (even for a crow). When considering that it is not possible to walk in a direct straight line to the station, the distance from the extremity of the site to the station ticket machine and platforms is circa 1900m. Therefore please adjust the SA10 assessment for this site accordingly.	As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distance from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.
42171937	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu644roof.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p>	<p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p>	

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42438113	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare</p>

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		<p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu655roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is</p>

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated</p>

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	<p>sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site</p>

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

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		<p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42441857	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs</p>

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		<p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu667roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p>	<p>within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	<p>located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p>	

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		<p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p>	

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		<p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42448545	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p>

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		<p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. * There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. * These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p>	<p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into</p>

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p>	<p>consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural</p>

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		<p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p>	<p>SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p>	

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42460449	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685 * 59690 * 59693 * 59721 * 59805 * 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu689roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change</p>

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		<p>roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school</p>

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	<p>(Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p>	

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		<p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42439137	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> · 59685 · 59690 · 59693 · 59721 · 59805 · 59809 <p>I object to any development on these sites, for the following reasons:</p> <p>3) 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA</p>

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		<p>principal reason why they were not included in the previous development plan.</p> <p>2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>3) The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>4) Local food production is made more important by the effects of climate change.</p> <p>5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>7) Development will lead to a significant loss of biodiversity.</p> <p>8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>9) Development will put even more stress on the already stretched local health and education services.</p> <p>10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Medical facilities etc.</p>	<p>objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water</p>

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		<p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <ul style="list-style-type: none"> · The site is NOT within 800m of an existing secondary or primary school. <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Loss of this agricultural land WILL significantly diminish biodiversity. · This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides. <p>SA Objective 7: AGREE</p>	<p>bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. · The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. <p>SA Objective 9: AGREE STRONGLY</p> <ul style="list-style-type: none"> · The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. · Although public footpaths cross the site, development would destroy their value. <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	<p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p>	

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		<p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. · The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. <p>SA Objective 9: AGREE STRONGLY</p> <ul style="list-style-type: none"> · The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative. <p>SA Objective 4: AGREE</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Loss of this currently unfarmed land WILL significantly diminish biodiversity. · This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape. <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. <p>SA Objective 9: AGREE STRONGLY</p> <ul style="list-style-type: none"> · The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities. 	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. · Although public footpaths cross the site, development would destroy their value. <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Loss of this agricultural land WILL significantly diminish biodiversity. · This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. 	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. · The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. <p>SA Objective 9: AGREE STRONGLY</p> <ul style="list-style-type: none"> · The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV. <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. · Although public footpaths cross the site, development would destroy their value. <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42519233	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu710roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly</p>

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		<p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu711roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p>	<p>site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	<p>relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p>	

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		<p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p>	

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		<p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42260449	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p>

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		<p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. * 10)There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. * 11)These sites are not easily accessible to local facilities – shops, schools, medical facilities etc. <p>Dealing with each site in turn:</p>	<p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu722roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into</p>

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		<p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above</p>	<p>land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under</p>

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		<p>effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p>	<p>SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p>	

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		<p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity. * This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility. * Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity. * This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility. * Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42479393	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685 * 59690 * 59693 * 59721 * 59805 * 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu738roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3:- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA</p>

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		<p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly</p>

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		<p>SA Objective 10- DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p>	

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42540865	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and</p>

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		<p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu749roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent</p>

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	<p>to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The</p>

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p>	

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42589121	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p>

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		<p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	<p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		SA Objectives 11,12,13: AGREE	
42609057	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> · 59685 · 59690 · 59693 · 59721 · 59805 · 59809 <p>I object to any development on these sites, for the following reasons:</p> <ol style="list-style-type: none"> 3) 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 3) The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine. 4) Local food production is made more important by the effects of climate change. 5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p>

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		<p>6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>7) Development will lead to a significant loss of biodiversity.</p> <p>8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>9) Development will put even more stress on the already stretched local health and education services.</p> <p>10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>· The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p>	<p>The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu770roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to</p>

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		<p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities. <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. · Although public footpaths cross the site, development would destroy their value. <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Loss of this agricultural land WILL significantly diminish biodiversity. · This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>· Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>· Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42627009	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>59685</p> <p>59690</p> <p>59693</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p>

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		<p>59721</p> <p>59805</p> <p>59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>Local food production is made more important by the effects of climate change.</p> <p>They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>Development will lead to a significant loss of biodiversity.</p>	<p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular</p>

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		<p>Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>Development will put even more stress on the already stretched local health and education services.</p> <p>There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is</p>

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p>	<p>within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'.</p>

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		<p>Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - should be rated as NEGATIVE</p>	<p>Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <p>Site is NOT within 800m of existing healthcare facility.</p> <p>Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <p>Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Site 59805 (Mixed use)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <p>Site is NOT within 800m of existing healthcare facility.</p> <p>Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Site is NOT within 800m of existing healthcare facility.</p> <p>Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42643873	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A); the MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu797roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>* The importance of domestic food production has been highlighted by recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative</p>

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		<p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly</p>

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		<p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	<p>receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

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		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42659905	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p>	<p>SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p>	<p>buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths.</p>

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p>	<p>Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus</p>

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	<p>services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p>	

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		<p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	

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		<p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42712801	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685 * 59690 * 59693 * 59721 * 59805 * 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu819roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is</p>

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		<p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p>	<p>considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

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		<p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain</p>

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		SA Objectives 11,12,13: AGREE	
42718433	Annex 1	<p>Green Belt Land</p> <p>The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?</p> <p>**Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.</p> <p>It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.</p> <p>** Rather all other options should be considered first.</p> <p>Best Most Valuable Agricultural Land (BMV)</p> <p>There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.</p> <p>** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.</p> <p>The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.</p> <p>** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690 receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>

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		<p>land leads to the deduction of varying balance points depending on the % of such land on a site.</p> <p>Site Specific Comments with regard to BMV</p> <p>SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%.</p> <p>SITE 59721: Grade 2 land makes up at least 50% of the site.</p> <p>SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%.</p> <p>SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site.</p> <p>**This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	
42722017	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p>

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		<p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p>	

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		<p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p>	

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		<p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42401697	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is</p>

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		<p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p>	<p>within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a</p>

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		<p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	<p>minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking</p>

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	<p>and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a</p>	

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42192289	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685 * 59690 * 59693 * 59721 * 59805 * 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change</p>

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		<p>roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>mitigation. TSA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	<p>(Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

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		<p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42362881	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu868roof.</p>

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		<p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	<p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in</p>

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	<p>the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with</p>

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		<p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	<p>a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA</p>

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		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	<p>objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p>

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		<p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

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		<p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

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		<p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Green Belt Land</p> <p>The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?</p> <p>**Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.</p> <p>It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.</p> <p>** Rather all other options should be considered first.</p> <p>Best Most Valuable Agricultural Land (BMV)</p> <p>There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.</p> <p>** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.</p>	

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		<p>The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.</p> <p>** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p>	
42802017	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change</p>

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		<p>roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p>	<p>mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	<p>instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school</p>

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>(Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p>

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

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		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Green Belt Land</p>	

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		<p>The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?</p> <p>**Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.</p> <p>It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.</p> <p>** Rather all other options should be considered first.</p> <p>Best Most Valuable Agricultural Land (BMV)</p> <p>There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.</p> <p>** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.</p> <p>The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.</p> <p>** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p>	

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42746401	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> · 59685 · 59690 · 59693 · 59721 · 59805 · 59809 <p>I object to any development on these sites, for the following reasons:</p> <ol style="list-style-type: none"> 3) 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. 2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. 3) The importance of domestic food production has been highlighted by the recent food shortages caused by Climate Change and the war in Ukraine. 4) Local food production is made more important by the effects of climate change. 5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p>

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		<p>6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>7) Development will lead to a significant loss of biodiversity.</p> <p>8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>9) Development will put even more stress on the already stretched local health and education services.</p> <p>10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Site is NOT within 800m of existing healthcare facility. <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <ul style="list-style-type: none"> · The site is NOT within 800m of an existing secondary or primary school. 	<p>The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. TSA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to</p>

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		<p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	<p>SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p>	

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		<p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>· Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p>	

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		<p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		SA Objectives 11,12,13: AGREE	
42784705	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu905roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone.</p>

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		<p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p>	<p>The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu906roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to</p>

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		<p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

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		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p>	

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		<p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p>	

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		<p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42784385	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685</p> <p>* 59690</p> <p>* 59693</p> <p>* 59721</p> <p>* 59805</p> <p>* 59809</p> <p>I object to any development on these sites, for the following reasons:</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p>

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		<p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu917roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p>	<p>uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu918roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect</p>

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		<p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p>	<p>in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p>	

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		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p>	

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		<p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p>	

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		<p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
42712801	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <p>* 59685 * 59690 * 59693 * 59721 * 59805 * 59809</p> <p>I object to any development on these sites, for the following reasons:</p> <p>* They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>* They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>* The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p> <p>* Local food production is made more important by the effects of climate change.</p> <p>* They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>* Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>* Development will lead to a significant loss of biodiversity.</p> <p>* Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>* Development will put even more stress on the already stretched local health and education services.</p> <p>* There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p>	<p>Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu929roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3:</p>

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		<p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home</p>	<p>education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered</p>

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		<p>market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	<p>under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42835361	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> * 59685 * 59690 * 59693 * 59721 * 59805 * 59809 <p>I object to any development on these sites, for the following reasons:</p> <ul style="list-style-type: none"> * They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan. * They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification. * The importance of domestic food production has been highlighted by the recent food shortages cause by the war in Ukraine. * Local food production is made more important by the effects of climate change. * They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated. * Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane. * Development will lead to a significant loss of biodiversity. * Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge. * Development will put even more stress on the already stretched local health and education services. * There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase. 	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: edu940roof.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor</p>

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		<p>* These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE.</p> <p>* The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a</p>	<p>positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source</p>

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		<p>wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>* Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p>	<p>Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in</p>

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p>	<p>relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>Sites 59693, 59721, 59685, 59805 and 59690 have all been appraised as separate sites. All sites, with the exception of 59690, receive a significant negative effect in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land. Site 59690</p>

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		<p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as negative</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p>	<p>receives an uncertain significant negative effect, as it is unknown whether it comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>* Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p>	

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		<p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p> <p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>* Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p>	

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		<p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>* The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1:- DISAGREE - Should be rated as NEGATIVE</p>	

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		<p>* Site is NOT within 800m of existing healthcare facility.</p> <p>* Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>* Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>* This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p>	

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		<p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>* Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>* The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>* Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Green Belt Land</p> <p>The Interim Sustainability Appraisal makes no reference to whether or not the sites are within the Green Belt. Paragraph 11(b) and footnote 7 of the NPPF 2021 indicate that sustainable development is development “that protects areas of particular importance”, which (according to footnote 7) includes designated Green Belts. Therefore, why does the Interim Sustainability Appraisal not state whether or not each site is within the Green Belt?</p> <p>**Without a proper evaluation of the sites in regard to their Green Belt function it is not possible for residents to consider the full merits of each site and top consider all their characteristics when they respond to the Regulation 18 consultation and before the Regulation 19 proposals emerge.</p>	

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		<p>It is also not made clear in the Interim Sustainability Appraisal that the NPPF guidance is that the assumption in the case of Green Belt is still inclined against development unless there are other exceptional circumstances and even if there is not a 5 year land supply.</p> <p>** Rather all other options should be considered first.</p> <p>Best Most Valuable Agricultural Land (BMV)</p> <p>There should be a clearer statement in the Interim Sustainability Appraisal against the development of (BMV). I.E. Grade 1. Grade 2 and Grade 3A DEFRA land classifications.</p> <p>** This protection must be increasingly relevant given the climate change imperatives, the prevailing world order and the economic necessity of food production at home.</p> <p>The suggestion that that Grade 1 and Grade 2 land is only important if it is 25% or less of the site area is a ridiculous statement and can be overcome by landowners banding together to create a larger site, It also excludes Grade 3A land which is also encapsulated in the definition of BMV Agricultural Land.</p> <p>** The Placemaker scoring system (as referenced in the Urban Capacity Study Environmental Layers List) shows that the presence of Grade 1 land leads to the site being clipped. The presence of grade 2 land leads to the deduction of varying balance points depending on the % of such land on a site.</p> <p>Site Specific Comments with regard to BMV</p> <p>SITE 59693: Grade 1 land makes up approximately 20% of the site and grades 1 and 2 together make up approximately 70%.</p> <p>SITE 59721: Grade 2 land makes up at least 50% of the site.</p> <p>SITE 59685: There is some Grade 1 land on the site and grades 1 and 2 make up approximately 25%.</p>	

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		<p>SITE 59805: I am very concerned that above sites have been amalgamated with the larger Grange Farm (59690) site to make 1 large site.</p> <p>**This has the effect of considerably diluting the % of grade 2 land on the combined site. I contend that "site" 59805 is not a true single site as it is bisected by a road. In theory the further enlarging of sites in this way to reduce the % of grade 2 land on them could enable all grade 2 land to be developed.</p>	
42828769	Annex 1	<p>The comments that follow refer to the following sites which are situated to the north of Tonbridge on the land known as Grange Farm and Greentrees:</p> <ul style="list-style-type: none"> · 59685 · 59690 · 59693 · 59721 · 59805 · 59809 <p>I object to any development on these sites, for the following reasons:</p> <p>3) 1) They form a vital part of the Metropolitan Green Belt, fulfilling all the objectives of MGB as stated in the NPPF. This was a principal reason why they were not included in the previous development plan.</p> <p>2) They consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A). The MAFF survey report of April 1991, carried out on behalf of TMBC, confirms this classification.</p> <p>3) The importance of domestic food production has been highlighted by the recent food shortages caused by the war in Ukraine.</p>	<p>Sites 59685, 59690, 59693, 59721, 59805 and 59809 have all been appraised in line with the site assessment criteria contained within Appendix D of the Interim SA Report. The proformas for these sites can be found in Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>Consideration has been given to Best and Most Versatile Agricultural Land within the SA, under SA objective 9: soil. Consideration has also been given to flood risk, under SA objective 8: water.</p> <p>The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>Biodiversity is covered under SA objective 5: biodiversity and geodiversity, open space is covered under SA objectives 1: health and wellbeing and 6: landscape and townscape, landscape is covered under SA objective 6: landscape and townscape, access to healthcare is covered under SA objective 1: health and wellbeing and schools are covered under SA objective 3: education.</p> <p>The proforma for site 59685 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not</p>

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		<p>4) Local food production is made more important by the effects of climate change.</p> <p>5) They are very prone to flooding in wet weather and contain hidden springs which bubble up when the land becomes saturated.</p> <p>6) Development on these sites will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>7) Development will lead to a significant loss of biodiversity.</p> <p>8) Development will irrevocably alter the open, semi-rural, low-density character of north Tonbridge.</p> <p>9) Development will put even more stress on the already stretched local health and education services.</p> <p>10) There will be a significant negative impact on the functioning of town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>11) These sites are not easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Dealing with each site in turn:</p> <p>Site 59685 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE.</p>	<p>covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59685 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59690 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Site 59690 already receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Loss of agricultural land is dealt with separately under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59690 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bu954roof.</p> <p>The proforma for site 59693 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural</p>

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		<p>· The site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE with MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office, and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated SIGNIFICANT NEGATIVE</p> <p>· Site is in a rural setting, NOT on the edge of a settlement. Development of this site will have a significant negative impact on the landscape when viewed from all sides.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	<p>land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. When sites are not located near any settlements in a rural location, they receive a significant negative effect in relation to this objective. With regard to SA objective 8: water, the negligible effect reflects the fact the site does not contain a water body or watercourse, or fall within a Source Protection Zone. The site still receives a significant negative effect against this objective (as part of a mixed effect). Site 59693 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59721 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as not located near any settlements in a rural location and so receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. As explained in the site assessment criteria for SA objective 6, site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. With regard to SA objective 8: water, the site receives an uncertain minor negative effect as it slightly overlaps some land with a 1 in 100 year risk of surface water flooding. Site 59721 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59805 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect). With regard to SA objective 3: education, the site receives an uncertain minor positive effect as it is within 800m of a primary school (Woodlands Primary School). The uncertainty reflects the fact it is unknown whether there is capacity within the school to accommodate new pupils. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. With regard to SA objective 6: landscape and townscape, the site is incorrectly recorded as not located near any settlements in a rural location when it is in fact on</p>

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		<p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59690 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p>	<p>the edge of a settlement. Therefore in the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59805 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p> <p>The proforma for site 59809 states that it is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). In this instance, the site is within 800m of open space and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing. Access to buses is considered separately under SA objective 10: climate change mitigation. SA objective 10 does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Loss of agricultural land is not covered under SA objective 5: biodiversity and geodiversity, and is instead covered under SA objective 9: soil. The site is correctly identified as located on the edge of a settlement and therefore the uncertain minor negative effect in relation to SA objective 6: landscape and townscape is correct. With regard to SA objective 8: water, the site already receives a significant negative effect in relation to this objective. The uncertainty reflects the fact effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage. Site 59809 correctly receives a minor positive effect in relation to SA objective 10: climate change mitigation as it is within 400m of a bus stop.</p>

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		<p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as negative</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59693 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p>	

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>· The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request.</p> <p>SA Objective 9: AGREE STRONGLY</p>	

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		<p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59721 (Residential)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of an existing secondary or primary school. Should be rated as neutral or negative.</p> <p>SA Objective 4: AGREE</p> <p>SA Objective 5– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· Loss of this currently unfarmed land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p>	

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		<p>SA Objective 6– DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <p>· There are houses in close proximity to the site. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from this site has added to that from adjoining sites and previously caused serious flooding on the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and should be producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development would depend on this site highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59805 (Mixed use)</p> <p>SA Objective 1– DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p>	

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		<p>SA Objective 2: AGREE</p> <p>SA Objective 3- DISAGREE - Should be rated as NEGATIVE</p> <ul style="list-style-type: none"> · Practical access to most parts of the site is NOT within 800m of an existing secondary or primary school. <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <ul style="list-style-type: none"> · Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities. <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Loss of this agricultural land WILL significantly diminish biodiversity. · This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows. <p>SA Objective 6- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape. <p>SA Objective 7: AGREE</p> <p>SA Objective 8- DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <ul style="list-style-type: none"> · Water run-off from fields on this site has previously caused serious flooding on Higham Lane, Cuckoo Lane and the A26 (Hadlow Road East). Loss of absorbent land will exacerbate this effect. · The site contains underground springs which regularly bubble-up in periods of prolonged rain, exacerbating the above effect. Corroborating photographic evidence can be supplied on request. 	

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		<p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. I would observe that the grade 3A land found on this site is also classified as BMV.</p> <p>SA Objective 10- DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p> <p>Site 59809 Mixed use)</p> <p>SA Objective 1- DISAGREE - Should be rated as NEGATIVE</p> <p>· Site is NOT within 800m of existing healthcare facility.</p> <p>· Although public footpaths cross the site, development would destroy their value.</p> <p>SA Objective 2: AGREE</p> <p>SA Objective 3: AGREE</p> <p>SA Objective 4: AGREE but should be MINOR POSITIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would depend highly on the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objective 5- DISAGREE - Should be rated as definite SIGNIFICANT NEGATIVE</p>	

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		<p>· Loss of this agricultural land WILL significantly diminish biodiversity.</p> <p>· This has been confirmed by a previous biological survey, registered with Kent and Medway Biological Records Office and indicating that a wide range of wildlife is dependent on the land and its surrounding hedgerows.</p> <p>SA Objective 6– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· The site IS located next to existing housing of low density and with rural aspect. Development of this site will have a significant negative impact on the landscape and townscape.</p> <p>SA Objective 7: AGREE</p> <p>SA Objective 8– DISAGREE - Should be rated as SIGNIFICANT NEGATIVE</p> <p>· Water run-off from fields on this site has previously caused serious flooding on Higham Lane and Cuckoo Lane. Loss of absorbent land will exacerbate this effect.</p> <p>SA Objective 9: AGREE STRONGLY</p> <p>· The land is wholly Best, Most Valuable (BMV) agricultural land and is productive farmland, producing crucial food products for the home market. We observe that grade 3A land is also classified as BMV.</p> <p>SA Objective 10– DISAGREE - This should be rated as NEGATIVE</p> <p>· Bus services are inadequate for current needs and any development on this site would therefore require the use of personal motor transport for travel to work and to use local facilities.</p> <p>SA Objectives 11,12,13: AGREE</p>	
43545921	Annex 1	<p>Site 59678 – West Lake, Aylesford Quarry (west of Bull Lane)</p> <ul style="list-style-type: none"> • Objective 2 – the site is on a bus route and within walking/cycling distance of Aylesford and Eccles with existing footpaths/PROW in situ • Objective 5 – there is no existing green infrastructure asset within the site – currently minerals being extracted but there is the potential to significantly enhance biodiversity and ecology in the future, 	<p>Proximity to bus stops is considered under SA objectives 4: economic growth and 10: climate change mitigation. Site 59678 is recorded in the SA as being within 800m of a railway station, which overrides the fact it is also within close proximity of bus stops. The site receives significant positive effects in relation to SA objectives 4 and 10.</p> <p>Proximity to walking and cycling routes is considered under SA objective 1: health and wellbeing. As the site is within close proximity</p>

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		<p>however it should also be noted that the site is located within the Bushey Wood Area of Opportunity</p> <ul style="list-style-type: none"> • Objective 6 – the site is within walking/cycling distance of Aylesford and Eccles with existing footpath connection. There will be no loss of designated open space (as no public access exists) currently but it is a possible opportunity in the future • Objective 7 – there is significant existing landscape and separation between site and heritage assets which will be retained and enhanced resulting in no adverse harm or impact • Objective 8 – the site is in Flood Zone 1 • Objective 12 – site is in proximity to an existing SW Waste Water Treatment Installation • Objective 13 – The site is within a safeguarded minerals area but viable reserves are currently being extracted and due for completion within 6 - 12 months 	<p>of open space and walking paths, it receives a minor positive effect in relation to SA objective 1.</p> <p>The site does contain a green infrastructure asset, and so it correctly receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. The site comprises Aylesford Pit Regionally Important Geological Site.</p> <p>Site 59678 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located near any settlements in a rural location. Proximity to walking and cycling paths is dealt with separately under SA objective 1: health and wellbeing. Sites adjacent to the existing urban edge can be more easily integrated into existing built development than sites outside of settlements. The proforma states that the site is not located near any settlements in rural locations <i>and/or</i> would result in the loss of designated open spaces. In this instance, development of the site would not result in the loss of designated open spaces. All adverse effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Site 59678 receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. This is a 'policy-off' appraisal and so consideration is not given to mitigation. All effects against SA objective 7 are recorded as uncertain, as actual effects depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding. Additionally, it contains a large water body.</p> <p>SA objective 12 relates to air quality, not waste water treatment. The site receives a negligible effect in relation to SA objective 12 as it is not within 100m of an Air Quality Management Area.</p> <p>With regard to SA objective 13: material assets and waste, the SA at this stage does not take into consideration mitigation and so even if the site will be extracted prior to development, the effect should remain as it is. This is because information like this may not be available for other sites and so they would not all be appraised on a consistent basis.</p>
43545921	Annex 1	<p>Site 59676 – East Lake, Aylesford Quarry (east of Bull Lane accessed off Rochester Road)</p> <ul style="list-style-type: none"> • Objective 1 – the site is not an area of public open space or outdoor sports facility – accordingly there cannot be any loss (if none exists 	<p>Site 59697 is incorrectly recorded as containing an existing open space. This is due to the fact it slightly overlaps an existing open space and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site</p>

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		<p>currently), however opportunities exist to create significant new public open space/water activities and public access</p> <ul style="list-style-type: none"> • Objective 4 – there are currently employment uses on site but less than 5 hectares – the site however does have the potential for employment uses in excess of 5 hectares • Objective 5 – there is currently no existing green infrastructure asset within site, however the proposed development will offer significant biodiversity and ecological habitat enhancement • Objective 6 – as part of the pre-application and post submission discussions, it has been agreed with TMBC officers (Eleanor Hoyle/Emma Keefe/William Allwood/Robin Gilbert/James Bailey/Nigel de Wit) that the site is considered to be a sustainable location • Objective 7 – it has been agreed by Debbie Salter (TMBC Conservation Officer) that significant material changes in circumstances on site address heritage issues raised in planning appeal (APP/H2265/W/18/3209279) • Objective 8 – the site is in Flood Zone 1 • Objective 11 – the proposed later living community development is positively planned and will endeavour to exceed current building regulations in terms of climate change and construction • Objective 13 – KCC Minerals & Waste consultation response to the current planning application confirms that no objection to the development proposals on Mineral Safeguarding grounds – the site has been extensively worked and there are no safeguarded minerals on site – ubiquitous material (hoggin) is found to the north. • Objective 14 – the current planning application can both support the TMBC housing land supply and address a specifically identified need for age related housing and care accommodation. 	<p>will receive a minor positive effect only in relation to SA objective 1. The sites have been appraised on a 'policy-off' basis and so consideration is not given to mitigation (e.g. open space provision).</p> <p>SA objective 4: economic growth relates to the provision of employment space. As site 59676 is proposed for mixed use development, it will provide employment space. Therefore, it correctly receives a significant positive in relation to SA objective 4.</p> <p>The site does contain a green infrastructure asset, and so it correctly receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. The site comprises Wagons Pit Aylesford Regionally Important Geological Site. The site has been appraised on a 'policy-off' basis and so consideration is not given to mitigation (e.g. biodiversity and ecological habitat enhancement).</p> <p>SA objective 6 relates to the landscape and townscape. The site is correctly recorded as having an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is on the edge of a settlement. Sites adjacent to the existing urban edge can be more easily integrated into existing built development than sites outside of settlements. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Site 59676 correctly receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as effects will also depend on the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding. Additionally, it contains a large water body.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Site 59697 receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste as it is within a Minerals Safeguarding Area. Although the site promoter states that the site has already undergone aggregate abstraction, this level of information is not available for most of the sites. So as to ensure consistency, all</p>

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			<p>sites within a Minerals Safeguarding Area are recorded as having an uncertain minor negative effect in relation to this objective.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p>
43545921	Annex 1	<p>Site 59670 - Area E, Aylesford Quarry (Land north of Lodge Cottages)</p> <ul style="list-style-type: none"> • Objective 1 - the site is not an area of public open space or outdoor sports facility – accordingly there cannot be any loss (if none exists currently) • Objective 3 – the lawful use of the site is Class F1 (formerly Class D1) as a training facility for power workers with associated open storage and vehicle parking. • Objective 4 – the site is within immediate proximity of a bus route along Bull Lane and within the Bushey Wood Area of Opportunity • Objective 5 – the site comprises made ground and is not within 250m of a designated biodiversity or geodiversity sites and there is currently no existing green infrastructure asset within site, however the opportunity exists to offer significant biodiversity and ecological habitat enhancement • Objective 6 - the site is within walking/cycling distance of Aylesford and Eccles with existing footpath connection. There will be no loss of designated open space (as no public access exists) • Objective 7 – there is significant existing landscape and separation between site and heritage assets which will be retained and enhanced resulting in no adverse harm or impact • Objective 13 – the site is not within a Minerals Safeguarding Area and comprises made ground from historic inert quarrying overburden. 	<p>With regard to SA objective 1: health and wellbeing, site 59670 is not recorded as containing an open space. The site receives a minor positive effect in relation to SA objective 1, as it is within 800m of existing areas of open space, in addition to walking paths.</p> <p>SA objective 3: education looks at the proximity of sites to primary and secondary schools. As the site is within 800m of a primary school, it receives a minor positive effect. The effect is uncertain as school capacity is unknown.</p> <p>Proximity to bus stops is considered under SA objectives 4: economic growth and 10: climate change mitigation. Site 59670 is recorded in the SA as being within 800m of a railway station, which overrides the fact it is also within close proximity of bus stops. The site receives significant positive effects in relation to SA objectives 4 and 10.</p> <p>The site does contain a green infrastructure asset, and so it correctly receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. The site comprises Aylesford Pit Regionally Important Geological Site. The site has been appraised on a 'policy-off' basis and so consideration is not given to mitigation (e.g. biodiversity and ecological habitat enhancement).</p> <p>SA objective 6 relates to the landscape and townscape whereas walking and cycling paths are dealt with separately under SA objective 1: health and wellbeing. The site is correctly recorded as having an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is on the edge of a settlement. Sites adjacent to the existing urban edge can be more easily integrated into existing built development than sites outside of settlements. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Site 59670 correctly receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as effects will also depend on the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>Site 59670 does fall within a Minerals Safeguarding Area. Although the site promoter states that the site comprises made ground from historic inert quarrying overburden, this level of information is not available for most of the sites. So as to ensure consistency, all sites within a Minerals Safeguarding Area are recorded as having an uncertain minor negative effect in relation to this objective.</p>
43545921	Annex 1	<p>Site 59674 – Area I, Aylesford Quarry (land south of High Street/Bull Lane)</p> <ul style="list-style-type: none"> • Objective 1 – the site is not an area of public open space or outdoor sports facility – accordingly there cannot be any loss (if none exists currently) • Objective 4 – the site is not an existing employment site and is accessible to both the train station and immediate proximity to an existing bus route which runs along High Street/Bull Lane • Objective 5 – the upper part of the site comprises made ground and is not within 250m of a designated biodiversity or geodiversity sites and there is currently no existing green infrastructure asset within site, however the opportunity exists to offer significant biodiversity and ecological habitat enhancement • Objective 6 – the site is within 200m of Aylesford village centre with pedestrian access via the existing footpath immediately opposite the site entrance • Objective 7 – there is significant existing landscape and separation between site and heritage assets which will be retained and enhanced resulting in no adverse harm or impact • Objective 8 – the lower part of the site is within Flood Zone 2. The upper part of the site (the developable area) with direct access onto High Street/Bull Lane is within Flood Zone 1. There are significant level differences across the upper and lower parts of the site with dense woodland/landscaping at the lower level • Objective 10 – the site is also immediately adjacent to a bus route on High Street/Bull Lane • Objective 13 – the site is not within a Minerals Safeguarding Area 	<p>With regard to SA objective 1: health and wellbeing, site 59674 is not recorded as containing an open space. The site receives a minor positive effect in relation to SA objective 1, as it is within 800m of existing areas of open space, in addition to walking paths.</p> <p>SA objective 4: economic growth relates to the provision of employment space. As site 59674 is proposed for mixed use development, it will provide employment space. It is also within 800m of a train station. Therefore, it correctly receives a significant positive in relation to SA objective 4.</p> <p>The site does contain a green infrastructure asset, and so it correctly receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. Additionally, it is within 250m of some SSSIs. The site has been appraised on a 'policy-off' basis and so consideration is not given to mitigation (e.g. biodiversity and ecological habitat enhancement).</p> <p>SA objective 6 relates to the landscape and townscape whereas walking and cycling paths are dealt with separately under SA objective 1: health and wellbeing. Site 59674 is recorded in the SA as being within 800m of a railway station, which overrides the fact it is also within close proximity of bus stops. The site receives significant positive effects in relation to SA objectives 4 and 10.</p> <p>Site 59674 correctly receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as effects will also depend on the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, more than 25% of the site is within Flood Zone 2. It also abuts a watercourse and is within Source Protection Zone 3. Therefore, it correctly receives an uncertain minor negative effect in relation to SA objective 8.</p>

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			<p>Proximity to bus stops is considered under SA objectives 4: economic growth and 10: climate change mitigation. Site 59674 is recorded in the SA as being within 800m of a railway station, which overrides the fact it is also within close proximity of bus stops. The site receives significant positive effects in relation to SA objectives 4 and 10.</p> <p>Site 59670 does fall within a Minerals Safeguarding Area. Therefore, it correctly receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste.</p>
43545921	Annex 1	<p>Site 59675 – Northern Fields (land north of Aylesford Quarry/east of Bull Lane)</p> <ul style="list-style-type: none"> • Objective 1 – the site is not an area of public open space or outdoor sports facility – accordingly there cannot be any loss (if none exists currently) • Objective 2 – the site is within 300m of Eccles and connected via an existing footpath and is within walking/cycling distance of Eccles and Aylesford as well as being immediately adjacent to the allocated land at Bushey Wood which is subject to a live planning application for a significant mixed-use development (TM/22/00113/OAEA) • Objective 4 – the site is not an employment site in excess of 5 hectares but the site is within 400m of a bus stop/route along Bull Lane • Objective 5 – the site is not within the stated distance of a designated biodiversity or geodiversity site • Objective 6 – the site is within 300m of Eccles, is adjacent to the allocated land at Bushey Wood (see above) and there is no designated open space on the site (so there cannot be any loss) • Objective 7 – the site is not within 250m of a heritage asset • Objective 8 – the site is within Flood Zone 1 • Objective 9 – the site is not identified as being grade 1 or 2 agricultural land (as referenced on DEFRA MAGIC Maps) • Objective 10 – the site is within 400m of a bus stop/route along Bull Lane • Objective 13 – the site is not within a Minerals Safeguarding Area as the site contains hoggin reserves which is a ubiquitous material 	<p>With regard to SA objective 1: health and wellbeing, site 59675 is not recorded as containing an open space. The site receives a minor positive effect in relation to SA objective 1, as it is within 800m of existing areas of open space, in addition to walking paths.</p> <p>SA objective 2: services and facilities is informed by the Urban Capacity Study (July 2022). As the site is recorded in the Urban Capacity Study as falling within the Poor Accessibility Band, it correctly receives a significant negative effect in relation to SA objective 2.</p> <p>SA objective 4: economic growth relates to the provision of employment space. As site 59675 is proposed for mixed use development, it will provide employment space. Therefore, it receives a significant positive effect in relation to SA objective 4.</p> <p>The site comprises Wagons Pit Regionally Important Geological Site and is within 250m of other biodiversity and geodiversity assets. Therefore it receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>SA objective 6 covers landscape and townscape, not biodiversity. Biodiversity is dealt with under SA objective 5. The site receives an uncertain significant negative effect in relation to SA objective 6, as it is not located near any settlements in a rural location. Sites adjacent to the existing urban edge can be more easily integrated into existing built development compared to more rural and isolated sites. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>With regard to SA objective 7: heritage, the site is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, it correctly receives an uncertain significant negative effect in relation to SA objective 7.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>With regard to SA objective 9: soil, the site comprises grade 2 agricultural land. Therefore, it correctly receives a significant negative effect in relation to SA objective 9.</p> <p>With regard to SA objective 10: climate change mitigation, although there are bus stops on Bull Lane, this is more than 400m from the site. The site is correctly recorded as having a minor negative effect in relation to SA objective 10.</p> <p>Site 59675 does fall within a Minerals Safeguarding Area. Therefore, it correctly receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste. The effect is uncertain, as the actual effect will depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p>
42779233	Annex 1	<p>[comments in the context of site reference 59700 and 59845]</p> <p>With regards to SA objective 1 - 'To improve human health and well being'.</p> <p>The sites may well be close to healthcare facilities, but with many more houses built, there will not be enough space in the healthcare facility to take all the additional people on and so people will have to drive to other facilities. Health will be affected as we already have one of the worst air polluted roads in Kent and more houses will mean much more pollution for us.</p> <p>With regards to SA objective 3 - The schools will not have space for all the children that these houses will bring with them and therefore the children will have to go elsewhere</p> <p>With regards to SA objective 6 - To protect the boroughs landscape.</p> <p>This proposal will destroy our one and only view of the Medway valley.</p> <p>With regards to SA objective 9 - It is a Greenfield site and as stated, it contains a significant proportion of Grade 1 and/or 2 agricultural land. This cannot be taken away as these sites are diminishing gradually all over the country and we need these for the health of the world and the people living in it.</p> <p>With regards to SA Objective 12 - TO PROTECT AND IMPROVE AIR QUALITY.</p> <p>It is stated that these sites are not within 100m of an AQMA, but building these houses here will probably turn it into one of them eventually. As I have previously stated, we have one of the WORST air polluted roads in Kent and this will make it so very much worse.</p> <p>Please do not permit this planning application to go through.</p>	<p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Site 59700 receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is on the edge of a settlement. Site 59845 is incorrectly recorded as having an uncertain significant negative effect in relation to SA objective 6 when it should have an uncertain minor negative effect, as it is also on the edge of a settlement. In the next iteration of the SA Report, site 59845 will receive an uncertain minor negative effect in relation to SA6. As set out in the site assessment criteria, "Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. However, the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects".</p> <p>With regard to SA objective 9: soil, the respondent agrees with the findings of the SA.</p> <p>With regard to SA objective 12: air quality, sites 59700 and 59845 have been appraised in line with the site assessment criteria. As neither site is within 100m of an AQMA, both receive a negligible effect.</p> <p>Please note that this is an SA, the purpose of which is to provide an objective assessment of the sustainability of numerous sites across the Borough thereby informing Council decisions on which sites to allocate or not allocate in the new Local Plan. The SA is one of many factors that feed into the plan-making process and has no relationship to planning applications.</p>

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43485921	Annex 1	<p>[with reference to site 59740]</p> <p>Section B Critique of Site Against Sustainability Assessment Objectives and Sub Objectives</p> <p>Using the visual representation scheme of the Interim Sustainability Appraisal (SA), BAG's review of this site would be as follows:</p> <p>[a table showing different appraisals against the sustainability objectives to that published in the SA-differences SA1- significantly negative SA3- negligible negative SA4 minor positive SA10 minor negative SA12 minor negative]</p> <p>The above assessment is based on extensive research into what is known about the site. TMBC's published sustainability assessment is given below for ease of comparison:</p> <p>The colour codes follow those given in the SA as follows:</p> <p>In broad terms, even though TMBC's assessment of the site is not favourable on most of the SA objectives, BAG believes that, due to the significant amount of information already known about this site, it should have an even poorer scoring. This leads to a conclusion that as Site 59740 fails to meet the majority of indicators to deem it suitable for sustainable development, it should be excluded from the new Local Plan going forward.</p> <p>Details of BAG's assessment are given below:</p> <p>SA Objective 1: To improve human health and well-being</p> <p>BAG Assessment: Significant negative (--) SA Assessment: Minor positive (+)/Uncertain significant negative (1)</p> <p>Taking into account an evaluation of what is known about the site, BAG believe the assessment on this Objective should be a "Significant negative", taking the following into account:</p> <p>The SA report suggests that the negative effectives of the loss of open space which would be lost as a result of development are uncertain. These effects are not uncertain as the open countryside and farmland of the site, and the public's access to it, will only be harmed by development. Any development will affect the open vistas and well being benefits of the area. The report mentions that the site is within "800m of an existing healthcare facility or open space". At 112.74 hectares this site is vast, 1.3 km from west to east and just under 2km from north to south and although it may be true that some of the site is within 800m of an existing health care facility, not all of it is and primary health care in the area is known to be under great stress. For example, 5 the allocated space for a GP surgery at Leybourne Grange was eventually re-purposed after laying empty for several years as no GP practice was found to take it on and also, the MP for the area, Tom Tungendhat, even wrote to the West Kent Clinical Commissioning group asking them to confirm their objection to the proposal for 900 + houses on the site due to the lack of primary care security in this part of Kent. Additionally, BAG would support its classification of the site as</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>The SA does acknowledge the heritage assets within 250m of the site (including within the site). For this reason, the site receives a significant negative effect in relation to SA objective 7: heritage. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA also acknowledges the fact the site is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land. For this reason, the site receives a significant negative effect in relation to SA objective 9: soil. It is not possible to exceed Grade 1 or 2 best and most versatile agricultural land.</p> <p>This is a 'policy-off' appraisal and so the site is appraised on its physical merits only. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>In LUC's SA, all reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1. With regard to the respondent's point on uncertainty, if a site is recorded as containing a designated open space it receives some uncertainty, as it is unknown whether the open space will be lost or not, or integrated into development. With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide</p>

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		<p>"Significant negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To improve access to health and social care services Given the information presented there is no information presented to support this. • To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, children's play areas and the countryside. Any development of this area would harm the promotion of healthy lifestyles for current residents and visitors alike. There is a very well used and inter-connecting network of rural footpaths and Quiet Lanes connecting West Malling, East Malling and Kings Hill. It is currently possible to travel on foot or cycle through countryside, farmland and Quiet Lanes between these settlements. This important green space, with its rural footpaths, is used for leisure and is enjoyed by those seeking a healthier lifestyle and would be negatively impacted. • To reduce levels of anti-social behaviour. Residents of Kings Hill and its Parish Council have seen a worrying increase in antisocial behaviour in recent years. Given that any substantial new housing on this site is likely to replicate the essence, at least, of the Kings Hill model, it follows that there could well be an increase in antisocial behaviour, not a reduction. • To encourage safety by design The very location of the site within the Quiet Lane network and the known existing black spots on the A228 does not encourage "safety by design". At least 3 people have been knocked down at the pedestrian crossing on the A228 by vehicular traffic. • To promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure. Developing this site would only impact negatively on the existing green spaces of the site so consequently the connection with nature already enjoyed by those who use the site could only be negatively impacted. <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>BAG Assessment: Minor Negative (-) SA Assessment: Minor negative (-)</p> <p>BAG has been unable to verify the definition of a "Fair Accessibility Band" in this instance but would agree that it could be reasonably anticipated that an area which has open access to all at the moment would be negatively impacted by development so also suggests an assessment of "Minor negative".</p> <p>6</p> <p>Additionally, BAG would support its classification of the site as "Minor negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p>	<p>to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59740 is 5ha or more, it receives a significant positive effect in relation to this objective. The fact it is also within 800m of a train station also contributes to this significant positive effect.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlements of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p>

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		<ul style="list-style-type: none"> • To tackle homelessness more effectively BAG is unaware of any evidence that a development such as this would tackle homelessness more effectively nor any evidence that the AFFORDIBILITY ISSUE would be addressed for TMBC residents all the time there is such a financial advantage to moving out of London and its suburbs. • To improve access to cultural and leisure facilities There is no evidence that such access would be improved. • To promote the use of more sustainable modes of transport & • To encourage walking, cycling and the use of public transport. <p>The establishment of the communities at Kings Hill, Leybourne Grange etc have proven that road traffic is only getting worse in this area of Kent. The reality is that the most convenient form of transport for people, where they have a choice, is usually their own car and although any new development might “promote” or “encourage” more sustainable ways of moving around and undertaking daily tasks, is there actually any proof that a development such as this would achieve these given the complexities of everyday life for most people?</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>BAG Assessment: Negligible SA Assessment: Uncertain minor positive (+?)</p> <p>The SA narrative regarding this site refers to the site being within 800m of a primary or secondary school (not both). However the nearest local secondary school (The Malling School) in East Malling, is, we understand, oversubscribed. There is no access from the site to the school and as the site is so large, only a small proportion is within half a mile of the school itself.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>BAG Assessment: Uncertain minor positive (-?) SA Assessment: Significant positive (++)</p> <p>The narrative for the site states that it is within 800m of a train station and that 5 Ha have been proposed for business deployment. As the plans for the site have not been published it is not possible to verify whether the 5 Ha deployed for business use are actually within 800m of the station or not.</p> <p>TMBC are encouraged to re-examine the original zonal use plans for Kings Hill and determine the proportion of business use sites for which have been re-allocated for housing as the old airfield site evolved. The outline plan may well include business and other commercial space but the reality is that experience points to the fact that developers can and do apply for change of use from commercial to housing which makes the SA designation against this criterion uncertain. Residents, workers and visitors to Kings Hill will all remember the many years that units in the “town centre” area of</p>	<p>With regard to SA objective 13: material assets and waste, the minor negative effect is recorded as uncertain as although the site is within a Minerals Safeguarding Area, the actual effect will depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>The respondent has not provided a reason as to why they consider the uncertain minor positive effect against SA objective 14: housing unreasonable. Site 59740 is proposed for a mix of uses but it is unknown what percentage of the site will e provided for housing, hence the uncertainty.</p>

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		<p>Kings Hill around Queen Street lay empty. It is thought that the underuse of these</p> <p>7</p> <p>commercial spaces could be directly attributed to high lease costs and not due to lack of interest in the business space. Therefore, although a strong retail and commercial hub for Kings Hill was envisaged at the planning stage, this was not delivered as anticipated and parallels can be read into the potential development of Site 59740.</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To diversify employment opportunities • To increase employment opportunities • To encourage economic growth <p>No information has been found in the SA paperwork for this site to support these statements.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>BAG Assessment: Significant negative (--) SA Assessment: Uncertain significant negative (--?)</p> <p>The rich biodiversity of this site has been well documented and TMBC are in possession of information to support this, not least from the responses from Consultees, BAG and others in relation to Berkeley Homes' planning application for Broadwater Farm (TM/21/02719). It is therefore thought that the SA assessment for this site should be "Significant negative" rather than "Uncertain significant negative". Annex E gives the Wildlife Sub-Committee Report BAG submitted regarding this site which supports this assertion, however particular attention is also drawn to Ecological Advice Service comments submitted to TMBC in relation to application TM/21/02719 on 21 March 2022. Additionally, BAG would support classification of the site as "Significant negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and enhance designated sites of nature conservation importance The New Barns & Broadwater Farm Conservation Area would be impacted. • To protect and enhance wildlife especially rare and endangered species. The site as a whole currently provides habitats for both resident and migratory red-listed species. • To protect and enhance habitats and wildlife corridors As the West Kent Badger Group highlighted in their response to TM/21/02719 and given as Appendix F, any development of this site would damage habitats not "protect and enhance". • To provide opportunities for people to access wildlife and open green spaces. Any development would restrict and limit the existing opportunities for people to access wildlife and open green spaces. 	

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		<ul style="list-style-type: none"> • To increase biodiversity net gain. This site currently provides a range of rich wildlife habitats, including meadows, orchards, hedgerows and wooded areas. • To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline. Development of this area would not protect and enhance priority species (see Wildlife report Annex E). <p>8</p> <ul style="list-style-type: none"> • To protect, enhance and expand ecological networks and their interconnectivity. There is no current evidence to support this achievement of this objection, in fact the opposite is apparent. • Conservation of biodiversity, including priority habitats and species, under the NERC Act (S41). • To protect and enhance sites designated for geodiversity. The Broadwater area is an area of geological interest, highlighted by the area's names such as "Broadwater" and "Well Street", which would neither be protected nor enhanced by development. <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>BAG Assessment: Significant negative (--) SA Assessment: Uncertain significant negative (--)</p> <p>BAG considers the impact of developing this area would not be uncertain but would lead to actual significant harm to the landscape's character and quality. As mentioned previously, the consultation process for application TM/21/02719 elicited a large body of information regarding the negative impact of developing the Broadwater area. The landscape character and quality is currently derived through its unique mix of natural features (rolling open vistas, the Cwylla which is an historic Anglo Saxon monument) and important historic buildings, many of them both listed and protected by their positions within Conservation Areas. For example the New Barns and Broadwater Farm Conservation Area was designated as such, in part, due to the quality of views into, out of and across the area between the New Barns hamlet and the Broadwater Farmstead with substantial oast house complexes at either side, completing a quintessentially Kentish landscape. Any further development in this area would certainly significantly encroach on these features. Any building proposed within view of the Conservation Area would contravene the reason for Conservation Area status being granted in 1993. Additionally, BAG would support classification of the site as "Significantly negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and enhance landscape character and quality. Features are protected currently, development of the area would harm them rather than further enhance or protect them. 	

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		<ul style="list-style-type: none"> • Protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place. BAG believes this sub-objective to be of particular importance for Broadwater as not only is the rural landscape "distinct" it is also unique containing the only listed instance of a "Cwylla" and is encompassed by a network of ancient sunken roads or hollow ways which are designated now as "Quiet Lanes". • To protect and enhance AONBs within the borough and their settings. Although situated to the edge of an AONB rather than within it, further development would harm the setting of the Kent Downs AONB. <p>9</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>BAG Assessment: Significant negative (--) SA Assessment: Uncertain significant negative (--)</p> <p>BAG considers the impact of developing this area would not be uncertain but would lead to actual significant harm to its cultural heritage resource. As mentioned previously, the consultation process for application TM/21/02719 elicited a large body of information regarding the negative impact of developing the Broadwater area. The cultural heritage of this corner of Tonbridge and Malling is well documented and currently enjoys various statutory protections through its many listed buildings and Conservation Areas. BAG's Sub-Committee Heritage submission in relation to Planning Application TM/21/02719 (Appendix G) gives more detail. Additionally, BAG would support classification of the site as "Significantly negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and enhance historic buildings and sites. Within this area are numerous listed buildings including The Barracks and Derbies on Well Street, East Malling which are Grade2* listed. This shows they are of particular national historic interest, in this case with strong links to the English Civil war. • To protect and enhance historic landscape/townscape value. With reference to the New Barns and Broadwater Farm Conservation Area in particular, the historic landscape is currently protected. The views across and into and out of this area were particularly important in the Conservation Area designation and the associated visual amenity would undoubtedly be significantly harmed through further development, • Cultural Heritage As referenced above, the cultural significance of the area reflects not only the hop farming heritage which endures through the proliferation of oast buildings across the site, but also goes back to the English Civil War and beyond a thousand years. <p>SA Objective 8: To protect and enhance the quality of water features and resources</p>	

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		<p>BAG Assessment: Significant negative (--) SA Assessment: Significant negative (--) / Uncertain significant negative (--)</p> <p>BAG strongly believes that development in this area would have a significant negative effect with regard to this objective. The report on the Hydrogeology of this area is attached as Annex A to provide further details but essentially this shows the existence of aquifers. It is these underground water courses which feed the ancient Cwylla, contribute greatly to the productivity of Broadwater Farm and also give rise to what becomes the Ditton Stream which actually rises at Well Street. Development of this area would cause damage to these water features. The narrative associated with this SA Objective does, of course, highlight the importance of protecting the aquifers as they are within a Source Protection Zone 1 and BAG believes that significant harm would certainly be caused by developing this area for example through certain hydrocarbon pollution and so the designation should be definitive and not "uncertain".</p> <p>10</p> <p>Additionally, BAG would support its classification of the site as "Significant negative" with these comments on the following sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and enhance ground and surface water quality. The Broadwater area is, as the name confirms, rich in ground and surface water resources, development would not enhance its quality and the best way to ensure its protection would be to keep the area in its current largely undeveloped state. • Reduce the risk of flooding to existing communities and ensure no new developments are at risk. BAG is seriously concerned that should any developer attempt the mitigation of flood risk, this would lead to serious harm to the Anglo Saxon Cwylla, which, as has been stated previously, is a KCC listed monument. Mitigation would, additionally, affect the water which has been accessible to the historic properties of Well Street and Broadwater Road since the area was first populated centuries ago. The water flow to the Ditton Stream would be impacted also. Due to being situated lower in the landscape than the surrounding area, the houses on the west of the New Barns hamlet would be at risk of flooding from any development to the south which interrupts the natural surface water drainage flows. • To protect and enhance water quantity, such as through high standards of water efficiency. The quality of the water which rises in Well Street is currently being investigated as a potential source of potable water by the local water authority, development of the area would introduce pollutants which could seriously affect this. <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>BAG Assessment: Significant negative (--) SA Assessment: Significant negative (--)</p>	

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		<p>The SA assessment highlights the greenfield nature of this site and BAG agrees with the determination of “Significant negative” against this SA Objective. As confirmed in the soil report in Annex B more than 49% of land at Broadwater is Grade 1 or Grade 2 with 100% being Grade 3 and above i.e. Best and Most Versatile. The northern part of the site (formerly Eden Farm) was shown to have 90% grade 2 and above. BAG therefore agrees with the assessment of this Site as “Significant negative” and would further added the following comments on the sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To reduce the amount of derelict, contaminated, and vacant land. None of the land involved is of this type so this objection is not met. • To encourage development of brownfield land where appropriate. Only a small proportion of the land where the current farm buildings are situated could be classed as brownfield so this objection is largely unmet. • To protect soil functions and quality. Developing this land would remove actively farmed land so this objective cannot be met. • Avoid development of ‘best and most versatile’ soil. Grade 3 soil is designated as “Best and most versatile”, 100% of the soil at Broadwater Farm is at this level or even higher grade so its development should definitely be avoided. <p>11</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>BAG Assessment: Minor negative SA Assessment: Significant positive (++)</p> <p>BAG disagrees that there is evidence to suggest that a 112 hectare development would reduce greenhouse gas emissions and would suggest this Objective should be classified as a “Minor negative” at best. BAG would like to see TMBC undertake a real-world analysis of the travel and domestic hydrocarbon use of Kings Hill. The increase in traffic in to and out of Kings Hill during the twice daily rush hour and the steady flow into and out of the area at other times does not support the assessment of this criteria as “Significant positive”. The only support given for this assessment is that the site is within 800m of a railway station. There is no evidence of whether there would actually be any housing or businesses within this distance of the station as less than, approximately, 30% of the site that is within 800m of West Malling station. As has been commented on previously, developments of the proposed scale of Site 59740 actively encourage people to move from more expensive areas (London) to realise more home for their money, however new residents then typically need to extend their commutes to work. The Assessed Housing Need of 15,741, a thirty percent uplift, could only be fulfilled from people moving into the area and it is difficult to understand how this would or could reduce greenhouse gas emissions given the reality of normal every-day lives. Additionally, BAG would support its classification of</p>	

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		<p>the site as “Minor negative” with these comments on the sub-objectives:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To reduce greenhouse gas emissions. • To increase energy efficiency and require the use of renewable energy sources. • To reduce the use of energy. • To promote the use of more sustainable modes of transport. • To reduce the use of private car. • To encourage walking, cycling and the use of public transport. • Encourage the uptake of ICT. <p>Other than approximately (just) one third of the site being within 800m of a railway station, no other information is given to support an assessment of “Significant positive” against any of these sub-objectives.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimise its impact</p> <p>BAG Assessment: Negligible (0) SA Assessment: Negligible (0)</p> <p>BAG is unaware of any information to support or challenge this assessment.</p> <p>12</p> <p>SA Objective 12: To protect and improve air quality</p> <p>BAG Assessment: Minor Negative SA Assessment: Negligible</p> <p>Although the site is not within 100m of an AQMA, BAG considers that TMBC should consider the establishment of an AQMA for the A228 from the south of Kings Hill through to Leybourne. There are significant traffic build-ups almost every working day and there are many more houses yet to be built in the vicinity which already have permission. It should also be noted that when the Reserved Matters for application TM/18/03034/OAEA were considered at Area 2 Planning Committee earlier this year, a significant concern of the Councillors was the proximity of the proposed playground site to the A228 and the potential risk from pollution. This confirms that TMBC are aware of and are sensitive to air quality issues in the vicinity of the western portion of this site. Additionally, BAG would support its classification of the site as “Minor negative” with these comments on the following sub-objective:</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and improve local air quality. Given the site is mainly green fields, orchard, hedgerows and trees, it is difficult to see how air quality could be improved by development. <p>SA Objective 13: To protect material assets and minimise waste</p>	

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		<p>BAG Assessment: Minor Negative SA Assessment: Uncertain minor negative (-?)</p> <p>The vast amount of building sand which would be needed to develop a site of this size would need to be sourced locally, possibly from sites in Ryarsh, Borough Green or other local sites. Therefore although the material assets of Broadwater Farm may not be significantly impacted, materials would still have to be extracted locally having a harmful effect on the material assets elsewhere within Tonbridge and Malling .</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an approximate mix of sizes, types and tenures</p> <p>BAG Assessment: Uncertain minor positive (+) SA Assessment: Uncertain minor positive (+)</p> <p>No new evidence has been provided as to the mix of housing sizes, types and tenures, however based on the known housing mix proposed by Berkeley Homes for the land covered by this site, an assessment "Uncertain minor positive" does not seem unreasonable.</p>	
42544833	Annex 1	<p>SA Objective 2 - there are two major roads bordering this parcel of land, importantly providing ver easy access to the main M20/M25 links. it is likely that the A228 seven mile lane will require upgrading to allow for the additional traffic from the developments in and around Paddock wood so allowing for the transport link to be signifiacntly improved.</p> <p>SA Objective 9 - The land immediately adjacent labeled as mount pleasant farm is very poor agricultural land (Grade 3/4) and therefore with some reconsideration of the boundary the amount of Grade 1 land lost would be reduced.</p>	<p>SA objective 2 looks at people's access to services and facilities, and is informed by the Urban Capacity Study (July 2022). Although site 59806 may have good access to the main M20/M25 links, it has relatively poor access to everyday amenities and by more active and sustainable transport modes. Therefore, it is correct that the site receives a significant negative effect in relation to SA objective 2: services and facilities. Further to this, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. upgrades to the road network).</p> <p>The SA provides an appraisal of site 59806, not the adjacent Mount Pleasant Farm. Therefore, the SA does not contain an appraisal of this area.</p>
42687745	Annex 1	<p>Plan number 59770</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Rectory Lane, Ightham.</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective</p>

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		<p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p>	<p>are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, site 59770 has been appraised in line with the site assessment criteria. As the site is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

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		<p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p>	
42687457	Annex 1	<p>I am writing to OBJECT most strongly to the proposal to build in excess of 37 dwellings on Ismays Road, Ightham.</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Poor Accessibility Band. There are no public transport facilities within easy reach of this site</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this residential site will not directly influence sustainable economic growth or the delivery of employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis. Site 59608 received a mixed uncertain minor negative and negligible effect, as although it is not within Flood Zones 2 or 3, it partially falls within Source Protection Zone 3.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely (>=75%) within Flood Zone 1. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is called a brownfield site, but it is surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>The site will produce fewer than 100 dwellings. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>Ismays Road is very narrow. The impact on the environment of lorries and deliveries in such a confined space would be detrimental, even dangerous to the already eroding roadside edges and existing residential properties. The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>I object most strongly to PLAN 59608</p>	<p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, site 59608 has been appraised in line with the site assessment criteria. As the site is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>
42687457	Annex 1	<p>Plan number 59770</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Rectory Lane, Ightham.</p> <p>I am a resident.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public</p>

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		<p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p>	<p>transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, site 59770 has been appraised in line with the site assessment criteria. As the site is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential</p>

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		<p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p>	<p>sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>
42687457	Annex 1	<p>Plan number 59720 and 59871 Gracelands</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the Graceland's Sites 59720 and 59871</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>The proposal is for a total of 230 dwellings. On the assumption there would be on average 4 people per household, this would mean 1000</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the sites receive significant negative effects. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In the next iteration of the SA Report, site 59871 will receive an uncertain minor</p>

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		<p>more patients for the surgery - an increase of approximately 7% which is completely unsustainable.</p> <p>Objective 2</p> <p>The site is placed within the Fair Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon. There is absolutely no provision for the increased number of children at either Ightham or Borough Green primary schools. There is only one local secondary school and that too is already at capacity.</p> <p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area as they are residential sites.</p> <p>Objective 5</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 75\%$) within Flood Zone 1, but falls partially within zones 2 and 3. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains a significant proportion of agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p>	<p>negative effect, as the site is incorrectly recorded as containing a green infrastructure asset.</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites 59720 and 59871 have been appraised in line with the site assessment criteria. As these sites are not within 100m of an AQMA, they receive a negligible effect.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

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		<p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>The proposals for the development of these two sites will provide 230 houses. Whilst the sites alone might therefore be classed as suitable for providing housing of a suitable mix of type and tenure, the local infrastructure of schools, roads, medical facilities and drainage are completely unable to support a development of this size.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLANS 59720 and 59871</p>	
42687457	Annex 1	<p>Plan number 59709</p> <p>Dear Sir/Madam,</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Darkhill Farm plan number 59709</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>There is only one medical centre in the area - Borough Green Medical Practice. This surgery serves not only Ightham, but Borough Green, Wrotham and many of the outer villages such as Stansted and Fairseat. The practice already has in excess of 15,000 patients and last year there were over 96, 000 appointments on top of flu jab clinics and Covid injection clinics.</p> <p>It is already stretched to the limit and cannot sustain any more growth in the area.</p> <p>Objective 2.</p> <p>The site is placed within the Good Accessibility Band as there is access to the A25. However, public transport facilities are limited.</p> <p>Objective 3</p> <p>The site is not well placed for secondary schools in the area. Whilst there is a primary school, this is already at capacity. Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon.</p> <p>Objective 4</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The Urban Capacity Study (July 2022) was used to inform the assessments against SA objective 2: services and facilities. Public transport facilities are dealt with separately under SA objective 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to SA objective 8: water, these are 'policy-off' appraisals and so consideration is not given to mitigation. If the sites are allocated in the Local Plan via policy that contains mitigation measures, they will be appraised on a 'policy-on' basis.</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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		<p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. The proximity to these designated sites provides an indication of the potential for an adverse effect. The site also contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area. It is not located near any settlements and would result in the loss of designated open spaces.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely (>=25%) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is within 100m of an AQMA. (Air Quality Management Area) so this objective could be measured, but the impact would not be known until the development had taken place and if adverse, could not be reversed.</p> <p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>As yet, the proposals for the development of this land are unknown. However, if there is to be a substantial amount of housing, the area cannot sustain facilities for the housing or the infrastructure to</p>	<p>SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, site 59709 is located within 100m of an AQMA and so receives a significant negative effect in relation to this objective.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objectives 4: economic growth, 6: landscape and townscape, 7: heritage, 9: soil and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p>

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		<p>support it. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars on this road, and the existing infrastructure of schools, medical facilities and drainage cannot sustain it.</p> <p>The A25 is already a major bottle neck in the area for all through traffic from the M26 to and from Sevenoaks. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59770</p>	
42036737	Q7 of the questionnaire	<p>"We do not agree with the findings of the strategic policy option assessments as set out in table 5.1 in the Sustainability Report as they relate to site 59604 at Addington. We would comment as follows:</p> <p>SA2: Disagree. Expanding the settlement of Addington would allow for new facilities and services to be provided to the benefit of new and existing residents.</p> <p>SA5: Disagree. The land is pasture and is hemmed in between the A20 and the railway. Its development would have a negligible affect upon biodiversity and geodiversity. Indeed, its development and the implementation of a comprehensive landscaping scheme could well enhance biodiversity</p> <p>SA6: Disagree. The land is poor pasture and is hemmed in between the A20 and the railway. Its development would have a negligible effect upon the boroughs landscape. Indeed, through judicious landscaping it could improve it!</p> <p>SA7: Disagree. The development of the site would not impact upon cultural resources. The nearest listed building, Milestone is more than 500m away. The Addington Conservation Area is more that 700m away and the ancient monuments at Addington Long Barrow are more than 1200m away.</p> <p>SA9: Disagree: The site comprises poorly managed pasture. It is hemmed in by the A20 to the north and the railway line to the south. It does not form part of a larger agricultural holding. The land to the west is in residential use whilst to the east is woodland.</p> <p>SA13: Disagree. The land is hemmed in between the A20 and the railway. It is too small a site to be valuable for mineral exploitation.</p> <p>For some reason our submission under site refence 59606 (Employment Site) has not been recorded under table 5.2 in the Sustainability Report."</p>	<p>Table 5.1 in the Interim SA Report shows the effects each reasonable alternative development site option is likely to have in relation to the SA objectives. It does not present the findings of the strategic policy options assessments.</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, although the expansion of the settlement of Addington has the potential to allow for the provision of new facilities and services, the site is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. Therefore, it receives a minor negative effect in relation to SA2.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, development of the site has the potential to adversely effect the three areas of Ancient Woodland located within 250m of the site, e.g. through recreational disturbance. Although a landscaping scheme could enhance biodiversity within this site, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site has been appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 7: heritage, the site is located within 250m of two heritage assets, as recorded in Kent County Council's Historic Environment Record.</p> <p>With regard to SA objective 9: soils, the site has been appraised in line with the site assessment criteria. Please refer to the Agricultural Land Classification for further information on this.</p> <p>With regard to SA objective 13: material assets and waste, the site has been appraised in line with the site assessment criteria.</p> <p>Site 59606 is a duplicate of 59604. 59604 is the definitive reference number for this site.</p>

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25390689	Q7 of the questionnaire	<p>"How can building near a station be the sole criteria for measuring the impact of a development on Climate Change? The loss of large areas of green field and the use of large amounts of concrete will also have an impact.</p> <p>The loss of habitat and habitat connectivity are more than a minor negative impact. The health of the planet depends on a healthy environment."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The SA is limited in how it can appraise the sustainability of reasonable alternative development site options, as it relies on the physical characteristics of an area and the data available to measure the sustainability effects that development might have. Proximity to railway stations is considered a reasonable proxy for helping to identify whether a site may reduce reliance on the private car and associated emissions. The SA acknowledges where greenfield land may be lost to development, in addition to surface water runoff.</p> <p>The SA framework comprises a set of 14 SA objectives. SA objective 5 seeks "To protect and enhance biodiversity and geodiversity". In the site assessment criteria presented in Appendix D of the Interim SA Report, sites that are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites, receive an uncertain significant negative effect. Sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or that are within 250m of locally designated sites, receive an uncertain minor negative effect. Sites containing an existing green infrastructure asset that could be lost as a result of new development also receive an uncertain significant negative effect.</p> <p>In the next iteration of the SA Report, the criteria for SA14 will be updated so that sites receive an uncertain significant negative effect when they contain a locally designated site.</p>
42342977	Q7 of the questionnaire	<p>"My No above is not absolute.</p> <p>My principle concern is that I have not found a commitment to a Brownfield first policy. This issue is a vital strategic sustainability Option but not without its own problems of viability and perversely often biodiversity complications.</p> <p>Apart from my comment above my answers, to the Quantum Options is agreed.</p> <p>To the Spatial Options I think SA 6 for Option 1 should be moved to Significant Negative Effect Likely. The Landscape in the northern part of the Borough is dominated by the view from the AONB and development in the part of the view unprotected by AONB or Green Belt should be preserved</p> <p>I do not have sufficient knowledge of Tonbridge to comment.</p> <p>I think that the Anti Coalescing Options are right but in Option 14 we should give weight to adjusting the Green Belt to accommodate brownfield sites in the green belt and move the Green Belt out to compensate. I also don't feel that we should underrate the need to provide village accommodation for those who want to live in a rural environment rather than a town created by coalescing villages."</p>	<p>With regard to brownfield land, it is not the purpose of the SA to set out policy constraints, rather it is the purpose of the Local Plan</p> <p>Support noted, with regard to the appraisal of Quantum Options.</p> <p>With regard to SA objective 6: landscape and townscape, it is acknowledged that the landscape in the northern part of the Borough is dominated by the view from the AONB. Spatial Option 1 is considered to have an uncertain minor negative effect in relation to SA objective 6, as unlike the other Spatial Options, there is a specific focus on ensuring that any development is located outside of the AONB. The SA acknowledges that some adverse landscape impacts may still occur (paragraph 4.25).</p> <p>With regard to the respondent's comment on the Green Belt, the Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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42387809	Q7 of the questionnaire	<p>"For Options 4 and 5, SA1 does not take into account that these are rural areas so any development is going to be within reach of a footpath or open space but will reduce the wellbeing of residents by removing that countryside. Cycle tracks do not exist and roads are narrow lanes and unsafe for walking as a form of transport so health and wellbeing are not enhanced except for recreational purposes using tracks and muddy footpaths.</p> <p>SA3 does not consider the actual distance to any schools, only line of site which is many times less in some places.</p> <p>SA5, 6, 7, 8, 10, 12 in rural areas, such as considered for development in Options 4 and 5 there can be no positive environmental result from any large development,</p> <p>SA10 takes account of distance to bus stop but not the frequency of buses or useful routes so no real world measurement of use. Most developments on Options 4 or 5 would result in 2 cars per household in order to get to schools, work, shops etc.</p> <p>SA14 takes no account of rural areas where it costs a lot in terms of transport to get to work or school so making it unaffordable for less well off to live there.</p> <p>Options 1,2,3 all assume that necessary infrastructure, often on a large scale, will be forthcoming. in view of the lack of money in either local or national government budgets this seems unlikely.</p> <p>SA8 Water quantity is not considered, only quality and overall quantity is fully stretched at present and climate change is likely to exacerbate this.</p> <p>SA 10,11,12 Greenhouse gas emissions are only considered with respect to traffic, not the effects of heating homes."</p>	<p>Spatial Options 4 and 5 do not solely support development in rural areas. They also support development on sites within and adjacent to urban and rural service centres. These options would not necessarily result in the removal of substantial areas of countryside.</p> <p>The spatial options are too high-level to consider distance to schools. However, the distance individual site options are to primary and secondary schools is considered in Chapter 5 of the Interim SA Report, as well as Annex 1 which contains the proformas for each reasonable alternative development site option.</p> <p>The SA does not record any positive effects against SA objectives 5: biodiversity, 6: landscape, 7: heritage and 8: water. Minor positive effects are recorded in relation to SA objectives 10: climate change mitigation and 12: air quality because including larger settlements ensures that residents have a reduced need to travel to access services and facilities, and will most likely have better access to sustainable transport links. This will reduce air pollution associated with use of the private car. These positive effects are, however, coupled with negative effects. Spatial Options 4 and 5 and expected to have significant negative effects in relation to SA objectives 10 and 12 whereas Spatial Options 1, 2 and 3 are expected to have minor negative effects in relation to SA objective 10 and 12.</p> <p>Due to the high-level nature of the spatial options, specific reference is not given to proximity to bus stops or bus service frequency. However, the proximity of reasonable alternative development site options to bus stops is considered in Chapter 5 and Annex 1 of the Interim SA Report. With regard to the reasonable alternative development site options, SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>SA objective 14 seeks "To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures". Transport is instead covered under SA objectives 2: services and facilities and 10: climate change mitigation. In the next iteration of the SA, the cost of living crisis will be acknowledged in the baseline information section of the SA.</p> <p>With regard to SA objective 8: water, the baseline information section refers to water quantity.</p> <p>SA objectives 10 and 11 refer to greenhouse gas emissions in general, which includes emissions associated with buildings. The appraisal of spatial options is too high-level to give consideration to emissions associated with buildings.</p>

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42446049	Q7 of the questionnaire	<p>"I think that the sustainability appraisal report is overly-optimistic in its appraisal of both options, and does not appear to have been based on any hard evidence e.g. traffic surveys, air quality monitoring. I do not believe that any meaningful dialogue can have taken place with local healthcare commissioners or providers, given that the report says</p> <p>""As with healthcare, this extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities"" . This is naive and unrealistic in the current financial climate. How are these new services to be funded? Securing one-off capital for a token new GP surgery will not address the chronic shortage of hospital beds, operating theatres, maternity delivery rooms, local health and social care community services or mental health services, for which significant additional revenue funding will be required. To ignore this will simply result in adverse impacts on the quality and availability of healthcare for local residents.</p> <p>Similarly, the report is over-optimistic in relation to transport. It states that both options ""are likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents'. All we have seen recently is a reduction in the availability of bus transport. Our trains do not provide useful services across T&M, with most lines running into London, and quite infrequently. Cycling is dangerous on the overcrowded A roads on which T&M relies."</p>	<p>The SA utilises a precautionary approach and is therefore not overly-optimistic in its appraisal of the Regulation 18 Local Plan.</p> <p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>To inform plan-making, the Council will commission additional evidence on matters including traffic and air quality.</p> <p>Due to the high-level nature of the quantum options, it is common to make assumptions regarding sufficient critical mass to support the delivery of new essential services and facilities.</p> <p>With regard to transport, there is potential for masterplanning of large sites to secure opportunities and investment to support sustainable transport provision/improvements.</p>
42443169	Q7 of the questionnaire	<p>The overall assessment of impact is too positive, regardless of option. The overriding assumption is that present health care and general infrastructure is sufficient in meeting this housing need. It is not. Where is there and NHS dentist locally, when we're wait times to see a GP less than 2 weeks. I could go on. The point is that any increased development will have a negative impact. Objective 10 will never be positive as any build will increase our carbon footprint as the building industry is not operating at net zero The technologies are not developed to do so. There is no uncertainty about this. Objective 14 has nothing to do with sustainability but everything to do about suitability of the possible developed housing stock. It should therefore be excluded.</p>	<p>The SA utilises a precautionary approach and is therefore not overly-optimistic in its appraisal of the Regulation 18 Local Plan.</p> <p>Due to the high-level nature of the quantum options, it is common to make assumptions regarding service capacity. The SA acknowledges that delivering growth beyond assessed needs has potential to cause capacity issues if existing healthcare facilities remain at current levels (paragraph 4.6 of the Interim SA Report). However, additional growth would be expected to deliver infrastructure provision/improvements to support it. Quantum Option 1 is recorded as having a minor positive effect in relation to SA objective 1: health and wellbeing, whereas Quantum Option 2 is recorded as having a mixed minor positive and uncertain negative effect in relation to SA objective 1.</p> <p>Although the quantum options receive minor positive effects in relation to SA objective 10: climate change mitigation, they are also expected to have negative effects as "New housing growth in the borough is likely to result in increased transport movements to access workplaces, and services and facilities day-to-day. A significant proportion of these trips are likely to be taken using private car given that a greater percentage of individuals in the borough commute to work using private car when compared to the national average" (paragraph 4.8). Further to this, the SA states "In the case of Option 2, the negative effects identified are potentially significant as going beyond assessed needs has particular potential to cause increased congestion on key routes within the borough". Although the SA does</p>

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			<p>not reference building emissions here, this would not alter the effects already recorded for both Options in relation to SA10.</p> <p>Housing provision is considered a sustainability issue and therefore SA objective 14: housing should be retained.</p>
42562465	Q7 of the questionnaire	There is no legend or explanation for the scoring marks of this section so it is unclear what the summary means without having to read all of 4.6-- 4.10. However, I cannot see how any of the objectives (except 4 & 14) can possibly be achieved in an existing built-environment by adding yet more additional building.	<p>Table 2.1 in Chapter 2 of the Interim SA Report provides a key to the symbols and colour coding used throughout the SA.</p> <p>The SA objectives provide a framework against which the effects of the Local Plan will be assessed. The SA objectives and sub-objectives act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.</p>
42616929	Q7 of the questionnaire	I neither agree or disagree in one sense (I couldn't untick the no -to put a neutral answer)-- the initial sustainability assessment for each site is specific to that sites and appears to be a good start on each place. The overall set of assessments (ch 4 of the sustainability appraisal) is quite complex and I would not feel fully qualified to comment on it. (eg colour coding I am not sure is clearly explained?)	Noted.
42641409	Q7 of the questionnaire	I have answered 'no' here as I do not believe the 'findings' of the strategic policy options assessments are meaningful being simply a series of pluses, minuses and in some cases zeros often accompanied by a question mark. The broad thrust is that any development would strengthen economic opportunities while putting strains on infrastructure and being detrimental to the character and natural sustainability of the Borough. To me the analysis is simply too vague to merit endorsement.	<p>Table 2.1 in Chapter 2 of the Interim SA Report provides a key to the symbols and colour coding used throughout the SA.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p>
42649601	Q7 of the questionnaire	SA objectives 5-- 13, the extra 10% housing would definitely be more detrimental to biodiversity, geodiversity and greenhouse gases. I can see no reason why air quality would not be detrimentally effected by greater housing density, as more people means more transport which is particularly important as a large proportion of the population work outside of the borough and there are a limited number of over congested A roads in the borough.	<p>Quantum Options 1 and 2 both receive an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity because there is potential for them to cause loss of habitats and habitat connectivity.</p> <p>Quantum Option 2 receives a significant negative effect in relation to SA objectives 10: climate change mitigation and 12: air quality whereas Quantum Option 1 receives a minor negative effect in relation to these two objective. As such, the SA does reflect the fact that the higher the number of new homes, the more adverse effects there are likely to be in relation to air quality. The SA states "In the case of Option 2, the negative effects identified are potentially significant as going beyond assessed needs has particular potential to cause increased congestion on key routes within the borough" (paragraph 4.8).</p>
42713473	Q7 of the questionnaire	<p>"Site 59761</p> <p>By developing this site every one of the below sub objectives will be significantly negatively impacted upon.</p> <p>Destroying the woodland which destroy biodiversity, it will destroy locaql wildlife including endangered species-- bats, newts, owls, and rare birds.It will destroy wildlife corridors and will take away open space used for sports (objective 2)</p>	The quantum options, spatial options, future development of Tonbridge options and the options to prevent merging of settlements in the north-east of the borough are appraised against the SA Framework provided in Chapter 3 of the Interim SA Report, which contains numerous sub-objectives. The reasonable alternative development site options are appraised against the site assessment criteria contained within Appendix D of the Interim SA Report.

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		<p>Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Sub-Objectives</p> <p>To protect and enhance designated sites of nature conservation importance.</p> <p>To protect and enhance wildlife especially rare and endangered species.</p> <p>To protect and enhance habitats and wildlife corridors.</p> <p>To provide opportunities for people to access wildlife and open green spaces.</p> <p>To increase biodiversity net gain.</p> <p>To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.</p> <p>To protect, enhance and expand ecological networks and their interconnectivity.</p> <p>Conservation of biodiversity, including priority habitats and species, under the NERC Act (S41).</p> <p>To protect and enhance sites designated for geodiversity"</p>	<p>Site 59761 is recorded in the Interim SA Report as likely to have an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity due to the fact the site contains Ancient Woodland and is within 250m of a Local Wildlife Site (Mereworth Woods) and some additional areas of Ancient Woodland.</p>
25205729	Q7 of the questionnaire	<p>"See comment on the quantum options above.</p> <p>In terms of options the sustainability appraisal cannot make any detailed assessment because of the lack of knowledge on what area of the borough would be impacted-- as evidenced by the large number of question marks on the appraisal grid. I don't see this as a productive exercise at this stage.</p> <p>I am also unclear on the weighting to be given to the various sustainability objectives to enable comparisons between options to be properly evaluated-- a 250 page sustainability report, and even an 80 page 'non-technical summary', does not make it easy to assess the process or provide effective commentary."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>The quantum options have been appraised on the basis that they would have a wide range of effects across the SA objectives. However, it is recognised that there is considerable uncertainty depending on the eventual location of housing development. As such, a number of the effects are recorded as uncertain.</p>
42443361	Q7 of the questionnaire	<p>"+ There are inaccuracies in the Sustainability Appraisal for various strategic & individual sites.</p> <p>+ For example, the train station indicated at Watlingbury is NOT in Tonbridge & Malling Borough but in Maidstone.</p> <p>+ Further, the Station is in Green Transport/walking/cycling distance of only a very few areas/sites. The Station has a very small Car Park (shared with the local School)</p> <p>+ In the case of some site assessments has been inaccurately considered-- one INDICATIVE example is Appendix B Site 59803 stated as within 800m of the station when in fact only a very small remote corner of the site may be within a arc as the crow flies."</p>	<p>The railway station the respondent refers to is located within the boundaries of Tonbridge and Malling Borough. However, even if the railway station were located within Maidstone Borough, residents living within Tonbridge and Malling would still likely access it.</p> <p>With regard to the respondent's comment on site 59803, the SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater."</p>
42720577	Q7 of the questionnaire	<p>"Under SA objective 6 there should be reference to protection of the Green Belt. The National Planning Policy Framework states that the fundamental aim of Green Belt policy is to prevent urban sprawl and</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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		<p>is characterised by openness and permanence, and that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.</p> <p>As stated in Table 1, Spatial Portrait, Tonbridge and Malling is rural in character, therefore many residents depend on private cars because the option to use public transport is either minimal or non-existent. As a result the SA objectives should include improvements to highway infrastructure to reduce traffic congestion, this would improve air quality and reduce emissions."</p>	<p>SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The sub-objective "To minimise traffic congestion" has been added to the SA framework under SA objective 10: climate change mitigation.</p>
42721729	Q7 of the questionnaire	<p>"I don't believe that removing green spaces meets objective 5</p> <p>I don't believe that adding more traffic to the roads, more human need for services that will not be met and removal of green spaces will meet objective 1"</p>	<p>The SA objectives provide a framework against which the effects of the Local Plan will be assessed. The SA objectives and sub-objectives act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.</p> <p>SA objective 5 seeks to protect and enhance biodiversity and geodiversity and the Interim SA Report appraises each aspect of the Regulation 18 Local Plan (September 2022) against this objective. In Chapter 4 of the Interim SA Report to which this comment relates, the quantum and spatial options all receive significant negative or minor negative effects in relation to SA objective 5 due to the land take on mostly greenfield land for housing and employment development.</p> <p>With regard to the future development of Tonbridge options, the first of these two options seeks to optimise densities on sites within the town centre and therefore minimises the overall release of greenfield land and for this reason, receives a minor positive effect against SA objective 5. The second of these two options seeks to conserve densities on sites within the town centre and therefore increases the need for the release of greenfield land for development and so receives a minor negative effect.</p> <p>With regard to the options to prevent merging of settlements in the north-east of the borough, two of these three options receive a minor positive effect in relation to SA objective 5 as they offer protection to greenfield land from development. The remaining option receives a minor negative effect as it is likely to result in development coming forwards on greenfield land.</p> <p>SA objective 1 seeks to improve human health and well-being but does not specifically look at traffic. It is acknowledged in Chapter 4 of the Interim SA Report that growth in the borough has the potential to support the delivery of new services and Quantum Options 1 and 2 would provide the critical mass needed to support provision of health and wellbeing related infrastructure. For this reason, both quantum options receive minor positive effects in relation to SA objective 1. However, Quantum Option 2 also receives a minor negative effect in relation to SA objective 1, as the SA acknowledges that delivering growth beyond assessed needs has the potential to cause capacity issues with service provision.</p> <p>The SA does not specifically look at traffic levels but to inform plan-making, the Council will commission additional evidence on traffic.</p>

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42443041	Q7 of the questionnaire	Difficult to understand what you mean by this question but my view of the Sustainability Appraisals is that they are very crude and in some places state either 'strong positive or strong negative' which is completely useless, and also they have rated being within 800m of a bus service as a strong positive without looking at: how to reach the bus stop? how often the bus runs? where it goes? and how much does it cost? Rural bus services are EXTREMELY expensive and therefore only really of use to secondary school children and those who are in receipt of a free bus pass. They are certainly not an alternative to travelling by private car which remains far cheaper if you live far away from a town.	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distance from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>The cost of living crisis is now acknowledged in the baseline information section of the SA.</p>
42729633	Q7 of the questionnaire	<p>"Option 4 has scored relatively badly against the other 4 options considered by TMBC. However, it is considered that it should score more positively in the SA, particularly because impacts arising from this strategy cannot be assessed until sites have been selected. With specific regard to SA objective 4 "To encourage sustainable economic growth, business development, and economic inclusion across the borough" the distribution of development through site allocations across the borough can encourage sustainable development and growth in a variety of areas where it is needed rather than specifically in and around larger settlements that may already be sustainable. Equally this objective specifically refers to "across the borough" so a strategy of this nature – supporting sustainable growth of a variety of businesses including viticulture, does meet this objective.</p> <p>Further comments will be provided in relation to the SA at a later stage of the plan when proposed site allocations are set out to reflect the various growth strategies."</p>	The Spatial Options have been appraised on the basis that they would have a wide range of effects across the SA objectives. It is recognised that there is considerable uncertainty depending on the eventual location of housing development. As such, a number of the effects are recorded as uncertain.
42768289	Q7 of the questionnaire	No. As a policy analyst, the qualitative projections are meaningless. For instance quantum option 2 (with 10% increase) scores the same -- as option 1 despite the fact that it projects a further 10% increase. In the spatial options, how do options 1-3 score positively on objectives 1-3 but +/- on 4 and 5?	<p>Due to the high-level nature of the quantum options, qualitative analysis is utilised. Although Quantum Option 2 proposes meeting the assessed housing need plus 10%, Quantum Option 1 often receives the same effects as Quantum Option 2 as the SA utilises a precautionary approach. Further to this, the eventual location of housing development for both options is not yet known.</p> <p>The reason why Spatial Options 1 to 3 receive minor positive effects against SA objectives 1: health and wellbeing, 2: services and facilities and 3: education, and Spatial Options 4 and 5 receive mixed minor positive and minor negative effects against these objectives is because Options 1 to 3 direct development towards the larger settlements within the borough where there is a wider range of key services and facilities available. Although Spatial Options 4 and 5 also direct development towards the larger settlements, they also direct</p>

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			development towards the rural settlements in the borough and so residents in these areas may have poorer access to key services and facilities.
25351073	Q7 of the questionnaire	<p>"The SA lacks sufficient evidence on Green Belt and climate change.</p> <ul style="list-style-type: none"> Without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important, development of the options and then choice of an option is premature in advance of this study. Please refer to responses under Q40 and 41. There is no climate change evidence base or topic paper. This would have indicated the patterns of growth that would be most efficient in reducing the existing carbon footprint and providing the lowest impact for the future. The Sustainability Appraisal (SA) (Appendix C) is not detailed enough for this to be reliably accurate. Without a climate evidence base, the Sustainability Appraisal scores on the impact of each option on the carbon footprint is meaningless. Therefore this consultation does not give consultees the opportunity to choose an option that demonstrates the lowest carbon footprint, except in a very superficial way." 	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to climate change, the Council has commissioned evidence on this topic to support development of the Local Plan and this will feed into the baseline information contained within the next iteration of the SA.</p> <p>It is important to note that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers when selecting preferred options for a plan.</p>
42736321	Q7 of the questionnaire	<p>"In respect of the spatial assessment, as set out in table 4.2:</p> <p>For options 4 and 5, it seems more likely that SA Objectives 2 and 3 would be negative. The use of a multitude of sites which would require a large number of different facilities and education establishments to be expanded or improved. In reality (budget, space and practical constraints) it is unlikely this would result in improvements to the many facilities, but only a few meaning that the majority are left without improvement needed to support the new developments. Many villages (e.g. Ightham, Offham) have minimal community facilities or services and a larger number of individuals trying to access and use them is unlikely to result in improvements or equality for all.</p> <p>For example, developments in Ightham couldn't result in an increase in school places as the school lacks the physical space to be able to increase any intakes. Pupils would therefore be required to travel outside the village and further spread across surrounding schools to the detriment of others (with a domino affect)."</p>	<p>Spatial Options 4 and 5 are recorded as having minor negative effects in relation to SA objectives 2: services and facilities and 3: education for the reasons set out in Chapter 4 of the Interim SA Report, although these effects are coupled with minor positive effects. Paragraph 4.2 of the Interim SA Report states "Options 4 and 5 also set out that growth will be directed to the urban areas and rural service centres and therefore minor positive effects are identified for these strategy options in relation to SA objective 1, 2 and 3. However, these strategy options will also focus growth to other rural settlements in the borough, which may result in some residents having poorer access to key services and facilities. As a result, minor negative effects are also identified for Options 4 and 5 in relation to SA objectives 1, 2 and 3".</p> <p>Due to the high-level nature of the SA, it is common to make assumptions regarding sufficient critical mass to support the delivery of new essential services and facilities.</p>
42651521	Q7 of the questionnaire	<p>"Table 4.1</p> <p>In terms of table 4.1 and options 1-3, it is not agreed that "delivering growth beyond assessed needs has more potential to cause capacity issues" as providing in all likelihood by less housing the Council will largely continue trends of concealed households and people either sharing houses or living at home for longer – but it's not considered that this leads necessarily to a change in the impact on healthcare or education provision. Indeed, if people are in crowded living conditions then there may be adverse effects in terms of mental and physical health, leading to a greater strain on healthcare facilities.</p>	<p>Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Quantum Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1 to 3.</p> <p>With regard to SA objectives 10: climate change mitigation and 12: air quality, providing more housing as proposed under Quantum Option 2 is likely to increase the number of cars on the road and associated emissions. As Option 2 proposes more development than Option 1, it is expected to have more significant effects than Option 1.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>New development will of course deliver funding or new facilities, and thus it is unclear why it is considered that additional requisite capacity would not be provided.</p> <p>In terms of objectives 10 and 12, relating to air quality and greenhouse gas emissions – providing more housing provides greater choice and opportunity for people to live near work or family. As such it is not considered that more housing will have an adverse effect in this regard and it may indeed be better to deliver more housing options for people in sustainable locations – particularly where rail travel can be facilitated.</p> <p>Table 4.3</p> <p>The assessment needs to reflect better the significant impact that over-densification could have on the townscape of Tonbridge, and the delivery of large quantities of housing that are not market-facing in the post-pandemic world.</p> <p>There is of course a place for flats and redevelopment of brownfield land, but there needs to be opportunities for people to grow families within the principal town by delivering a mix of housing on greenfield sites that can deliver new services and facilities and enhance access to and the enjoyment of the countryside as part of development.</p> <p>We would also highlight a concern that under objective 4, there may be significant pressures on less valuable uses to be redeveloped for residential – which could lead to the loss of jobs and services in the town through new development."</p>	<p>Without knowing where housing development will be located, it is difficult to reflect the effect Quantum Options 1 and 2 will have on the landscape. For this reason, both options are recorded as having mixed minor positive and uncertain minor negative effects in relation to SA objective 6: landscape and townscape.</p>
42776289	Q7 of the questionnaire	<p>"No – Option 2 provides the scenario that will deliver the required Objectively Assessed Housing Need ('OAHN') (839 dpa) +10%. Whilst the additional mass could put local services/infrastructure under pressure, this could be mitigated through financial contributions from the developers and a robust and clear infrastructure delivery strategy that supports this level of growth. As set out in the response to Question 6, the OAHN should be a minimum and through the emerging Local Plan, there is an opportunity to ensure local services/infrastructure are enhanced and deliver what is required to support growth in a sustainable manner – this includes the enhancement to local services/infrastructure.</p> <p>In respect of Objective 10 (to reduce greenhouse gas emissions) and 12 (to improve air quality) – whilst providing over and above the OAHN, as set out in the Sustainability Appraisal, development is "likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents" .</p> <p>Therefore, to support the Local Plan, it is vital that the Council brings forward an Infrastructure Delivery Plan ('IDP') to identify the infrastructure/local services required to support the growth scenario chosen (either Option 1 or Option 2). In the expectation that an IDP is brought forward alongside the preference for growth to be</p>	<p>Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Quantum Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>With regard to SA objectives 10: climate change mitigation and 12: air quality, providing more housing as proposed under Quantum Option 2 is likely to increase the number of cars on the road and associated emissions. As Option 2 proposes more development than Option 1, it is expected to have more significant effects than Option 1.</p>

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		distributed across the Borough, we do not consider Option 2 should be scored less positively than Option 1."	
25369441	Q7 of the questionnaire	<p>Although we have answered 'no' in most cases the option assessments are supported and the findings appear reasonable and logical.</p> <p>We do however query the assessment provided in Table 4.2 under criteria SA9 "9: To conserve and enhance soil resources and guard against land contamination".</p> <p>Here Options 1, 3, 4 and 5 are all listed as likely to result in 'Significant negative effects' whilst Option 2 is listed as "mixed significant negative and minor positive effects". There does not appear to be any relevant evidence to justify the more positive categorisation of Option 2 in this regard.</p> <p>We submit that Option 2 should be categorised alongside the other options under this heading"</p>	<p>Noted.</p> <p>As stated in paragraph 4.26 of the Interim SA Report, "For Option 2, a minor positive effect is also identified in relation to SA objective 9 as the greater focus on the larger urban areas in the borough may encourage a higher share of previously developed land that comes forward for development".</p>
42822561	Q7 of the questionnaire	<p>This chapter is very complex and not easy to follow, but as an example, SA Objective 3 uses distance to a school as one of its positives, whilst acknowledging that a whole range of other factors (such as school capacity) haven't been taken into consideration. Distance can only be a positive if a school is both appropriate and has capacity. The same applies to SA2, SA4, SA10 (access to buses is a myth-- there may be bus stops, but services have been slashed) etc. Air Quality and climate change need to be specifically addressed. Maybe the SA objectives could come with the imposition of regulations (e.g. planning regulations) which enforce compliance.</p>	<p>The Spatial Options are too high-level to consider distance to schools. However, the distance individual site options are to primary and secondary schools is considered in Chapter 5 of the Interim SA Report, as well as Annex 1 which contains the proformas for each reasonable alternative development site option. As stated in the SA (paragraph D.14 of the Interim SA Report), all effects against SA objective 3: education are recorded as uncertain, as they depend on there being capacity at schools to accommodate new pupils.</p> <p>With regard to SA objective 2: services and facilities, the spatial options have been appraised in terms of generalised access to services and facilities. They are too high-level to consider the capacity of specific services and facilities.</p> <p>SA objective 4 relates to economic growth and due to the fact that all spatial options will deliver housing and employment land within the borough, which will provide a range of housing types and employment opportunities for residents, they are expected to have significant positive effects against SA4. These significant positive effects are coupled with minor negative effects for Spatial Options 1, 4 and 5. Option 1 may be too constrained in its focus on growth in the north-east of the borough and within Tonbridge, whilst Options 4 and 5 include smaller rural settlements and so may result in development coming forward that is poorly connected to the main employment locations.</p> <p>The five spatial options are expected to have negative effects in relation to SA objective 10: climate change mitigation, as they may cause increased congestion on key routes within the borough, as there is a strong reliance on private car within the borough. They also support development in locations that could exacerbate existing air quality concerns, as there are numerous AQMAs in the borough. Spatial Options 4 and 5 are recorded as having significant negative effects in relation to SA10, as they direct growth towards rural settlements and new settlements where there is lower service and</p>

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			<p>facility provision, and may therefore encourage private car travel. The negative effects for all five spatial options are coupled with minor positive effects, as they all incorporate larger settlements where residents will have a reduced need to travel to access services and facilities, and will have access to sustainable transport links. All effects are uncertain as they are dependent on the exact location of new development.</p> <p>The spatial options are too high-level to consider distance to bus stops. However, the distance of individual site options to bus stops is considered in Chapter 5 of the Interim SA Report, as well as Annex 1 which contains the proformas for each reasonable alternative development site option. With regard to the reasonable alternative development site options, SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>It is not the purpose of the SA to impose regulations. The SA objectives provide a framework against which the effects of the Local Plan will be assessed. Chapter 6 of the Interim SA Report does, however, list indicators for monitoring the performance of the Local Plan.</p>
42824737	Q7 of the questionnaire	<p>"While we agree with the general conclusions in respect of the 'Spatial Options' set out in Chapter 5 of the 'Interim Sustainability Appraisal Report' (Aug 2022) ('ISA'), we do not agree wholly with the 'Quantum Options' being tested and the scoring of Option 2 as well as some of the scoring for 'Options to prevent merging of settlements in the North-East of the Borough'.</p> <p>Quantum Options</p> <p>As set out in our representations, an option should be tested where the Council seek to meet the uncapped standard method figure plus a buffer for non-delivery. As aforementioned, a cap is applied in the standard method to help ensure the minimum local housing need figure is as 'deliverable as possible' but does not 'reduce housing need itself' (PPG ID:2a-007). The ISA needs to test this option to fully account for the true level of housing needs in the Borough.</p> <p>Notwithstanding, we agree that there is no option considered for going below the capped standard method figure given the local housing pressures and Government objectives.</p> <p>Scoring of the Quantum Options</p>	<p>Support noted, regarding the spatial options.</p> <p>The quantum options subject to SA were identified by TMBC. It is reasonable, as a starting point, for one quantum option to be the assessed need generated by the Government's standard method. Quantum Option 2 is the assessed need + up to 10% therefore providing a buffer.</p> <p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA utilises a precautionary approach and therefore both options are expected to have a significant negative effect. There is uncertainty regarding the eventual location of housing development and so the effects are recorded as uncertain. Although new developments can achieve net gains in biodiversity, the overall amount of development proposed is likely to result in adverse effects on biodiversity and geodiversity.</p> <p>With regard to SA objectives 4: economic growth and 14: housing, the uncertain minor negative effects recorded for the first two options to</p>

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		<p>In respect of Objectives 1, 2 and 3 we disagree with the scoring for Option 2. For all three objectives, the option is scored as potentially having a minor negative effect due the potential to cause capacity issues. However, new developments – particularly more comprehensive schemes – can deliver new facilities or contribute to the provision of upgraded ones. The conclusion that there may be a minor negative effect assumes that there would not be a commensurate upgrade in facilities.</p> <p>We also disagree with the conclusions in respect of Objective 5 for both Options 1 and 2. New developments can achieve significant biodiversity net gains. Developments can also appropriately mitigate landscape and heritage impacts.</p> <p>Options to prevent merging of settlements in the North-East of the Borough?</p> <p>Finally, we note that the three options to prevent the merging of settlements in the North-East of the Borough. We agree that extending the green belt (option 1) or implementing a gap policy (option 2) would have negative effects in meeting Objectives 4 (encouraging sustainable development) and 14 (providing suitable supply of high-quality housing). However, we would conclude that both options would have significant negative effects on both objectives and should be scored with “- -” instead of “-”.</p>	<p>prevent merging of settlements in the north-east of the borough, are considered sufficient.</p>
25361537	Q7 of the questionnaire	<p>In respect of Objective 6-- To protect and enhance the borough's landscape and townscape character and quality, the AONB unit agree that both Growth Options have potential to have significant negative effects and that this may be particularly significant under option Two as a result of the higher amount of land take/growth. In respect of the five proposed Spatial Options we generally agree with the assessment and associated commentary (and caveats) provided in paragraph 4.25, although would raise some concerns that potential impacts on AONB setting may be underassessed (see our comment on D22 of Objective 6 in Appendix D of the Interim SA).</p>	<p>Support noted, with regard to the appraisal of quantum options.</p> <p>With regard to the spatial options, all but one of them (Options 1) receive a significant negative effect in relation to SA objective 6: landscape and townscape. There is uncertainty regarding the eventual location of housing development and so the effects are recorded as uncertain. Spatial Option 1 receives an uncertain minor negative effect in relation to SA objective 6, as unlike the other spatial options, there is a specific focus on ensuring that any development is located outside of the AONB. The SA acknowledges that some adverse landscape impacts may still occur (paragraph 4.25) and this includes on the setting of the AONB.</p>
42714529	Q7 of the questionnaire	<p>It is not clear what is meant by 'agree with the findings'.... if you want me to say: yes, I agree with 'Option X' t=in order to indicate that I would like Option X, then NO, I don't agree with any of the options.</p> <p>However, YES I do agree with many of the findings of the Sustainability Appraisal Report, including:</p> <p>QUANTUM OPTIONS:</p> <p>Table 4.1</p> <p>BOTH options will have Significant Negative Impact on:</p> <p>5. Biodiversity & Geodiversity,</p> <p>6. Character of landscape and townscape character & quality</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Support noted, with regard to the appraisal of quantum and spatial options.</p>

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		<p>7. Cultural heritage</p> <p>9. Soil resources</p> <p>BOTH options will have negative impact on:</p> <p>8. Water features and resources</p> <p>11. Climate change impact</p> <p>13. Protection of material assets and minimising waste</p> <p>... all just to improve 14. housing ??? This is NOT SUSTAINABLE</p> <p>SPATIAL OPTIONS</p> <p>Again I agree that all 5 Options are assessed as having NEGATIVE impact on 5.Biodiversity 6. Landscape quality 7. Cultural heritage 8. Water resources 9. Soil resources 11. Impact on climate change 13. Material assets and waste</p> <p>It is pretty clear from the Sustainability Report that NONE of the housing increase options are in Sustainable.</p>	
25386625	Q7 of the questionnaire	<p>"Berkeley generally agrees with the methodology and findings of the Interim Sustainability Appraisal (ISA), except for some site-specific matters, which are explored in response to question 8.</p> <p>The ISA has assessed the options presented in the consultation document and demonstrates that there are advantages and disadvantages to each. As further work is undertaken in narrowing the strategic policy, and spatial strategy, options there will, of course, need to be further analysis through the SA process.</p> <p>As highlighted in Berkeley's responses to questions 5 and 6, further and more detailed analysis of housing needs is necessary and more uplift options will need to be justified and tested through the SA."</p>	Noted.
43485985	Q7 of the questionnaire	<p>"1.2.25 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.26 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.27 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.

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		1.2.28 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions."	
43487649	Q7 of the questionnaire	<p>"No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.30 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.31 The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.32 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions."</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
43514945	Q7 of the questionnaire	<p>"No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing.</p> <p>However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.31 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.32 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.33 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.

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		more balanced assessment it represents an unsound assessment upon which to base future decisions."	
41998081	Q7 of the questionnaire	<p>"No. The ISA Assessment seems to be based on unevidenced assumptions. For example, the ISA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%).</p> <p>1.2.50 A minor positive effect is identified for both option 1 and option 2 in relation to SA objective 1: health and wellbeing. However, in the case of option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Page 15 of 26</p> <p>1.2.51 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.52 The same principle applies with provision of new essential services and education and training facilities, with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.53 In our view the ISA looks unreasonably negatively on growth and development rather than looking in an impartial manner or a basis for opportunity. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions"</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
43635649	Q7 of the questionnaire	<p>"Coalescence of Communities</p> <p>We would encourage policy decisions to prevent coalescence of the separate and differing communities of West Malling, East Malling, Kings Hill and hamlets such as those at New Barns, Mill Street etc.</p> <p>The Broadwater Farm area with its bridleways and footpaths acts as a green wedge between East and West Malling, Larkfield and Kings Hill – all very different communities with their own local heritage and character.</p> <p>Any development in this area would sever the continuity of landscape and irrevocably alter the nature, ambience and quietude of the surrounding environment, to the lasting detriment of existing communities.</p> <p>High Grade Farmland</p>	<p>Chapter 4 of the Interim SA Report provides an appraisal of three options for preventing the merging of settlements in the north-east of the Borough.</p> <p>The SA gives consideration to the Agricultural Land Classification under SA objective 9: soil.</p> <p>The SA provides an appraisal of two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. There is no reference to a 30% increase in housing allocations.</p>

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		<p>At a time when we are being urged to consider nature, conserve farming and food production ... and yes, save the planet ... we should be protecting our high grade agricultural lands at Broadwater and Eden Farms</p> <p>Increase in Housing Allocation</p> <p>Challenge the 30% increase TMBC's housing allocation from 56096 to 72000+</p> <p>From every angle, an increase in housing allocation can only be viewed as a strange madness. The increased volume of housing and attendant infrastructures threaten to utterly destroy the character, and crucially, the viability of this already overburdened part of our Kentish borough.</p> <p>Spread of Development</p> <p>Where development is deemed both appropriate and necessary, we believe it needs to be spread more fairly and evenly across the borough."</p>	
42832833	Q7 of the questionnaire	<p>"Option 2 provides the scenario that will deliver the required Objectively Assessed Housing Need ('OAHN') (839 dpa) +10%. Whilst the additional mass could put local services/infrastructure under pressure, this could be mitigated through financial contributions from the developers and a robust and clear infrastructure delivery strategy that supports this level of growth. As set out in the response to Question 6, the OAHN should be a minimum and through the emerging Local Plan, there is an opportunity to ensure local services/infrastructure are enhanced and deliver what is required to support growth in a sustainable manner – this includes the enhancement to local services/infrastructure.</p> <p>In respect of Objective 10 (to reduce greenhouse gas emissions) and 12 (to improve air quality) – whilst providing over and above the OAHN, as set out in the Sustainability Appraisal, development is “likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents”.</p> <p>Therefore, to support the Local Plan, it is vital that the Council brings forward an Infrastructure Delivery Plan ('IDP') to identify the infrastructure/local services required to support the growth scenario chosen (either Option 1 or Option 2). In the expectation that an IDP is brought forward alongside the preference for growth to be</p>	Noted.

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		distributed across the Borough, we do not consider Option 2 should be scored less positively than Option 1."	
43779649	Q7 of the questionnaire	<p>"Berkeley generally agrees with the findings for the strategic options. The findings and associated scores in the Interim Sustainability Assessment Report (SA) suggests that Option 1 is the more favourable Quantum Option, outscoring Option 2 in 6 separate SA Objectives (Objective 1,2,3,10,12 and 14). However, a buffer would allow further flexibility and resilience to the housing supply within the Local Plan. As the plan progresses, the SA may benefit from further review and a more positive score could be considered for Quantum Option 2.</p> <p>As discussed within question 4, Berkeley's preferred spatial strategy option is Spatial Strategy Option 3. This is because this option enables development of both previously developed and greenfield land whilst focusing such development around towns and rural service centres that have the infrastructure to support growth.</p> <p>The SA findings for the Spatial Options within the SA scored SSO 2 and 3 as the highest scoring spatial strategy options. Option 3 directs development towards the urban areas and rural service centres within the borough respectively, where there is a wider range of key services and facilities. This is likely to provide residents within developments with opportunities to easily accessible services."</p>	<p>It is noted that a buffer could allow further flexibility and resilience to housing supply.</p> <p>Noted.</p>
24986657	Q7 of the questionnaire	<p>"The SA lacks sufficient evidence on Green Belt and Climate change. Without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important, development of the options and then choice of an option is premature in advance of this study. Please refer to responses under Q40 and 41.</p> <p>There is no climate change evidence base or topic paper. This would have indicated the patterns of growth that would be most efficient in reducing the existing carbon footprint and providing the lowest impact for the future. The Sustainability Appraisal (SA) (Appendix C) is not detailed enough for this to be reliably accurate. Without a climate evidence base the Sustainability Appraisal scores on the impact of each option on the carbon footprint is meaningless and based on guess work. Therefore this consultation does not give consultees the opportunity to choose an option which demonstrates the lowest carbon footprint, except in a very superficial way."</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>With regard to climate change, the Council has commissioned evidence on this topic to support development of the Local Plan and this will feed into the baseline information contained within the next iteration of the SA.</p>
42380353	Q7 of the questionnaire	<p>"The SA lacks sufficient evidence on Green Belt and climate change.</p> <ul style="list-style-type: none"> Without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important, development of the options and then choice of an option is premature in advance of this study. Please refer to responses under Q40 and 41. There is no climate change evidence base or topic paper. This would have indicated the patterns of growth that would be most efficient in reducing the existing carbon footprint and providing the lowest 	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>With regard to climate change, the Council has commissioned evidence on this topic to support development of the Local Plan and this will feed into the baseline information contained within the next iteration of the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		impact for the future. The Sustainability Appraisal (SA) (Appendix C) is not detailed enough for this to be reliably accurate. Without a climate evidence base the Sustainability Appraisal scores on the impact of each option on the carbon footprint is meaningless. Therefore, this consultation does not give consultees the opportunity to choose an option which demonstrates the lowest carbon footprint, except in a very superficial way."	
43629217	Q7 of the questionnaire	"Gladman broadly agree with the findings of the strategic policy option assessments in Chapter 4 of the Interim Sustainability Appraisal Report (ISA), however, have some concerns regarding the methodology. Harm being assessed as minor or significant whilst also being a determined 'potential' suggests a nuance that has not been fully explored. It is not robust to determine the scale of a harm that may or may not occur, whilst referencing that there is the potential for mitigation. Gladman recommend the ISA is reviewed before the next round of consultation to ensure that it is clear how the conclusions have been reached. This will allow the preferred options to be suitably assessed."	SA is a high-level tool used to help identify the likely sustainability effects of a plan. It is therefore normal for the SA to include references to "potential" issues and effects.
44236769	Q7 of the questionnaire	<p>"● Para. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough covers the area bounded by East Malling, West Malling and Kings Hill, i.e. Broadwater Farm.</p> <ul style="list-style-type: none"> ● Options 1 and 2 maybe essential policy options for the North-East of the Borough, but we wholeheartedly disagree that already built up areas should be further densified. ● Adoption of "no special protection" Option 3 would lead to significant harm, ● Expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan. ● Expansion of buildings from East Malling through to West Malling by the building on 40 Acres and Winterfield would be in direct contravention of the stated preferred strategy not to coalesce communities." 	<p>The Interim SA Report identifies three options to prevent merging of settlements in the north-east of the Borough: (1) Extend the outer edge of the Green Belt; (2) An anti-coalescence/strategic gap policy; (3) No change to the existing Green Belt boundary and no gap policy.</p> <p>With regard to densifying existing built up areas, it is assumed that this comment instead relates to the two options for future development of Tonbridge. The SA provides an appraisal of these different options to help the Council establish a way forward regarding future development.</p>
42684641	Q7 of the questionnaire	No I don't agree with the Interim Sustainability Report Chapter 4 as TMBC in 4.19 want to make a case to use Greenbelt. A case may be made for west Malling , Borough Green and Hildenborough as these towns have a rail station BUT only on sites close to the rail stations/ industrial sites or poor land would need to be identified.	Paragraph 4.19 of the Interim SA Report refers to greenfield land, not the Green Belt – although this option is likely to include some Green Belt land. Greenfield is a land use classification whereas Green Belt is a policy designation. The Green Belt contains both greenfield and brownfield land.
44274145	Q7 of the questionnaire	<p>"The Council sets out its intention that it will need to consider the use of greenfield sites, within and beyond existing built up areas rather than just previously developed land just around Tonbridge. This assertion is wholeheartedly endorsed and it is considered that this will ensure that a sufficient distribution of housing development can be provided across the plan period.</p> <p>When considering the Council's analysis of Option 4, it is not considered that the apparently computer generated assessment is</p>	<p>The appraisal of Spatial Option 4 has not been computer generated.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is. It is recognised that there is considerable uncertainty depending on the eventual location of housing development. As such, a number of the effects are recorded as uncertain.</p> <p>A number of effects in the site-specific appraisals are also recorded as uncertain, as they are dependent on various details that will be</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>balanced. The ability of more intimate objectives to be discerned, cannot be undertaken on a strategic basis. The implications of biodiversity, cultural heritage, water feature impacts, air quality factors to name but a few, can only be analysed on a site-specific basis rather than at a strategic level, as each individual site will be different. The inclusion of a question mark, which deciphers as 'likely effect uncertain' in the vast majority of the objective outcomes beyond 5, does not promote confidence in the summary analysis and highlights this.</p> <p>When cross referencing the objectives back to the site specific analysis, further uncertainties are still identified, providing an even further lack of confidence in the process. It is maintained that Option 4 has been considerably underestimated and disparagingly 'marked' by the overall analysis. The negative impacts identified and marked as uncertain, are disputed. The ability to provide sites in a distributed way across the borough does not automatically mean that negative impacts will occur in terms of strategic objectives 5,6,7,8,9,10,11,12 and 13 as this will be site specific."</p>	<p>confirmed at planning application stage. Further to this, they are 'policy-off' appraisals and so consideration is not given to mitigation, which could resolve some of the uncertainty. If any of the sites are allocated in the Local Plan via policy that contain mitigation measures, they will be appraised on a 'policy-on' basis.</p>
44275681	Q7 of the questionnaire	<p>"Whilst we note that the SA acknowledges at para 4.5 that 'the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative', and agree with that statement; we are, as set out above, somewhat confused as to whether the SA has in fact tested the effects of delivering the LHN figure + 10% or a supply that is 10% above the HLN which is a different scenario.</p> <p>11</p> <p>With the above in mind, we fail to see why table 4.1 suggests that Option 1 (LHN) scores a minor positive for objectives 1, 2 and 3, yet Option 2 (LHN+10%) scores a mixed minor effect for all three. Option 2 in providing more housing has the ability to help to address the issue of affordability and thus improve the health and well-being of those in housing need, especially the homeless (SA objective 1). Para 4.6 appears to totally ignore the issue of affordability and its effects on health or indeed the fact that housing actively contributes to the delivery of health services. Likewise Option 2 has the greater ability to improve equality and access to community facilities and services (SA objective 2) than Option 1, given its ability to address the issue of homelessness and affordability which we note is a sub objective of objective 2 according to p70 of the SA. Furthermore, Option 2 would definitely help address the need to provide a suitable supply of high quality housing, including an appropriate mix of sizes, types and tenures (SA objective 14). Why Option 2 scores a significant positive (likely effect uncertainty) when Option 1 also scores a significant positive is truly bizarre. Whilst we note that para 4.9 of the SA suggests that the scale of housing delivery associated with Option 2 is 'in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study', and that as a result there is 'uncertainty attached to this option as there is a question mark around its deliverability'; this is not in our</p>	<p>The SA has tested the effects of delivering: (1) assessed need; and (2) assessed need + up to 10%, therefore providing a buffer.</p> <p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>Quantum Options 1 and 2 will both provide a significant amount of new housing and therefore both receive a significant positive effect in relation to SA objective 14: housing. In terms of Quantum Option 2 delivering more housing than Quantum Option 1, the SA acknowledges in paragraph 4.9 that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents" [emphasis added].</p> <p>Although the significant positive effect for Quantum Option 2 against SA objective 14 is recorded as uncertain, this is not a reduction to its score as suggested by the respondent. Uncertain significant effects are still considered as likely significant effects in the SA. The SA states in paragraph 4.9 (see above quote) that Quantum Option 2 has a particularly significant positive effect. The reasoning behind the uncertain effect is appropriate.</p> <p>Spatial Option 3 does perform very strongly in relation to the SA objectives compared to the other options, as does Spatial Option 2. It is important to note that SA is a high-level tool used to identify the likely sustainability effects of a Local Plan, and is one of many factors that feed into the plan-making process.</p>

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		<p>opinion a reason for the SA to reduce the score attributed to Option 2. Deliverability is an issue for the planning authority in determining the spatial strategy – not the SA. To this end we note that the Housing Market Delivery Study (HMDS) examines past delivery rates and use these to make assumptions as to the capacity of the area to deliver homes in the future. Whilst helpful to understand the rate at which homes have been delivered in the past, we would argue against whether this should</p> <p>be used as an indication of future delivery rates. The ability of an area to support housing growth will relate principally to the range of sites allocated through the chosen spatial strategy rather than an innate capacity in the market as to the amount of growth that can be achieved. The Council should not be seeking to limit growth on the basis of what has been achieved in the past.</p> <p>The Assessment of the Spatial Options</p> <p>Reviewing table 4.2 spatial Option 3 (Development focused on sites within as well as adjacent to defined urban and Rural Service Centre settlements) appears to attain the most positive scores, with equal top scores in respect of SA objectives 1, 2, 3, 4, 5, 7, 8, 10, 11, 12, 13 and 14, and second equal on SA objectives 6 and 9. On this basis it would appear to us to be the option that most closely meets the SA objectives, and it is surprising that the SA does not actually say this explicitly.</p> <p>In addition to the above we are, we have to say, somewhat perplexed as to how spatial Option 1 scores so highly on SA objective 2 (to improve equality and access to community facilities and services) when, by directing most growth towards the northern part of the Borough it will not address the affordability issues in the southern part of the Borough, which given the southern part of the Borough's location within the WKHMA and thus the amalgam of the 3 least affordable Boroughs/ district in the county, would suggest anything that directs growth away from this area should obtain a much lower score. To this end we note that para 4.18 of the SA highlights the fact that there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis within the HMA's and that a sustainable pattern of development should seek to address the need where it arises, i.e. within each HMA. Spatial Option 1 simply would not do this and would exacerbate the affordability issue within the southwestern part of the Borough, where it is at its most acute.</p> <p>12</p> <p>With regard to the Future Options of Tonbridge, Section 11 of the NPPF requires planning policies to promote an effective use of land in meeting the need for homes and other uses and paragraph 124 sets out key considerations that should be taken in this regard. Furthermore, NPPF paragraph 125 states: "plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination"</p>	<p>The Council is not considering a brownfield alone approach, as there would not be enough land to provide the housing needed. As such, this approach is not considered a reasonable alternative.</p> <p>Affordability is not addressed under SA objective 2: services and facilities, and is instead addressed under SA objective 14: housing. Affordability is an issue across the Borough.</p>

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		<p>It then follows that, the optimisation of densities on development sites within Tonbridge (Option 1) is recognised on the basis that the best use of previously developed land clearly scores well in SA terms.</p> <p>However, this does not mean that a brownfield alone approach should be taken given that an insufficient amount of sites within the urban area have been identified to accommodate the growth within the Urban Capacity Study and notwithstanding the complexities that can arise with brownfield sites that can affect delivery rates. It is essential that a sufficient amount and variety of land can come forward where it is needed in accordance with NPPF paragraph 60. It should also be noted that the delivery of Brownfield land can be longer due to the risks of complications during construction given the nature of the previous use."</p>	
44309601	Q7 of the questionnaire	<p>"Chapter 4 appears to try to compare options with no specific conclusions. However, there are concerns that the descriptions are not balanced.</p> <p>With regards to Kings Hill, CP11 deprecates any development outside of the town itself, CP12 similarly constrains development around West Malling and CP13 should be considered.</p> <p>The road network around Kings Hill does not support expansion; there are no properly accessible points to link in any significant development without congestion and safety issues being created.</p> <p>There are excessive active travel issues; Kings Hill is not effectively connected to the cycle and public footpath network, and joint use of pavements for pedestrians and cyclists where the pavements do not meet the guidelines for such use, impacts take-up of active travel, and discourages walking and access for disabled people.</p> <p>Kings Hill Parish Council would like to highlight that the KCC plan for cycle connectivity for the previous decade has not been implemented; this would have resulted in significant improvements. In addition,</p> <p>Kings Hill Parish Council considers that the developer obligation to link onto the public footpath network has not been effectively addressed. These issues are resulting in rapidly deteriorating infrastructure for active travel which needs to be addressed as a matter of urgency."</p>	<p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p> <p>The SA is too high-level to give consideration to specific road networks and congestion. However, in the site-specific appraisals, consideration is given to the proximity of sites to existing walking and cycling paths. It will be the role of the Local Plan to help address the active travel issues mentioned by the respondent.</p>
44304385	Q7 of the questionnaire	<p>"Chapter 4 appears to try to compare options with no specific conclusions. However, there are concerns that the descriptions are not balanced.</p> <p>With regards to Kings Hill, CP11 deprecates any development outside of the town itself, CP12 similarly constrains development around West Malling and CP13 should be taken into account.</p> <p>The road network around Kings Hill does not support expansion; there are no properly-accessible points to link in any significant development without congestion and safety issues being created.</p> <p>There are excessive active travel issues; Kings Hill is not effectively connected to the cycle and public footpath network, and joint use of pavements for pedestrians and cyclists where the pavements do not</p>	<p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p> <p>The SA is too high-level to give consideration to specific road networks and congestion. However, in the site-specific appraisals, consideration is given to the proximity of sites to existing walking and cycling paths. It will be the role of the Local Plan to help address the active travel issues mentioned by the respondent.</p>

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		<p>meet the guidelines for such use, impacts take-up of active travel, and discourages walking and access for disabled people.</p> <p>Kings Hill Parish Council would like to highlight that the KCC plan for cycle connectivity for the previous decade has not been implemented; this would have resulted in significant improvements. In addition, Kings Hill Parish Council considers that the developer obligation to link onto the public footpath network has not been effectively addressed. These issues are resulting in rapidly deteriorating infrastructure for active travel which needs to be addressed as a matter of urgency."</p>	
44336545	Q7 of the questionnaire	<p>"Yes. We largely agree with the findings of the strategic policy options which demonstrates Option 2 and Option 3 are the most sustainable. However, we recommend Option 3 is the preferred option and should be pursued as part of the spatial strategy, for the following reasons:</p> <ul style="list-style-type: none"> • Option 3 promotes sustainable development in the Borough. It directs development towards Tier 1 (Urban Areas) and Tier 2 (Rural Service Centres) settlements which have the best range of key services and facilities. • Option 3 ensures a dispersed pattern of growth. It spreads development across 10 settlements in the Borough and ensures a balanced distribution of development. • Option 3 ensures a wider range of types of sites and development will come forward. • Option 3 provides a balanced distribution of development across the two Housing Market Areas ('HMA's'). • Option 3 would likely only require minor alterations to the Green Belt and Exceptional Circumstances exist in order to do so. • Option 3 provides less / no-reliance on larger strategic sites to achieve development needs. Larger sites can often be slow to deliver and can cause delays to meeting housing needs in full. <p>3.75 Based on the above reasons (which are discussed in detail within our response to Question 4), we recommend the findings of the Interim Sustainability Appraisal ('SA') are used to inform the spatial strategy. As we discuss at Question 3 and 4, spatial strategy Option 3 is pursued as part of the new Local Plan, with Option 4 as the second favourable option. Options 1, 2 and 5 should be dismissed. These are also the least sustainable against the objectives of the SA."</p>	Noted.
44403137	Q7 of the questionnaire	<p>"No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.

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		<p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities, with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions."</p>	
44406689	Q7 of the questionnaire	"Assessment assumes that defined Urban Areas have the services and infrastructure to support further expansion. West Malling and Kings Hill transport infrastructure, medical facilities are unable to support existing number of residents and dwellings. Major expansion of North East TMBC would cause coalescence of communities, in direct contravention of the stated preferred strategy of the Local Plan."	Noted.
24927329	Q7 of the questionnaire	<p>"28. The assessment of strategic policy options in the SA provides some assistance as to the difference in environmental effects between the options, but it is clearly a very high level analysis and based on subjective judgment without any detail and with a great level of uncertainty. Nor are any of the various SA objectives weighted therefore a comparison between the options is problematic. There is also a great deal of uncertainty expressed within the options, making comparisons between options problematic at this stage. It is assumed that this will be addressed through further refinement of the SA process.</p> <p>29. For example, the difference between the Housing Quantum strategic options (providing for assessed need or providing for assessed need +10%) indicates some greater negative potential effects of a higher level of growth (for example, or air quality) although with uncertainty attributed to most objectives. The provision of the additional 10% will result in greater benefits to Objective 14 (providing for housing) and Trenport would advocate that this objective must be given substantial weight in the overall analysis.</p> <p>30. In terms of the Spatial Options, clearly this is a 'policy off' analysis and therefore ignores the impact of each of the options on the Green Belt. Whilst Options 2 and 3 would appear to perform better in terms of the SA objectives, they would result in a much greater and unjustified level of Green Belt release."</p>	<p>Due to the high-level nature of the strategic policy options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>The Interim SA Report provides an appraisal of five different spatial options, none of which refer to development in the Green Belt.</p>
44412897	Q7 of the questionnaire	"No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst

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		<p>10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner."</p>	also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
44416033	Q7 of the questionnaire	<p>"No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and Option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than Option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under Option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner."</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
44426049	Q7 of the questionnaire	<p>"The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst

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		<p>option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities, with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions."</p>	<p>also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p>
44460673	Q7 of the questionnaire	<p>"3.6 Whilst the Interim Sustainability Appraisal Report provides an assessment of options for future housing need, it is concerning that TMBC has not identified how employment needs will be addressed at this stage of the Local Plan process. Further work should be undertaken in this regard to ensure that the Sustainability Appraisal has tested the environmental impact of various quantum options for employment need.</p> <p>Spatial options</p> <p>3.7 It is considered that a combined approach of Options 4 and 5 should be progressed to meet the development needs of the Borough to ensure that sustainable growth in urban and rural areas is supported through a combination of spatial options."</p>	<p>The employment evidence available at Regulation 18 stage did not take into account supply and so the SA did not appraise options for future employment need. Further work is underway and once available, different options for future employment need will be appraised to inform the Local Plan.</p>
44417409	Q7 of the questionnaire	<p>"a) The Assessment of the Quantum Options</p> <p>7.1 Whilst we note that the SA acknowledges at para 4.5 that 'the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative', and agree with that statement; we are, as set out above, somewhat confused as to whether the SA has in fact tested the effects of delivering the LHN figure + 10% or a supply that is 10% above the LHN which is a different scenario.</p>	<p>The SA has tested the effects of delivering the LHN figure + 10%, not a supply that is 10% above the LHN.</p> <p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>Quantum Options 1 and 2 will both provide a significant amount of new housing and therefore both receive a significant positive effect in relation to SA objective 14: housing. In terms of Quantum Option 2 delivering more housing than Quantum Option 1, the SA</p>

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		<p>7.2 With the above in mind, we fail to see why table 4.1 suggests that option 1 (LHN) scores a minor positive for objectives 1, 2 and 3, yet option 2 (LHN+10%) scores a mixed minor effect for all three. Option 2 in providing more housing has the ability to help to address the issue of affordability and thus improve the health and well-being of those in housing need, especially the homeless (SA objective 1). Para 4.6 appears to totally ignore the issue of affordability and its effects on health or indeed the fact that housing actively contributes to the delivery of health services. Likewise option 2 has the greater ability to improve equality and access to community facilities and services (SA objective 2), than option 1 given its ability to address the issue of homelessness and affordability, which we note is a sub objective of objective 2 according to p70 of the SA. Furthermore, option 2 would definitely help address the need to provide a suitable supply of high quality housing, including an appropriate mix of sizes, types and tenures (SA objective 14). Why option 2 scores a significant positive (likely effect uncertainty) when option 1 scores a significant positive is truly bizarre. Whilst we note that para 4.9 of the SA suggests that the scale of housing delivery associated with option 2 is 'in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study', and that as a result there is 'uncertainty attached to this option as there is a question mark around its deliverability'; this is not in our opinion a reason for the SA to reduce the score attributed to option 2. Deliverability is an issue for the planning authority in determining the spatial strategy – not the SA. To this end we note that the Housing Market Delivery Study (HMDS) examines past delivery rates and uses these to make assumptions as to the capacity of the area to deliver homes in the future. Whilst helpful to understand the rate at which homes have been delivered in the past, we would against whether this should be used as an indication of future delivery rates. The ability of an area to support housing growth will relate principally to the range of sites allocated through the chosen spatial strategy rather than an innate capacity in the market as to the amount of growth that can be achieved. The Council should not be seeking to limit growth on the basis of what has been achieved in the past.</p> <p>b) The Assessment of the Spatial Options</p> <p>7.3 Reviewing table 4.2 spatial option 3 (Development focused on sites within as well as adjacent to defined urban and Rural Service Centre settlements) appears to attain the most positive scores, with equal top scores in respect of SA objectives 1, 2, 3, 4, 5, 7, 8, 10, 11, 12, 13 and 14, and second equal on SA objectives 6 and 9. On this basis it would appear to us to be the option that most closely meets the SA objectives, and it is surprising that the SA does not actually say this explicitly.</p>	<p>acknowledges in paragraph 4.9 that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents" [emphasis added].</p> <p>Although the significant positive effect for Quantum Option 2 against SA objective 14 is recorded as uncertain, this is not a reduction to its score as suggested by the respondent. Uncertain significant effects are still considered as likely significant effects in the SA. The SA states in paragraph 4.9 (see above quote) that Quantum Option 2 has a particularly significant positive effect. The reasoning behind the uncertain effect is appropriate.</p> <p>Spatial Option 3 does perform very strongly in relation to the SA objectives compared to the other options, as does Spatial Option 2. It is important to note that SA is a high-level tool used to identify the likely sustainability effects of a Local Plan, and is one of many factors that feed into the plan-making process.</p> <p>Affordability is not addressed under SA objective 2: services and facilities, and is instead addressed under SA objective 14: housing. Affordability is an issue across the Borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>7.4 In addition to the above we are, we have to say, somewhat perplexed as to how spatial option 1 scores so highly on SA objective 2, (to improve equality and access to community facilities and services) when, by directing most growth towards the northern part of the Borough it will not address the affordability issues in the southern part of the Borough, which given the southern part of the Borough's location within the WKHMA, and thus the amalgam of the 3 least affordable Boroughs/ district in the county, would suggest anything that directs growth away from this area should obtain a much lower score. To this end we note that para 4.18 of the SA highlights the fact that there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis within the HMA's and that a sustainable pattern of development should seek to address the need where it arises, i.e. within each HMA. Spatial option 1 simple would not do this and would exacerbate the affordability issue within the south western part of the Borough, where it is at its most acute.</p> <p>7.5 We have no comments on the Future Development of Tonbridge Options or the Options to Prevent Merging of Settlements in the North-East of the Borough."</p>	
44471521	Q7 of the questionnaire	<p>"No – Option 2 provides the scenario that will deliver the required Objectively Assessed Housing Need ('OAHN') (839 dpa) +10%. Whilst the additional mass could put local services/infrastructure under pressure, this could be mitigated through financial contributions from the developers and a robust and clear infrastructure delivery strategy that supports this level of growth. As set out in the response to Question 6, the OAHN should be a minimum and through the emerging Local Plan, there is an opportunity to ensure local services/infrastructure are enhanced and deliver what is required to support growth in a sustainable manner – this includes the enhancement to local services/infrastructure.</p> <p>In respect of Objective 10 (to reduce greenhouse gas emissions) and 12 (to improve air quality) – whilst providing over and above the OAHN, as set out in the Sustainability Appraisal, development is "likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents".</p> <p>Therefore, to support the Local Plan, it is vital that the Council brings forward an Infrastructure Delivery Plan ('IDP') to identify the infrastructure/local services required to support the growth scenario chosen (either Option 1 or Option 2). In the expectation that an IDP is brought forward alongside the preference for growth to be distributed across the Borough, we do not consider Option 2 should be scored less positively than Option 1."</p>	Noted.
44459553	Q7 of the questionnaire	"No – in relation to Quantum of development. No comments are raised in relation to the spatial options.	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>No – in relation to the Quantum of development. The ISA assessment seems to be based on unevidenced assumptions. For example, the ISA tests Option 1 (meeting development needs) and Option 2 (meeting development needs plus 10%).</p> <p>A minor positive effect is identified for both Option 1 and Option 2 in relation to ISA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than Option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under Option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities, with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In Fernham Homes' view - in terms of quantum of development - the ISA looks unreasonably negatively on growth and development rather than looking in an impartial manner or a basis for opportunity. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>No comments are raised in relation to the findings for the spatial options. It is noted that Options 2 Urban and 3 Urban and RSCs perform most strongly – which are reflective of Fernham Homes' conclusions in relation to the most appropriate strategy as outlined above."</p>	
44514401	Q7 of the questionnaire	<p>"Chapter 4 sets out the sustainability appraisal findings for the strategic policy options that have been considered and presents the findings for those options. The options for the scale of growth and spatial strategy for the Local Plan has been grouped as – quantum options; spatial options; the future development of Tonbridge; and options to prevent the merging of settlements in the north-east of the borough.</p> <p>Paragraph 32 of the Framework states:</p> <p>"Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets</p>	<p>The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities. Therefore, the minor positive effect against SA objective 1: health and wellbeing for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in health and other services and facilities becoming overloaded. The same applies in relation to SA objectives 2: services and facilities and 3: education. The SA also acknowledges in paragraph 4.6 that with regard to Quantum Option 2 "...this extent of new growth in the borough has the potential to provide sufficient critical mass to</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the relevant legal requirements¹⁹. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)."</p> <p>At paragraph 4.5 of the Interim Sustainability Appraisal Report, the Council confirm that</p> <p>"No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the evidence shows is needed. In these circumstances, the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative."</p> <p>We support the Council's position on seeking to deliver the housing need in full across the plan period, and agree that there is sufficient available and suitable land within the Borough to deliver that identified need, and a reasonable alternative would not include delivering below the minimum level of identified housing need.</p> <p>We do, however, question the evidence behind the findings of the Sustainability Appraisal for the options, particularly paragraph 4.6 which states that Option 2 (Meeting Assessed Housing Need + up to 10%) could be more likely to overwhelm existing services and facilities and schools. This is unsubstantiated. It is also of course the case that appropriate new development will deliver new facilities such that services are not overwhelmed. The provision of such facilities as part of some larger developments (such as the previous allocation at Borough Green) will also enhance the relative sustainability of some of the smaller settlements in their hinterland i.e. such as Wrotham for example."</p>	<p>support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p>
42271969	Q7 of the questionnaire	<p>"Question 7 asks if respondents "agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report" and seeks an explanation of views.</p> <p>Quantum Options</p>	<p>The quantum options subject to SA were identified by TMBC. It is reasonable, as a starting point, for one quantum option to be the assessed need generated by the Government's standard method. Quantum Option 2 is the assessed need + up to 10% therefore providing a buffer.</p> <p>The assessed need + 10% was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>In terms of the quantum of overall housing, Vistry do not agree with the scope of the options presented and assessed within the Interim SA. A particular concern (as detailed in our response to Question 6), is that the SA only considers options to either meet the minimum Standard Method housing need figure, or to exceed that figure by 10%.</p> <p>The Interim SA certainly provides a clear justification for not exploring options to promote development below the 839 dpa Standard Method figure. This is justified through references to worsening levels of housing affordability and national planning policies. The document also explains (at paragraph 4.4) that a figure of up to 10% above the evidence-based needs is to be tested, "to see what is realistically achievable in the context of the local housing markets and being mindful of the need for flexibility to be able to adapt to rapid change."</p> <p>However, the selection of only a 10% increase appears arbitrary and this scenario should have been considered alongside options for further uplifts (i.e., over and above a 10% increase). Indeed, noting that a 20% buffer is currently applied for the purposes of calculating the 5YHLS position, it is not clear why an option for a 20% increase was not tested. It would also be appropriate to test the effects of an increased housing requirement to support Duty-to-Cooperate discussions with neighbouring Local Authorities.</p> <p>With respect to Table 4.1, Vistry are unconvinced by the suggestion that an increase of 10% (i.e., 1,594 dwellings) would result in significantly greater effects or impacts, when compared to the baseline Standard Method figure of 15,941. The assumption made in respect of SA Objectives 1, 2, and 3, appears to be that additional growth (above the baseline) will place increase pressure on services and infrastructure.</p> <p>However, the reasoning set out in the Interim SA (at paragraphs 4.6 to 4.10) appears to ignore the potential for increased housing delivery to facilitate additional infrastructure, in the form of new health centres, community facilities and schools, etc. Vistry suggest then that Option 2 (+10% housing growth), should be scored more positively than Option 1 in respect of SA objectives 1 to 3.</p> <p>Similarly, it is counter-intuitive to assume that an option for a higher level of housing growth would result in worsened Climate Change and air quality outcomes. Ultimately, the impacts of increased levels of growth will depend on the subsequent strategy for distribution.</p>	<p>higher growth figures on. An even higher growth scenario of assessed need + 20% would not yield particularly different SA effects to Quantum Option 2, as both options are relatively similar and so it would be difficult to distinguish between the effects each is likely to have.</p> <p>The SA acknowledges that an increase of 10% has more potential to cause capacity issues with existing services and facilities. However, it also acknowledges that with regard to an increase of 10%, the Borough "has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>With regard to climate change, Quantum Option 2 receives a significant negative effect (as part of a mixed effect) because a higher level of housing growth is likely to result in increased transport movements, as there will be more people with private cars and a subsequent increase in CO₂ emissions. This will contribute to climate change, as well as poor air quality – particularly as there are seven Air Quality Management Areas (AQMAs) within the Borough.</p> <p>Spatial Option 1 receives a minor positive effect in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education because similar to Spatial Options 2 and 3, directs development to the north-east of the Borough, in close proximity of the larger settlements in the Borough, and urban areas like the Medway Gap and Snodland, and Chatham and Maidstone just outside the Borough.</p> <p>Spatial Option 5 is likely to have a significant negative effect (as part of a mixed effect) against SA objective 10: climate change mitigation because it will direct some growth towards rural settlements where there is lower service and facility provision, which is likely to increase private car travel.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>The respondent has suggested that a strategy for meeting needs through a coordinated cross-boundary strategy should be explored. As TMBC seek to meet their OAN themselves, this is not considered a reasonable alternative option that should be subject to SA.</p>

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		<p>For example, it is a reasonable supposition that a higher housing requirement is likely to result in additional allocations for larger-scale developments. Such larger-scale developments tend to provide greater potential to enhance public transport, improve pedestrian / cycle connectivity, etc. This is likely to reduce the potential consequence to Climate Change and air quality impacts. Indeed, there are latent opportunities to maximise the benefits from existing transport nodes within the Plan-area. This includes at Hildenborough, where there is a clear opportunity to deliver rail-centric growth.</p> <p>Spatial Options</p> <p>Vistry consider that the Interim SA (at Table 4.2) provides an overly favourable assessment of Option 1, which would see growth restricted to areas beyond the Green Belt and AONB. This would mean that the majority of the Plan-area will not experience the benefits of housing and employment growth. The supply of new homes within the Sevenoaks and Tunbridge Wells HMA would be particularly constrained.</p> <p>Option 2 and particularly Option 3, would see new development distributed more widely, such that benefits relating to human health and well-being, access to services and educational attainment, are likely to be increased. It is not clear then why Spatial Option 1 is scored equally to Options 2 and 3, when tested against SA objectives 1 to 3.</p> <p>A further comment is that the Interim SA's scoring of Option 5 (New Settlement) appears arbitrary. For example, it is not clear why a new settlement or Garden Village urban extension, result in less favourable climate change outcomes when assessed against SA Objective 10. Indeed, a new strategic scale development of this nature is likely to be situated near existing or potential future transport nodes and would therefore promote sustainable transport patterns. They also offer clear ability to integrate site-specific and strategic scale mitigation cohesively, offering potential for significant environmental benefits to be delivered.</p> <p>The arbitrary nature of the scoring in the Interim SA again points to the lack of supporting technical evidence to justify the options presented. In addition, Vistry would also raise a broader concern, which is that none of the identified options (or alternative options), explore a strategy for meeting needs through a coordinated cross-boundary strategy.</p> <p>Whilst progressing such a cross-boundary strategy evidently presents political challenges, it is precisely the absence of such a strategy which resulted in the withdrawal of previously submitted Plans in both</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		Tonbridge and Malling, and in Sevenoaks District. This issue is also one of the key risks facing the submitted Tunbridge Wells Local Plan, which is currently at Examination."	
43544961	Q7 of the questionnaire	"See response to Q.6. We suggest further (higher) reasonable alternative growth options should be tested through the SA, following additional assessments and liaison with adjoining LPAs. With respect to Table 4.1 of the SA, we are unclear why Option 2 would score less than Option 1 for SA Obj. 2, as additional growth would help fund additional community facilities through the IDP. The same could be said with respect to SA Obj 3 and education. SA Obj. 4 is scored the same, but delivering more affordable housing in highly accessible locations may well support a greater economically active resident workforce, and hence assist economic growth and climate change objectives. For similar grounds it is arguable whether SA Obj. 10 and 12 would score so much worse if needs we being met in sustainable locations, particularly when coupled with the transition to more energy efficient homes and transport."	<p>The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing services and facilities. Therefore, the minor positive effect against SA objective 2: services and facilities for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in services and facilities becoming overloaded. The SA also acknowledges in paragraph 4.6 that with regard to Quantum Option 2 "...this extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities". The same applies to SA objective 3: education.</p> <p>Negligible effects are recorded against SA objective 4: economic growth, as these options focus on the quantum of housing and not the quantum of employment development.</p> <p>With regard to the spatial options, they will all deliver housing and employment land within the Borough, which will provide a range of housing types and employment opportunities for residents. As a result, significant positive effects are identified for all of the options in relation to SA objective 4.</p> <p>The options are all expected to have minor positive effects in relation to SA objectives 10: climate change mitigation and 12: air quality, for the reasons outlined in the SA. These effects are mixed with negative effects, some of which are significant.</p>
44972961	Q7 of the questionnaire	<p>"Broadly yes but the following two options should be No 1 and 2 and given significant weight. If the earth's climate continues in its erratic course then no one will be very much worried by the other options at that stage</p> <p>10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>11: To improve adaptation to climate change so as to minimise its impact"</p>	Noted.
45217569	Q7 of the questionnaire	<p>"Chapter 4 of the Interim SA Report? Explain</p> <ul style="list-style-type: none"> • Para. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough covers the area bounded by East Malling, West Malling and Kings Hill, i.e. Broadwater Farm. • Options 1 and 2 maybe essential policy options for the North-East of the Borough, but we wholeheartedly disagree that already built up areas should be further densified. • Adoption of "no special protection" Option 3 would lead to significant harm, 	<p>The Interim SA Report identifies three options to prevent merging of settlements in the north-east of the Borough: (1) Extend the outer edge of the Green Belt; (2) An anti-coalescence/strategic gap policy; (3) No change to the existing Green Belt boundary and no gap policy.</p> <p>With regard to densifying existing built up areas, it is assumed that this comment instead relates to the two options for future development of Tonbridge. The SA provides an appraisal of these different options to help the Council establish a way forwards regarding future development.</p>

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		<ul style="list-style-type: none"> • Expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan. • Expansion of buildings from East Malling through to West Malling by the building on 40 Acres and Winterfield would be in direct contravention of the stated preferred strategy not to coalesce communities." 	
45325537	Q7 of the questionnaire	<p>"The answer to this question is split into two subsections Quantum Options and Spatial Options.</p> <p>Quantum Options</p> <p>We agree with Option 2 to the extent that it identifies a scenario whereby the Council has tested an option that goes above meeting its minimum housing need (plus 10%). However, as explained above, we recommend that a further reasonable alternative option is tested whereby a greater than 10% plus assessed housing need is met. This is to ensure the Sustainability Appraisal (SA) robustly appraises a scenario whereby it accommodates unmet need from London and other neighbouring boroughs, as well as better addresses affordability issues and providing for flexibility in the Plan (particularly if the spatial strategy includes for the delivery of larger strategic sites/ new settlements, which increases the risk of needs not being met should there be a delay in the delivery of those larger sites).</p> <p>We would not endorse Option 1, as it would fail to deliver the growth required to meet the housing and affordability issues in the Borough, would not provide for greater flexibility and resilience in meeting housing needs across the Plan period and would not provide for meeting the unmet needs of London and neighbouring authorities.</p> <p>It is noted that the SA at paragraph 4.6 is concerned that Option 2 could cause minor negative effects as it could put a strain on existing services. However, it is unclear how the SA has considered the way in which the provision of more homes could actually help deliver or fund via S106 contributions the expansion or provision of new services and infrastructure. In addition, the SA should recognise how additional growth at RSCs for example could enable a critical mass of population to be achieved to allow for services such as GP surgeries to return to RSCs where they may have left previously due to it being unviable for them to remain there. In addition, the SA should recognise that even if GP surgeries are provided within settlements, residents are free to choose which GP surgery to use and as such may not choose to use their 'local' GP and may prefer to use a GP surgery in a different settlement if there is capacity.</p> <p>In addition, we note that paragraph 4.9 questions whether Option 2 would be deliverable, as it considered that "... this level of housing delivery would be in excess of what the local housing markets have</p>	<p>Quantum Option 2 (assessed need + 10%) was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on. An even higher growth scenario of assessed need + 20% would not yield particularly different SA effects to Quantum Option 2, as both options are relatively similar and so it would be difficult to distinguish between the effects each is likely to have.</p> <p>The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities. Therefore, the minor positive effect against SA objective 1: health and wellbeing for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in health and other services and facilities becoming overloaded. The same applies in relation to SA objectives 2: services and facilities and 3: education. The SA also acknowledges in paragraph 4.6 that with regard to Quantum Option 2 "...this extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>Residents cannot necessarily choose to attend a different GP surgery in a different settlement, as they must fall within the catchment area for a GP surgery.</p> <p>With regards to deliverability and historic delivery rates, providing housing that meets the assessed need would be more likely to be achieved than providing housing higher than the assessed need.</p>

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		<p>supported over the past decade, as demonstrated by the Housing Market Delivery Study. Therefore, there is uncertainty attached to this option as there is a question mark around its deliverability." However, we would be concerned with the deliverability of this Option being questioned because of historic trends, given a driving factor for historic delivery rates would have been any constraints to deliver new homes applied by the prevailing planning policy context.</p> <p>Spatial Options</p> <p>As identified above, it is therefore considered that a balanced and blended approach to Spatial Options 4 and 5 will likely be required to meet the housing needs of the Borough. These Spatial Options will best ensure that a wide range of sites, including smaller and larger plots, development adjacent to settlements, on green field and on brownfield are delivered, which will assist in providing for a consistent supply of homes across the Plan period."</p>	
45430305	Q7 of the questionnaire	<p>"● Para. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough covers the area bounded by East Malling, West Malling and Kings Hill, i.e. Broadwater Farm.</p> <ul style="list-style-type: none"> ● Options 1 and 2 maybe essential policy options for the North-East of the Borough, but we wholeheartedly disagree that already built up areas should be further densified. ● Adoption of "no special protection" Option 3 would lead to significant harm, ● Expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan. ● Expansion of buildings from East Malling through to West Malling by the building on 40 Acres and Winterfield would be in direct contravention of the stated preferred strategy not to coalesce communities." 	<p>The Interim SA Report identifies three options to prevent merging of settlements in the north-east of the Borough: (1) Extend the outer edge of the Green Belt; (2) An anti-coalescence/strategic gap policy; (3) No change to the existing Green Belt boundary and no gap policy.</p> <p>With regard to densifying existing built up areas, it is assumed that this comment instead relates to the two options for future development of Tonbridge. The SA provides an appraisal of these different options to help the Council establish a way forwards regarding future development.</p>
45509121	Q7 of the questionnaire	<p>"● Para. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough covers the area bounded by East Malling, West Malling and Kings Hill, i.e. Broadwater Farm.</p> <ul style="list-style-type: none"> ● Options 1 and 2 maybe essential policy options for the North-East of the Borough, but we wholeheartedly disagree that already built up areas should be further densified. ● Adoption of "no special protection" Option 3 would lead to significant harm, ● Expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan. ● Expansion of buildings from East Malling through to West Malling by the building on 40 Acres and Winterfield would be in direct 	<p>The Interim SA Report identifies three options to prevent merging of settlements in the north-east of the Borough: (1) Extend the outer edge of the Green Belt; (2) An anti-coalescence/strategic gap policy; (3) No change to the existing Green Belt boundary and no gap policy.</p> <p>With regard to densifying existing built up areas, it is assumed that this comment instead relates to the two options for future development of Tonbridge. The SA provides an appraisal of these different options to help the Council establish a way forwards regarding future development.</p>

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		contravention of the stated preferred strategy not to coalesce communities."	
45644993	Q7 of the questionnaire	Option 1. Based on the assessments 4.6, 4.7 and 4.8, particularly 4.8, referring to increased transport movements. Concentrating developments in and around existing urban areas minimises the impact of "increased transport movements".	Noted.
45648321	Q7 of the questionnaire	<p>"It unreasonable to over-deliver and base the Local Plan on meeting the assessed housing needs target which we already believe is out of date and excessive. Also, there is no logic to suggest that building more housing to meet supposed demand will lower the price of houses in either of the Housing Market Areas it will simply stimulate more demand and more people will relocate here rather than meeting demand from within the borough. Option 2 will inevitably increase the likelihood of land being removed from the Green Belt for development which is opposed.</p> <p>Regarding the provision of healthcare facilities, it must be recognised that it is easier to build the physical medical centres than find trained medical staff who would work in them. The evidence that we have seen in the borough already is that we struggle to cope with the numbers currently required, let alone 10% more. Trained medical staff are in great demand and West Malling Group Practice is a good example and are constantly understaffed.</p> <p>In terms of land where there are mineral deposits, where these are scarce, they should be worked before any development is considered.</p> <p>It is likely that huge damage will be caused by large-scale development on the Green Belt around Tonbridge. Arterial roads and many junctions are already operating over-capacity, so the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense. The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by deSning locations for a further 10% beyond the target set for the borough by the Government.</p> <p>The proposal that building 10% more homes will have a favourable impact on affordability for those looking to buy property is rejected. The Housing Market Delivery Study does not indicate that market demand will support Option 2. We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and we know that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options, although Option One is chosen the Sustainability Appraisal acknowledges that the council's previous policies have seen substantial development in the town centre. Although a relatively dense residential development, the area</p>	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey¹ to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council determine which option to pursue. Quantum Option 2 receives a mixed minor positive and uncertain minor negative effect in relation to SA objective 1: health and wellbeing. The minor positive effect is due to the fact it "would provide the critical mass needed to support provision of health and wellbeing related infrastructure", whilst the minor negative effect is due to the fact "delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded". The effect is recorded as uncertain, as "there is no evidence indicating a particular threshold at which development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development".</p> <p>The SA gives consideration to Minerals Safeguarding Areas and recorded all effects against SA objective 13: material assets and waste as uncertain as "any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated".</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents".</p> <p>With regard to agricultural land, all five spatial options are recorded as having a significant negative effect against this objective (SA</p>

¹ arc⁴ (2022). Housing Needs Survey 2022. (see <https://www.tmbc.gov.uk/downloads/file/2187/housing-needs-report-2022>)

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p> <p>There is insufficient importance placed on retaining agricultural land in order to encourage and facilitate food security for the UK in this report, so oppose development on Grade 1, 2 and 3 Agricultural Land.</p> <p>There are huge reservations about sites proposed in flood risk areas and although there are mitigating architectural solutions to the potential resilience of some town centre sites using SUDS, fluvial and surface water flooding will have ever-worsening impact on communities who will be living there. Modelling demonstrates that the flooding due to intense summer rain will be an increasingly frequent occurrence.</p> <p>Although Option 1 is selected out of the two options given for The future development of Tonbridge, development higher than 5 storeys is unacceptable and the architecture of any new development should be sympathetic to nearby buildings and in harmony with existing examples of good design such as those on Medway Wharf Rd, the gabled building in the High Street and Whitefriars Wharf which acknowledge the towns history. It is better to have development in the town centre where car use will be reduced because of services being close to hand and the accessibility of rail services than to develop on Green Belt land. In SW Tonbridge, Higham Wood and around Trench Wood and on Tonbridge Farm, where there are few alternatives to using cars to access services, we have a massively congested traffic system with an Air Quality Management Area at its heart. A one-way system to divert 50% of traffic away from Tonbridge High Street may mitigate the eRects of more development in the town centre.</p> <p>Development in SW Tonbridge will have a detrimental effect on the setting of the High Weald Area of Outstanding Natural Beauty as the area is overlooked by it and of course negatively impacts respect biodiversity and the open aspect and character of the landscape would be detrimentally affected.</p> <p>As the report sets out the impact of development on the Green Belt around Tonbridge will have a knock-on effect in terms of flood risk to communities downstream such as East Peckham as it will increase the number of impermeable surfaces, because the water has to go somewhere!"</p>	<p>objective 9: soil). Only Spatial Option 2 is recorded as also having a minor positive effect, as a greater focus on the larger urban areas in the Borough may encourage a higher share of previously developed land that comes forward for development. Consideration is also given to the Agricultural Land Classification in the site appraisals, whereby sites on Grade 1 or 2 agricultural land receive a significant negative effect and sites on Grade 3 agricultural land receive an uncertain significant negative effect.</p> <p>Consideration is also given to flooding in this SA, with sites in Flood Zone 3 and/or land with a 1 in 30 year risk of surface water flooding receiving significant negative effects, and sites in Flood Zone 2 and/or land with a 1 in 100 year risk of surface water flooding receiving minor negative effects.</p> <p>With regard to the future development of Tonbridge options, the SA has appraised these. Neither has yet been chosen.</p>
45648993	Q7 of the questionnaire	<p>"It unreasonable to over-deliver and base the Local Plan on meeting the assessed housing needs target which we already believe is out of date and excessive. Also, there is no logic to suggest that building more housing to meet supposed demand will lower the price of houses in either of the Housing Market Areas it will simply stimulate more demand and more people will relocate here rather than meeting demand from within the borough. Option 2 will inevitably increase the likelihood of land being removed from the Green Belt for development which is opposed.</p>	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this,</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Regarding the provision of healthcare facilities, it must be recognised that it is easier to build the physical medical centres than find trained medical staff who would work in them. The evidence that we have seen in the borough already is that we struggle to cope with the numbers currently required, let alone 10% more. Trained medical staff are in great demand and West Malling Group Practice is a good example and are constantly understaffed.</p> <p>In terms of land where there are mineral deposits, where these are scarce, they should be worked before any development is considered.</p> <p>It is likely that huge damage will be caused by large-scale development on the Green Belt around Tonbridge. Arterial roads and many junctions are already operating over-capacity, so the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense. The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by deSning locations for a further 10% beyond the target set for the borough by the Government.</p> <p>The proposal that building 10% more homes will have a favourable impact on affordability for those looking to buy property is rejected. The Housing Market Delivery Study does not indicate that market demand will support Option 2. We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and we know that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options, although Option One is chosen the Sustainability Appraisal acknowledges that the council's previous policies have seen substantial development in the town centre. Although a relatively dense residential development, the area identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p> <p>There is insufficient importance placed on retaining agricultural land in order to encourage and facilitate food security for the UK in this report, so oppose development on Grade 1, 2 and 3 Agricultural Land.</p> <p>There are huge reservations about sites proposed in flood risk areas and although there are mitigating architectural solutions to the potential resilience of some town centre sites using SUDS, fluvial and surface water flooding will have ever-worsening impact on communities who will be living there. Modelling demonstrates that the flooding due to intense summer rain will be an increasingly frequent occurrence.</p> <p>Although Option 1 is selected out of the two options given for The future development of Tonbridge, development higher than 5 storeys is unacceptable and the architecture of any new development should</p>	<p>TMBC commissioned a Housing Needs Survey² to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council determine which option to pursue. Quantum Option 2 receives a mixed minor positive and uncertain minor negative effect in relation to SA objective 1: health and wellbeing. The minor positive effect is due to the fact it "would provide the critical mass needed to support provision of health and wellbeing related infrastructure", whilst the minor negative effect is due to the fact "delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded". The effect is recorded as uncertain, as "there is no evidence indicating a particular threshold at which development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development".</p> <p>The SA gives consideration to Minerals Safeguarding Areas and recorded all effects against SA objective 13: material assets and waste as uncertain as "any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated".</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents".</p> <p>With regard to agricultural land, all five spatial options are recorded as having a significant negative effect against this objective (SA objective 9: soil). Only Spatial Option 2 is recorded as also having a minor positive effect, as a greater focus on the larger urban areas in the Borough may encourage a higher share of previously developed land that comes forward for development. Consideration is also given to the Agricultural Land Classification in the site appraisals, whereby sites on Grade 1 or 2 agricultural land receive a significant negative effect and sites on Grade 3 agricultural land receive an uncertain significant negative effect.</p> <p>Consideration is also given to flooding in this SA, with sites in Flood Zone 3 and/or land with a 1 in 30 year risk of surface water flooding receiving significant negative effects, and sites in Flood Zone 2 and/or land with a 1 in 100 year risk of surface water flooding receiving minor negative effects.</p>

² arc4 (2022). Housing Needs Survey 2022. (see <https://www.tmbc.gov.uk/downloads/file/2187/housing-needs-report-2022>)

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		<p>be sympathetic to nearby buildings and in harmony with existing examples of good design such as those on Medway Wharf Rd, the gabled building in the High Street and Whitefriars Wharf which acknowledge the towns history. It is better to have development in the town centre where car use will be reduced because of services being close to hand and the accessibility of rail services than to develop on Green Belt land. In SW Tonbridge, Higham Wood and around Trench Wood and on Tonbridge Farm, where there are few alternatives to using cars to access services, we have a massively congested traffic system with an Air Quality Management Area at its heart. A one-way system to divert 50% of traffic away from Tonbridge High Street may mitigate the eRects of more development in the town centre.</p> <p>Development in SW Tonbridge will have a detrimental effect on the setting of the High Weald Area of Outstanding Natural Beauty as the area is overlooked by it and of course negatively impacts respect biodiversity and the open aspect and character of the landscape would be detrimentally affected.</p> <p>As the report sets out the impact of development on the Green Belt around Tonbridge will have a knock-on effect in terms of flood risk to communities downstream such as East Peckham as it will increase the number of impermeable surfaces, because the water has to go somewhere!"</p>	With regard to the future development of Tonbridge options, the SA has appraised these. Neither has yet been chosen.
42168897	Q7 of the questionnaire	<p>"● Para. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough covers the area bounded by East Malling, West Malling and Kings Hill, i.e. Broadwater Farm.</p> <ul style="list-style-type: none"> ● Options 1 and 2 maybe essential policy options for the North-East of the Borough, but we wholeheartedly disagree that already built up areas should be further densified. ● Adoption of "no special protection" Option 3 would lead to significant harm, ● Expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan. ● Expansion of buildings from East Malling through to West Malling by the building on 40 Acres and Winterfield would be in direct contravention of the stated preferred strategy not to coalesce communities" 	<p>The Interim SA Report identifies three options to prevent merging of settlements in the north-east of the Borough: (1) Extend the outer edge of the Green Belt; (2) An anti-coalescence/strategic gap policy; (3) No change to the existing Green Belt boundary and no gap policy.</p> <p>With regard to densifying existing built up areas, it is assumed that this comment instead relates to the two options for future development of Tonbridge. The SA provides an appraisal of these different options to help the Council establish a way forwards regarding future development.</p>
45657281	Q7 of the questionnaire	Option 1. Based on the assessments 4.6, 4.7 and 4.8, particularly 4.8, referring to increased transport movements. Concentrating developments in and around existing urban areas minimises the impact of "increased transport movements".	Noted.
45712961	Q7 of the questionnaire	Assessment assumes that defined Urban Areas have the services and infrastructure to support further expansion. West Malling and Kings Hill transport infrastructure, parking, medical facilities and schools are unable to support the existing number of residents and dwellings.	Noted.

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42609601	Q7 of the questionnaire	<p>"The answer to this question is split into two subsections Quantum Options and Spatial Options.</p> <p>Quantum Options</p> <p>It is noted that the Sustainability Appraisal at paragraph 4.6 is concerned that Option 2 could cause minor negative effects as it could put a strain on existing services. However, it is unclear how the SA has considered the way in which the provision of more homes could actually help deliver or fund via S106 contributions the expansion or provision of new services and infrastructure. In addition, the SA should recognise how additional growth at RSCs for example could enable a critical mass of population to be achieved to allow for services such as GP's to return to RSCs where they may have left previously due to it being unviable for them to remain there.</p> <p>In addition, we note that paragraph 4.9 questions whether Option 2 would be deliverable, as it considered that "... this level of housing delivery would be in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study. Therefore, there is uncertainty attached to this option as there is a question mark around its deliverability." However, we would be concerned with the deliverability of this Option being questioned because of historic trends, given a driving factor for historic delivery rates would have been any constraints to deliver new homes applied by the prevailing planning policy context.</p> <p>Spatial Options</p> <p>As identified above, it is therefore considered that a balanced and blended approach to Spatial Options 4 and 5 will likely be required to meet the housing needs of the Borough. These Spatial Options will best ensure that a wide range of sites, including smaller and larger plots, development adjacent settlements, on green field and on brownfield are delivered, which will assist in providing for a consistent supply of homes across the Plan period."</p>	<p>The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities. Therefore, the minor positive effect against SA objective 1: health and wellbeing for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in health and other services and facilities becoming overloaded. The same applies in relation to SA objectives 2: services and facilities and 3: education. The SA also acknowledges in paragraph 4.6 that with regard to Quantum Option 2 "...this extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>Residents cannot necessarily choose to attend a different GP surgery in a different settlement, as they must fall within the catchment area for a GP surgery.</p> <p>With regards to deliverability and historic delivery rates, providing housing that meets the assessed need would be more likely to be achieved than providing housing higher than the assessed need.</p>
43485921	Q7 of the questionnaire	<p>"P. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough is of great significance to BAG as it covers the area bounded by East Malling, West Malling and Kings Hill, i.e.: Broadwater Farm. Although BAG strongly believes that Options 1 and 2 are essential policy options for the North-East of the Borough, and any adoption of ""no special protection"" Option 3 would lead to significant harm, BAG does not agree with all the findings of the strategic policy option assessments.</p> <p>The statement regarding the land being Grade 2 is misleading as the soil analysis carried out on land in the Medway gap by KCC clearly shows it as Grade 1 and Grade 2. Any reference to adverse and minor</p>	<p>The SA states that a high proportion of land between Kings Hill, West Malling and East Malling is Grade 2 agricultural land. Due to the high-level nature of the options to prevent merging of settlements, it is difficult for the SA to be more specific than this. The SA does not say that there is no Grade 1 agricultural land here, just that most of it is Grade 2. Options 1 and 2 receive minor positive effects on SA objective 9: soils, as they would prevent development on the agricultural land. The significance of all effects has been applied correctly.</p>

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		<p>negative effects of adopting Options 1 or 2 should be disregarded as building on this farmland and open countryside would be irreversible with blatant destruction of these assets.</p> <p>BAG believes some of the positives associated with Option 1 and Option 2 have been underrepresented. For example SA Objection 9 ""To conserve and enhance soil resources and guard against land contamination"" should be strong positives for obvious reasons. Additionally, Option 3 understates its negative effects e.g. SA Objective 8 ""To protect and enhance the quality of water features and resources"" should be a strong negative, not a ""O"" due to an inevitable impact on the area's abundant and now well documented hydro-geological features.</p> <p>Any expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan."</p>	
45742881	Q7 of the questionnaire	<p>"Quantum Options</p> <p>In terms of the quantum of overall housing, we do not agree with the scope of the options presented and assessed within the Interim SA. A particular concern (as detailed in our response to Question 6), is that the SA only considers options to either met the minimum Standard Method housing need figure, or to exceed that figure by 10%.</p> <p>The Interim SA provides a clear, and agreed, justification for not exploring options to promote development below the 839dpa Standard Method figure, noting references to worsening levels of housing affordability and national planning policies. The document also explains (at paragraph 4.4) that a figure of up to 10% above the evidence-based need is to be tested, '...to see what is realistically achievable in the context of the local housing markets and being mindful of the need for flexibility to be able to adapt to rapid change.'</p> <p>However, the selection of only a 10% increase appears arbitrary and we consider this scenario should have been considered alongside options for further uplifts (i.e. over and above a 10% increase). Indeed, noting that a 20% buffer is currently applied for the purposes of calculating the 5YHLS position, it is not clear why an option for a 20% increase was not tested. It would also be appropriate to test the effects of an increased housing requirement to support Duty-to-Cooperate discussions with neighbouring Local Authorities.</p> <p>With respect to Table 4.1, we are unconvinced by the suggestion that an increase of 10% (i.e. 1,594 dwellings) would result in significantly</p>	<p>The quantum options subject to SA were identified by TMBC. It is reasonable, as a starting point, for one quantum option to be the assessed need generated by the Government's standard method. Quantum Option 2 is the assessed need + up to 10% therefore providing a buffer.</p> <p>Quantum Option 2 was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on. An even higher growth scenario of assessed need + 20% would not yield particularly different SA effects to Quantum Option 2, as both options are relatively similar and so it would be difficult to distinguish between the effects each is likely to have. +10% was considered a proportionate uplift for consideration.</p> <p>The SA acknowledges that an increase of 10% has more potential to cause capacity issues with existing services and facilities. However, it also acknowledges that with regard to an increase of 10%, the Borough "has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>With regard to climate change, Quantum Option 2 receives a significant negative effect (as part of a mixed effect) because a higher level of housing growth is likely to result in increased transport movements, as there will be more people with private cars and a subsequent increase in CO₂ emissions. This will contribute to climate change, as well as poor air quality – particularly as there are seven Air Quality Management Areas (AQMA's) within the Borough.</p> <p>The reasoning behind the effects each Quantum Option is expected to have is outlined in paragraphs 4.6 to 4.10 of the full Interim SA Report. Quantum Option 2 receives minor negative effects (as part of a mixed minor effect) against SA objectives 1: health and wellbeing, 2: services and facilities, and 3: education because as explained in the</p>

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		<p>greater effects or impacts, when compared to the baseline Standard Method figure of 15,941. The assumption made in respect of SA Objectives 1, 2, and 3 appears to be that additional growth (above the baseline) will place increased pressure on services and infrastructure.</p> <p>However, the reasoning set out in the Interim SA (at paragraphs 4.6 to 4.10) appears to ignore the potential for increased housing delivery to facilitate additional infrastructure, in the form of new health centres, community facilities and schools, etc. We suggest that Option 2 (+10% housing growth), should be scored more positively than Option 1 in respect of SA objectives 1 to 3.</p> <p>Similarly, it is counter-intuitive to assume that an option for a higher level of housing growth would result in worse climate change and air quality outcomes. Ultimately, the impacts of increased levels of growth will depend on the subsequent strategy for distribution. For example, it is an intuitive proposition that a higher housing requirement is likely to result in additional allocations for larger-scale developments. Such larger-scale developments tend to provide greater potential to enhance public transport, improve pedestrian and cycle connectivity, etc. This would seem to reduce the potential consequence to climate change and air quality impacts. Indeed, there are latent opportunities to maximise the benefits from existing transport nodes within the Plan-area."</p>	<p>report, delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities, services and facilities, and schools. However, the Interim SA Report also acknowledges that the extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities.</p> <p>Spatial Option 5 is likely to have a significant negative effect (as part of a mixed effect) against SA objective 10: climate change mitigation because it will direct some growth towards rural settlements where there is lower service and facility provision, which is likely to increase private car travel.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p>
45934529	Q7 of the questionnaire	Assessment assumes that defined Urban Areas have the services and infrastructure to support further expansion. West Mallong and Kings Hill transport infrastructure, parking, medical facilities and schools are unable to support the existing number of residents and dwellings.	Noted.
46010689	Q7 of the questionnaire	Option 1. Based on the assessments 4.6, 4.7 and 4.8, particularly 4.8, referring to increased transport movements. Concentrating developments in and around existing urban areas minimises the impact of "increased transport movements".	Noted.
46102273	Q7 of the questionnaire	<p>"P. 4.38 Options to Prevent Merging of Settlements in the North-East of the Borough is of great significance to BAG as it covers the area bounded by East Mallong, West Mallong and Kings Hill, i.e.: Broadwater Farm. Although BAG strongly believes that Options 1 and 2 are essential policy options for the North-East of the Borough, and any adoption of "no special protection" Option 3 would lead to significant harm, BAG does not agree with all the findings of the strategic policy option assessments.</p> <p>The statement regarding the land being Grade 2 is misleading as the soil analysis carried out on land in the Medway gap by KCC clearly shows it as Grade 1 and Grade 2. Any reference to adverse and minor negative effects of adopting Options 1 or 2 should be disregarded as building on this farmland and open countryside would be irreversible with blatant destruction of these assets.</p>	The SA states that a high proportion of land between Kings Hill, West Mallong and East Mallong is Grade 2 agricultural land. Due to the high-level nature of the options to prevent merging of settlements, it is difficult for the SA to be more specific than this. The SA does not say that there is no Grade 1 agricultural land here, just that most of it is Grade 2. Options 1 and 2 receive minor positive effects on SA objective 9: soils, as they would prevent development on the agricultural land. The significance of all effects has been applied correctly.

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		<p>BAG believes some of the positives associated with Option 1 and Option 2 have been underrepresented. For example SA Objection 9 "To conserve and enhance soil resources and guard against land contamination" should be strong positives for obvious reasons. Additionally, Option 3 understates its negative effects e.g. SA Objective 8 "To protect and enhance the quality of water features and resources" should be a strong negative, not a "0" due to an inevitable impact on the area's abundant and now well documented hydro-geological features.</p> <p>Any expansion North of Kings Hill would contribute to the coalescence of communities. In direct contravention of the stated preferred strategy of the Local Plan."</p>	
46163713	Q7 of the questionnaire	<p>"Answer: Broadly yes but the following two options should be No 1 and 2 and given significant weight. If the earth's climate continues in its erratic course then no one will be very much worried by the other options at that stage</p> <p>10: To reduce greenhouse gas emissions so as to minimise climate change</p> <p>11: To improve adaptation to climate change so as to minimise its impact"</p>	Noted.
38377665	Q7	I agree with all the broad principles and aspirations but am not sure about the conclusions. Not clear how these are arrived at and there are too many question marks.	Due to the high-level nature of SA, uncertainty has been added to some of the effects.
42330433	Q7	The report is of poor quality. It is full of unexplained acronyms. It has meaningless assessments e.g. "-/+?" and it lacks evidence or explanations for its assessments (by comparison to the urban capacity study which at least offers some rigour to its findings).	<p>The SA Report was accompanied by a Non-Technical Summary. The SA Report itself is necessarily technical in nature given the range and quantity of data that needs to be gathered and analysed.</p> <p>All letters in abbreviated form have been fully named in the report. Chapter 2 explains how the assessment has been undertaken and Table 2.1 provides a key to the symbols and colour coding used throughout the report. The assessment criteria against which the sites have been appraised are provided in Appendix D.</p>
25315361	Q7	It is isn't sufficient for a site to be within 400m of a bus stop, there should be at least one bus a day every weekday, even in school holidays.	SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.
39011745	Q7	Chapter 4 appears to try to compare options with no specific conclusions. However, there are concerns that the descriptions are not balanced.	The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.

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		<p>With regards to Kings Hill, CP11 deprecates any development outside of the town itself, CP12 similarly constrains development around West Malling and CP13 should be taken into account.</p> <p>There are excessive active travel issues; Kings Hill is not effectively connected to the cycle and public footpath network, and joint use of pavements for pedestrians and cyclists where the pavements do not meet the guidelines for such use, impacts take-up of active travel, and discourages walking and access for disabled people.</p> <p>I would like to highlight that the KCC plan for cycle connectivity for the previous decade has not been implemented; this would have resulted in significant improvements. In addition I considers that the developer obligation to link onto the public footpath network has not been effectively addressed. These issues are resulting in rapidly deteriorating infrastructure for active travel which needs to be addressed as a matter of urgency.</p>	<p>The SA is too high-level to give consideration to specific road networks and congestion. However, in the site-specific appraisals, consideration is given to the proximity of sites to existing walking and cycling paths. It will be the role of the Local Plan to help address the active travel issues mentioned by the respondent.</p>
42585633	Q7	<p>Chapter 4 appears to try to compare options with no specific conclusion. However the descriptions are not balanced.</p> <p>With regards to Kings Hill CP11 avoids any development outside the town itself, CP12 similarly limits development around West Malling and CP13 should be taken into account.</p> <p>There are significant travel issues , Kings Hill is not connected to the cycle /public footpath network, joint use of pavements for pedestrians and cyclists where pavements do not meet the required guidelines deters the take up of active travel and discourages walking and access for disabled people. The result is rapidly deteriorating infrastructure for active travel</p>	<p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p> <p>The SA is too high-level to give consideration to specific road networks and congestion. However, in the site-specific appraisals, consideration is given to the proximity of sites to existing walking and cycling paths. It will be the role of the Local Plan to help address the active travel issues mentioned by the respondent.</p>
42527265	Q7	<p>I feel the appraisals of sites shows a fundamental lack of knowledge of the East side of the borough and many of the objective make inaccurate assumptions. There has already been at least a doubling of dwellings with little or no infrastructure provision. A bus stop does not mean there is a bus service, a school does not mean residents children will have access to it if it is already full. If the medical facility is already unable to cope with the current resident, how can additional dwellings even be considered?</p> <p>The lack of public transport requires most households to have at least 2 cars, increasing emissions and additional strain on an already saturated rural road network. Any development in the 'other rural' hierarchy should stipulate any 2/3 bed dwellings have at least 2 parking spaces. Any Travel Plans require full scrutiny. It is pointless stating that there will be increased cycle travel if there are no cycle lanes and the road are too dangerous to use as well as not having any linking infrastructure.</p>	<p>The site appraisals have been informed by numerous data sources including from the Borough Council, County Council, Natural England, the Environment Agency and Historic England.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to education, the site assessment criteria acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p>
42683265	Q7	<p>This is very hard to follow and not set out in a manner conducive to informed and widespread public comment. Even the colour assessment is not clear as the hues do not follow a logical gradation to reflect positive and negative outcomes. The limited options appraised are already flawed by the incorrect hierarchy of settlements which fails to reflect the connectivity and sustainability of each location, only the historic size of settlements. Most of the sustainability criteria, water, land, historic environment, air quality, climate and human health as well as economy will be harmed if the housing needs are met by locating new housing distant from the main transport hubs, motorway, A21 and railways, unless major new infrastructure is inserted, which is currently not affordable.</p> <p>The determining factor for the siting and provision of new dwellings must be proximity to the existing transport network and the hierarchy for development locations should reflect this.</p> <ol style="list-style-type: none"> 1. Intensification of development in established urban areas with railway stations, specifically Medway gap, Snodland and Tonbridge. Comprehensive new development in the centre along the High Street, rethinking the retail environment and on Railtrack land round the station. A eastern bypass/ ring road link is required to reduce through traffic. 2. New development around all the rural railway hubs, in particular at West Malling and Hildenborough Stations and Borough Green. There will be some loss of green space, but this harm is outweighed by meeting the housing need in locations with pedestrian access to the rail network or direct access to the motorway network. 3. Development in isolated rural settlements, distant from these transport hubs, should be limited, regardless of whether they are larger, Hadlow, East Peckham, or smaller villages, as non of these settlements has sufficient services to be self sustaining and all will just put more cars on the borough's roads with more bottlenecks and pollution. Extended development of these rural settlements will 	<p>The SA Report was accompanied by a Non-Technical Summary. The SA Report itself is necessarily technical in nature given the range and quantity of data that needs to be gathered and analysed.</p> <p>The PDF version of the Non-Technical Summary available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template abides by WCAG 2.1 regulations to the highest standard (level AAA). The report is therefore accessible to those whose are colour blind.</p> <p>Chapter 4 of the Interim SA Report provides an appraisal of quantum options, spatial options, the future development of Tonbridge options and options to prevent merging of settlements in the north east of the Borough. The spatial options look at different options for the distribution of development within the Borough, with the options covering larger urban areas scoring more positively than others.</p> <p>Spatial Option 1 covers sites within and adjacent to settlements beyond the outer Green Belt boundary and Areas of Outstanding Natural Beauty, Spatial Option 2 covers sites within and adjacent to defined urban settlements, Spatial Option 3 covers sites within and adjacent to defined urban and rural service centre settlements, Spatial Option 4 supports distributed development across the Borough, which will include more rural areas, and Spatial Option 5 considers a new settlement. The defined urban settlements have good access to public transport links compared to more rural areas, and this is reflected in the appraisal of these options – particularly in relation to SA objective 10: climate change mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		further degrade the rural environment, reduce the agricultural & ecological potential of the borough and increase suburbanisation, with no compensating benefits.	
38333377	Q7	This is such an unweildy consultation that the there should of been a completely separete process to develop the sustainability objectives and the findings in the appraisal report.	The Scoping stage of the SA was completed in November 2021. This included the SA framework, which comprises the SA objectives. Consultation was undertaken with the three statutory consultees as required (the Environment Agency, Natural England and Historic England) and LUC updated the SA framework to reflect their comments. LUC also made some amendments to the framework to ensure it was consistent with best practice.
42719137	Q7	<p>I have looked at each of the 4 summary of SA findings tables in the interim sustainability report covering:</p> <ul style="list-style-type: none"> - Quantum Options - Spatial Options - The future development of Tonbridge Options - Options to prevent the merging of the settlements in the North East of the Borough <p>Unfortunately I find that I agree with some of the findings whilst disagreeing with others therefore, I would have to go through each of the 4 assessments line by line indicating whether I agree or not and why. There are not enough characters in this space to do that. I think this is an unfair question as it cannot be answered here and would be very time consuming to answer properly. Therefore, the reason I have answered 'NO' is because I cannot agree with all the findings.</p>	Noted.
42641505	Q7	<p>Quantum options: Option 1</p> <p>THERE IS ZERO CONSIDERATION IN THE LOCAL PLAN FOR EXPLICIT RETENTION OF AGRICULTURAL LAND TO ENCOURAGE DOMESTIC FOOD SECURITY AND LOW CARBON FOOTPRINT PRODUCTION.</p> <p>It is unreasonable to overdeliver based on predictions using data that can be considered out of date and inaccurate.</p> <p>There is no logic to suggest that building additional houses decreases prices to improve affordability (see major developments such as Kings Hill) as this would be of disbenefit to the house builders to sell below market value.</p> <p>Regarding the provision of healthcare facilities, it must be recognised that it is easier to build the physical medical centres than find trained medical staff who would work in them. The evidence that we have seen in the borough already is that we struggle to cope with the numbers currently required, let alone 10% more. Trained medical staff are in great demand and West Malling Group Practice is constantly understaffed.</p> <p>Arterial roads and many junctions are already operating over-capacity, so the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense.</p>	<p>It is not the purpose of SA to prevent development on best and most versatile agricultural land, rather it is the purpose of the Local Plan to set out policy constraints. The SA uses the Agricultural Land Classification (not Placemaker) to inform SA objective 9: soils. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land receive a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land receive a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the Borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p> <p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Some Routes such as the A245 operate as alternative routes for the A21 upon the regular closures and this over capacity usage needs to be considered.</p> <p>The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by defining locations for a further 10% beyond the target set for the borough by the Government.</p> <p>The proposal that building 10% more homes will have a favourable impact on affordability for those looking to buy property is rejected. The Housing Market Delivery Study does not indicate that market demand will support Option 2.</p> <p>We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and evidence supports that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options, although Option One is chosen the Sustainability Appraisal acknowledges that the council's previous policies have seen substantial development in the town centre. Although a relatively dense residential development, the area identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p> <p>There are huge reservations about sites proposed in flood risk areas and although there are mitigating architectural solutions to the potential resilience of some town centre sites using SUDS, fluvial and surface water flooding will have ever-worsening impact on communities who will be living there.</p> <p>Modelling demonstrates that the flash flooding due to intense summer rain will be an increasingly frequent occurrence.</p> <p>1 - Developments do not necessarily improve human health or well being.(should be +/-)</p> <p>2 - Access to facilities and services depends on availability, where (eg GP) are at capacity and no new provision is given as the GP is within 800m of a development the service will likely be unavailable. Also links between a development (walking, cycle, car depend on additional facilities that may or may not be provided or fit for purpose. (should be +/-)</p> <p>3- Building houses does not improve educational attainment. (should be +/-)</p> <p>5, 6,7,9 are not question marks. building houses will definitely be negatives due to loss of greenspace, habitat, change to identity, soil contamination or removal from the building process. (should be --)</p> <p>10 - Any new houses and roads will require huge quantities of building materials including concrete that generate greenhouse gases and pollution. (should be --)</p>	<p>informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey to provide up-to-date evidence on housing need.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>The SA is too high-level to consider traffic levels, and the Council will commission additional evidence on matters including traffic.</p> <p>The SA does give consideration to the Air Quality Management Areas (AQMA's) present within the Borough, under SA objective 12: air quality. If a site is within 100m of an AQMA, it receives a significant negative effect. This is due to the fact development could increase levels of air pollution as a result of increased vehicle traffic.</p> <p>No spatial strategy options have been chosen. Instead, the SA provides an appraisal of each spatial strategy option.</p> <p>The SA also gives consideration to flood risk, under SA objective 8: water. If a site is within Flood Zone 3, at a 1 in 30 year risk of surface water flooding and contains waterbodies or watercourses, it receives a significant negative effect.</p> <p>The reasoning behind the effects given for Quantum Option 1 are provided on pages 79-85 of the Interim SA Report. Due to the high-level nature of the strategic policy options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>The SA does not state that building houses improves educational attainment. Instead, it states "New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage".</p> <p>The quantum options have been appraised on the basis that they would have a wide range of effects across the SA objectives. However, it is recognised that there is considerable uncertainty depending on the eventual location of housing development. As such, a number of the effects are recorded as uncertain.</p> <p>SA objective 14 covers housing delivery. As set out in the site assessment criteria "All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing,</p>

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		<p>11 - Any building will lead to climate change impact, even the use of heat pumps and solar panels needs raw materials that are either strip mined or are petrochemical products. (should be --)</p> <p>12 - New houses will reduce air quality by removing green space that is a carbon and pollution sink as well as introduce more traffic during building and for new residents.(should be --)</p> <p>14 - There is no guarantee the developers will provide this. Original planning applications are regularly deviated from to avoid providing public services and more smaller houses. There is no suggestion of provision for social housing in this plan where those in need who will never be able to afford to buy can be homed. There is no mention of limits to house sizes, properties over 4 bed should be exempt from this plan as they should be provided on an individual basis not as part of government housing "need" assessments.</p> <p>Consideration needs to be made for population transfer that large new developments by national housebuilders who advertise beyond the borough boundaries and encourage incoming populations.</p> <p>A large proportion of the houses developed within its borough are not 'affordable housing or social' and are promoted and sold by it's developers to outside interest. Since the covid pandemic of 2020, there has been a significant increase of population transfer from outside the borough (mainly London). With the current London transport links, TMBC borough is highly sought after area, which increases house prices, competition and reduction of available housing to the existing residents.</p>	<p>including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings" [emphasis added].</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>
42773473	Q7	<p>There is insufficient evidence based research to back up the Interim sustainability report, where are they? I would expect to see:- 1 - Independant Climate change evidence 2 - Comprehensive independent Green belt study detailing best & worst performing Green belt areas based on bio diversity criteria 3 - Strategic planning models linked to proposals that reduce Carbon footprints so you can select the most environmentally sustainable for the future.</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the Borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is a section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Information on biodiversity is also provided in the baseline information section of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42773057	Q7	I don't agree that building 10% more homes will have an impact on affordability and if anything will just encourage people from out of the area to move here rather than encourage existing residents - and the next generation - to stay.	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council determine which option to pursue.</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents". The provision of affordable housing is likely to encourage people to stay in the area, as well as encourage people to move to the area. As mentioned in the baseline information section of the Interim SA Report, the 2020 housing affordability ratio indicates that Tonbridge and Malling Borough (11.79) is less affordable than the surrounding areas of Medway (7.57), Gravesham (8.4), and Maidstone (10).</p>
42756225	Q7	I find too many question marks shown in the table to make this meaningful. The tables colour coding seems to lack a key so is therefore meaningless.	<p>Table 2.1 in Chapter 2 of the Interim SA Report provides a key to the symbols and colour coding used throughout the SA.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p>
42799361	Q7	<p>I do not consider it reasonable to over-deliver and base the Local Plan on meeting the assess housing needs target which I believe is out of date and excessive. I also believe that there is no logic to suggest that building more housing to meet supposed demand will lower the price of houses in either of the Housing Market Areas, it will simply stimulate more demand and more people will relocate here rather than meeting demand from within the borough I reject Option 2 as it will inevitably increase the likelihood of land being removed within the borough. I reject Option 2 as it will inevitably increase the likelihood of land been removed from the Green Belt for development which I oppose.</p> <p>Regarding the provision of healthcare facilities, it has to be recognised that it is easier to build the physical medical centres that actually find trained medical staff who would work in them. I believe that using the evidence that I have seen in the borough already that we would</p>	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council determine which option to pursue. Quantum Option 2 receives a mixed minor positive and uncertain minor negative effect in relation</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>struggle to cope with the numbers currently required let alone 10% more. Trained medical staff are in great demand and West Malling Group Practice are a good example and are constantly understaffed.</p> <p>In terms of land where there are mineral deposits, I believe that where these are scarce, they should be worked before any development is considered.</p> <p>It has been identified the huge damage that largescale development on the Green Belt around Tonbridge will have on our arterial roads and many junctions which are already operating over capacity the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense. The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by defining locations for a further 10% beyond the target set for the borough by the Government.</p> <p>I absolutely reject the idea that building 10% more homes will have a favourable impact on affordability for those looking to buy property. The Housing Market Delivery Study does not indicate that market demand will support Option 2. We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and we know that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options I have chosen Option 1 although as the Sustainability Appraisal acknowledges that the councils previous policies have seen substantial development in the town centre, I accept that more relatively dense residential development in the area identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p> <p>I do not believe that sufficient importance has been place on retaining agricultural land in order to encourage and facilitate food security for the UK in this report and I oppose development on Grade 1, 2, and 3 Agricultural Land.</p> <p>I have huge reservations about sites proposed in flood risk areas and although I accept there are mitigating architectural solutions to the potential resilience of some town centre sites used SUDS, we have to be mindful that fluvial and surface water flooding will be worsening influences on the communities who will be living here and modelling demonstrates that the flash flooding due to intense summer rain will be an increasingly frequent occurrence.</p> <p>The future development of Tonbridge sets out two options and I support Option 1. However, I do not support development higher than 5 storeys and I would expect the architecture of any new development to be sympathetic to nearby buildings and to be in harmony with existing examples of good design at Medway Wharf Rd the gabled building in the High Street and Whitefriars Wharf which acknowledge the towns history. It is better to have development in the town centre</p>	<p>to SA objective 1: health and wellbeing. The minor positive effect is due to the fact it "would provide the critical mass needed to support provision of health and wellbeing related infrastructure", whilst the minor negative effect is due to the fact "delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded". The effect is recorded as uncertain, as "there is no evidence indicating a particular threshold at which development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development".</p> <p>The SA gives consideration to Minerals Safeguarding Areas and recorded all effects against SA objective 13: material assets and waste as uncertain as "any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated".</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents".</p> <p>With regard to agricultural land, all five spatial options are recorded as having a significant negative effect against this objective (SA objective 9: soil). Only Spatial Option 2 is recorded as also having a minor positive effect, as a greater focus on the larger urban areas in the Borough may encourage a higher share of previously developed land that comes forward for development. Consideration is also given to the Agricultural Land Classification in the site appraisals, whereby sites on Grade 1 or 2 agricultural land receive a significant negative effect and sites on Grade 3 agricultural land receive an uncertain significant negative effect.</p> <p>Consideration is also given to flooding in this SA, with sites in Flood Zone 3 and/or land with a 1 in 30 year risk of surface water flooding receiving significant negative effects, and sites in Flood Zone 2 and/or land with a 1 in 100 year risk of surface water flooding receiving minor negative effects.</p> <p>With regard to the future development of Tonbridge options, the SA has appraised these. Neither has yet been chosen.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>where car use will be reduced as a consequence of services being close to hand and the accessibility of rail services than to develop on Green Belt land in SW Tonbridge, Higham Wood and around Trench Wood and on Tonbridge Farm where there are few alternatives to using cars to access services through a massively congested traffic system with an Air Quality Management Area at its heart. We will require a one way system to divert 50% of traffic away from Tonbridge High Street to mitigate the effects of more development in the town centre.</p> <p>Development in SW Tonbridge will have a detrimental effect on the setting of the High Weald Area of Outstanding Natural Beauty as the area is overlooked by it and of course the impacts in respect of biodiversity and the open aspect and character of the landscape would be detrimentally affected.</p> <p>As the report sets out the impact of development on the Green Belt around Tonbridge will have a knock on effect in terms of flood risk to communities downstream such as East Peckham as it will increase the number of impermeable surfaces, the water has to go somewhere!</p>	
42815521	Q7	<p>THIS QUESTION IS WORDED AMBIGUOUSLY / POORLY. You appear to be including both Quantum and Spatial Options in the same consultation question and this will confuse many respondents.</p> <p>Since assessed housing need includes inflow from other HMAs it is hard to see how even Quantum Option A could be said to have any positive health impacts FOR THE RESIDENTS OF THIS BOROUGH. As it is there is significant pressure on both health and education services and the suggestion that by increasing demand the services will magically improve is not borne out by historical experience.</p> <p>It is also highly questionable whether relaxation of planning rules as required in Spatial Options 2 and 3 will encourage economic growth or business development.</p>	<p>Quantum Options 1 and 2 both receive minor positive effects in relation to SA objectives 1: health and wellbeing and 3: education, as both support growth in the Borough, which has the potential to support the delivery of new healthcare and education facilities. It is expected that both quantum options would provide the critical mass needed to support provision of health and education facilities. The minor positive effect Option 2 is expected to have is coupled with a minor negative effect, as delivering growth beyond assessed needs has more potential to cause capacity issues at existing health and education facilities if they become overloaded.</p> <p>All five Spatial Options receive significant positive effects in relation to SA objective 4: economic growth, as they will each deliver employment land within the Borough, which will provide a range of employment opportunities for residents. Spatial Options 1, 4 and 5 also receive minor negative effects in relation to this objective, as they may be too constrained in their focus on growth in certain areas of the Borough, including smaller rural settlements that are poorly connected to the main employment locations.</p>
42832833	Q7	<p>Option 2 provides the scenario that will deliver the required Objectively Assessed Housing Need ('OAHN') (839 dpa) +10%. Whilst the additional mass could put local services/infrastructure under pressure, this could be mitigated through financial contributions from the developers and a robust and clear infrastructure delivery strategy that supports this level of growth. As set out in the response to Question 6, the OAHN should be a minimum and through the emerging Local Plan, there is an opportunity to ensure local services/infrastructure are enhanced and deliver what is required to support growth in a sustainable manner – this includes the enhancement to local services/infrastructure.</p>	<p>Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Quantum Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>With regard to SA objectives 10: climate change mitigation and 12: air quality, providing more housing as proposed under Quantum Option 2 is likely to increase the number of cars on the road and associated emissions. As Option 2 proposes more development than Option 1, it is expected to have more significant effects than Option 1.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		In respect of Objective 10 (to reduce greenhouse gas emissions) and 12 (to improve air quality) – whilst providing over and above the OAHN, as set out in the Sustainability Appraisal, development is “likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents”.	
42832705	Q7	<p>For any development to meet its sustainability objectives it needs to recognise the environment in which it is being proposed: \to acheive SA 2. it needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use (SA10); additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat (SA 5 and SA 6) through disruption of wildlife habitats and interruption of "darksies" environments; the scale of the developments will materially impact what has been described in the "East Malling Conservation Study" as an areas of "Unspoilt beauty" and would disturb the distinct, historic characters of East Malling and West Malling villages</p> <p>Regarding SA 11 and 12: Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity)</p> <p>Regarding SA 14: Of the proposed developments only a very small proportion are affordable to young buyers in the local demographic</p>	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, give consideration to the landscape and what effects development will have on the landscape, under SA objective 6: landscape and townscape.</p> <p>Biodiversity is addressed under SA objective 5: biodiversity and geodiversity. Information on how sites have been appraised against this objective is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p>
42437729	Q7	<p>The Interim Sustainability Appraisal Report is only considering the current position and constraints. For example, when assessing the spatial options, particularly for Option 5, it does not consider what this option would look like if services were improved - i.e. new healthcare facilities, new schools, new transport links.</p> <p>Why not? If you continue to appraise against the same restrited criteria you will get the same answer - we know the answer isn't right otherwise the previous plan would not have been withdrawn. It very much feels like this plan is being drafted to direct towards predetermined answers rather than looking at the plan with a blank sheet of paper.</p>	<p>The purpose of the SA is to appraise all options throughout the plan-making process, against the current baseline (Appendix C of the Interim SA Report). The baseline information provides the basis against which to assess the plan, as set out in Planning Practice Guidance 016-20190722.</p>
42466209	Q7	<p>I do agree with some parts, the air quality pressures for example, how new builds could overwhelm the current facilities, services and schools. However I don't believe that building more homes automatically means they become affordable. Most current houses here are outside of the many peoples price range and all new homes that have been built so far are priced far higher than the national average, I can't imagine the building companies will price them lower</p>	<p>The baseline information section of the Interim SA Report (Appendix C) acknowledges the fact Tonbridge and Malling Borough is less affordable than the surrounding areas of Medway, Gravesham, and Maidstone. As mentioned in the SA, a higher level of housing supply has more potential to address housing affordability.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		that what they could achieve for them. That makes no business sense and that's what they are at the end of the day, a business.	
42720705	Q7	<p>I challenge the sustainability appraisal for at least the following ref nos:59750,59749,59599,59597,59752,59816,59598,59759,59760,59755 ,59758,59754,59757, and 59761. All these are in the surrounds of Mereworth village.</p> <ol style="list-style-type: none"> 1. The village is surrounded by the A228 and B2016. Both these roads are heavily trafficked and narrow. Already dangerous for cyclists which, together with broken down or stopped vehicles can cause bad tailbacks. Increased local traffic could cause complete gridlock. 2. The main street through the village, a bus route, already is often almost gridlocked at school exiting times and is often congested with parked cars at other times. Children are required to be collected from school and as most of the children live beyond walking distance collection is necessary. Further homes exiting on to this road would decrease the available parking and increase congestion. 3. Most of the roads in Mereworth, between the A228 and B2016 are single track roads with no pedestrian pathways. These have no allowance for increased traffic. Their exits on to the A228 and B2016 are dangerous. 4. The villagers mostly attend Kingshill GPs. This surgery is already stretched with patients often waiting over 30 minutes for a telephone call to be answered. 5. Much of the surrounding land is productive farm land. Our country needs to continue to feed itself. This greenfield land should not be used if at all possible. 	<p>The SA is too high-level to consider traffic levels, road width, availability of car parking spaces and dangerous junctions, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA does give consideration to whether a site is greenfield or brownfield, in addition to the Agricultural Land Classification under SA objective 9: soil. As outlined in site assessment criteria in Appendix D, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1 and/or 2 agricultural land will have a significant negative effect. Greenfield sites that contain a less than significant proportion (less than 25%) of Grade 1, 2 or 3 agricultural land will have a minor negative effect. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough. In the next iteration of the SA Report, greenfield sites that contain a significant proportion (more than or equal to 25%) of Grade 1, 2 and/or 3a agricultural land will receive a significant negative effect.</p>
42811169	Q7	<p>It's really unclear what you are asking of us here. I think some things that really stick out as being incorrect in the assessment is that:</p> <ol style="list-style-type: none"> a) Biodiversity loss is a given with the development planned. If enhancing biodiversity is an objective then development sites and other sites within the borough should be required to have enhancements to biodiversity as a pre-condition of development being allowed. This should be paid for by the developers as a condition of them being allowed to profit from the development of the land. b) There is an assumption that a given mass of development will result in investment in infrastructure (particularly with regards to accessibility and public/green transport. In practice this doesn't appear to have happened with any of the previous developments that have happened. Surely local planning guidance should necessitate certain targets in this regard, e.g. making sure developments have sufficient local services that can be accessed within walking distance, and generally making it unfavourable for cars to be used as the primary means of transport. c) There is an assumption that increased housing supply will result in better affordability. This really depends on developers being 	<p>The purpose of the SA is to appraise all options throughout the plan-making process. Biodiversity is dealt with under SA objective 5, which seeks "To protect and enhance biodiversity and geodiversity". Things like contributions to enhancing biodiversity are dealt with separately at planning application stage.</p> <p>Guidance does exist on walking distances, and has been used to inform the site assessment criteria (Appendix D of the Interim SA Report). Therefore, all sites have been appraised on the basis of them being within easy walking distance of different services and facilities. The SA does not determine which sites are allocated though. It is one of many factors that feed into the plan-making process.</p> <p>The baseline information section of the Interim SA Report (Appendix C) acknowledges the fact Tonbridge and Malling Borough is less affordable than the surrounding areas of Medway, Gravesham, and Maidstone. As mentioned in the SA, a higher level of housing supply has more potential to address housing affordability. The emerging Local Plan will contain a policy on the percentage of affordable housing that should be delivered on all new development sites.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are</p>

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		<p>mandated to build affordable homes regardless of the size of the development, and again I do not believe there is any evidence that recent developments around Tonbridge have had any impact on affordability. For example two small developments in Tonbridge, the old Pembury Road doctors surgery and the Priory Road houses don't have any affordable homes in them as far as I am aware.</p> <p>d) Under the Spatial Options, option 1 which protects the Greenbelt seems to have the same negative Biodiversity and environmental impacts as the other options. How can this be?</p> <p>What is clear from these assessments is that the negative affects outweigh the positive in all cases, so why are we not taking a harder line on development, either by really considering reducing the amount of supply or making the developments a bit more forward thinking and sustainable. Development doesn't have to be environmentally unfriendly if it is done in a progressive way with adequate investment in offsetting negative impacts (e.g. rewilding non-developed areas), changing people's behaviours (e.g. reduced reliance on cars) and increasing the demands on developers to build sustainable developments (e.g. providing green space, EV charge points, wild areas, insulated buildings)</p>	<p>not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Green Belt is a separate issue to biodiversity, the latter of which is considered under SA objective 5.</p>
42536801	Q7	The Sustainability Appraisal lacks sufficient evidence on Green Belt and climate change. Without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important, development of the options and then choice of an option is premature in advance of this study.	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the Borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is a section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p>
42721185	Q7	There is insufficient evidence both in terms of use of the green belt and climate change. No comprehensive study has taken place across LPAs that impact on TMBC, until such extensive studies are commissioned and the results known and tested this is all premature	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. The purpose of the baseline information is to identify the key sustainability issues affecting the Borough (outlined in Chapter 3). These are then used to develop the SA framework against which the Local Plan is assessed (the SA framework can be found in Chapter 4 of the Interim SA Report). There is a section in the baseline</p>

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			<p>information dedicated to climate change, containing information from numerous internal and external sources.</p> <p>The baseline information summarised in Appendix C has helped inform the appraisal of the Local Plan, including the strategic and spatial options, and reasonable alternative development site options.</p>
42722785	Q7	<p>It unreasonable to over-deliver and base the Local Plan on meeting the assessed housing needs target which we already believe is out of date and excessive. Also, there is no logic to suggest that building more housing to meet supposed demand will lower the price of houses in either of the Housing Market Areas it will simply stimulate more demand and more people will relocate here rather than meeting demand from within the borough. Option 2 will inevitably increase the likelihood of land being removed from the Green Belt for development which is opposed.</p> <p>Regarding the provision of healthcare facilities, it must be recognised that it is easier to build the physical medical centres than find trained medical staff who would work in them. The evidence that we have seen in the borough already is that we struggle to cope with the numbers currently required, let alone let alone 10% more. Trained medical staff are in great demand and West Malling Group Practice is a good example and are constantly understaffed.</p> <p>In terms of land where there are mineral deposits, where these are scarce, they should be worked before any development is considered.</p> <p>It is likely that huge damage will be caused by largescale development on the Green Belt around Tonbridge. Arterial roads and many junctions are already operating over-capacity, so the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense. The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by defining locations for a further 10% beyond the target set for the borough by the Government.</p> <p>The proposal that building 10% more homes will have a favourable impact on affordability for those looking to buy property is rejected. The Housing Market Delivery Study does not indicate that market demand will support Option 2.</p> <p>We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and we know that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options, although Option One is chosen the Sustainability Appraisal acknowledges that the council's previous policies have seen substantial development in the town centre. Although a relatively dense residential development, the area identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p>	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council determine which option to pursue. Quantum Option 2 receives a mixed minor positive and uncertain minor negative effect in relation to SA objective 1: health and wellbeing. The minor positive effect is due to the fact it "would provide the critical mass needed to support provision of health and wellbeing related infrastructure", whilst the minor negative effect is due to the fact "delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded". The effect is recorded as uncertain, as "there is no evidence indicating a particular threshold at which development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development".</p> <p>The SA gives consideration to Minerals Safeguarding Areas and recorded all effects against SA objective 13: material assets and waste as uncertain as "any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated".</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents".</p> <p>With regard to agricultural land, all five spatial options are recorded as having a significant negative effect against this objective (SA objective 9: soil). Only Spatial Option 2 is recorded as also having a minor positive effect, as a greater focus on the larger urban areas in the Borough may encourage a higher share of previously developed</p>

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		<p>There is insufficient importance placed on retaining agricultural land in order to encourage and facilitate food security for the UK in this report, so oppose development on Grade 1, 2 and 3 Agricultural Land.</p> <p>There are huge reservations about sites proposed in flood risk areas and although there are mitigating architectural solutions to the potential resilience of some town centre sites using SUDS, fluvial and surface water flooding will have ever-worsening impact on communities who will be living there.</p> <p>Modelling demonstrates that the flash flooding due to intense summer rain will be an increasingly frequent occurrence.</p> <p>Although Option 1 is selected out of the two options given for the future development of Tonbridge, development higher than 5 storeys is unacceptable and the architecture of any new development should be sympathetic to nearby buildings and in harmony with existing examples of good design such as those on Medway Wharf Rd, the gabled building in the High Street and Whitefriars Wharf which acknowledge the towns history. It is better to have development in the town centre where car use will be reduced because of services being close to hand and the accessibility of rail services than to develop on Green Belt land. In SW Tonbridge, Higham Wood and around Trench Wood and on Tonbridge Farm, where there are few alternatives to using cars to access services, we have a massively congested traffic system with an Air Quality Management Area at its heart. A one-way system to divert 50% of traffic away from Tonbridge High Street may mitigate the effects of more development in the town centre.</p> <p>Development in SW Tonbridge will have a detrimental effect on the setting of the High Weald Area of Outstanding Natural Beauty as the area is overlooked by it and of course negatively impacts respect biodiversity and the open aspect and character of the landscape would be detrimentally affected.</p> <p>As the report sets out the impact of development on the Green Belt around Tonbridge will have a knock-on effect in terms of flood risk to communities downstream such as East Peckham as it will increase the number of impermeable surfaces, because the water has to go somewhere!</p>	<p>land that comes forward for development. Consideration is also given to the Agricultural Land Classification in the site appraisals, whereby sites on Grade 1 or 2 agricultural land receive a significant negative effect and sites on Grade 3 agricultural land receive an uncertain significant negative effect.</p> <p>Consideration is also given to flooding in this SA, with sites in Flood Zone 3 and/or land with a 1 in 30 year risk of surface water flooding receiving significant negative effects, and sites in Flood Zone 2 and/or land with a 1 in 100 year risk of surface water flooding receiving minor negative effects.</p> <p>With regard to the future development of Tonbridge options, the SA has appraised these. Neither has yet been chosen.</p>
42722529	Q7	<p>It unreasonable to over-deliver and base the Local Plan on meeting the assessed housing needs target which we already believe is out of date and excessive. Also, there is no logic to suggest that building more housing to meet supposed demand will lower the price of houses in either of the Housing Market Areas it will simply stimulate more demand and more people will relocate here rather than meeting demand from within the borough. Option 2 will inevitably increase the likelihood of land being removed from the Green Belt for development which is opposed.</p> <p>Regarding the provision of healthcare facilities, it must be recognised that it is easier to build the physical medical centres than Snd trained medical staR who would work in them. The evidence that we have seen in the borough already is that we struggle to cope with the</p>	<p>To support the government's objective of significantly boosting the supply of homes, councils must identify a sufficient amount and variety of land to come forward where it is needed. Paragraph 61 of the National Planning Policy Framework (NPPF) states "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance". In line with this, TMBC commissioned a Housing Needs Survey to provide up-to-date evidence on housing need.</p> <p>The purpose of the SA is to appraise all options throughout the plan-making process, and this includes two quantum options: (1) Meeting Assessed Housing Need; and (2) Meeting Assessed Housing Need + up to 10%. The appraisal of these two options will help the Council</p>

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		<p>numbers currently required, let alone 10% more. Trained medical staff are in great demand and West Mallings Group Practice is a good example and are constantly understaffed.</p> <p>In terms of land where there are mineral deposits, where these are scarce, they should be worked before any development is considered.</p> <p>It is likely that huge damage will be caused by large scale development on the Green Belt around Tonbridge. Arterial roads and many junctions are already operating over-capacity, so the idea that we would increase this additional burden by voluntarily accepting 10% more housing makes no sense. The evidence highlights the fact that we have 7 Air Quality Management Areas which are likely to be negatively impacted even further by designating locations for a further 10% beyond the target set for the borough by the Government.</p> <p>The proposal that building 10% more homes will have a favourable impact on affordability for those looking to buy property is rejected. The Housing Market Delivery Study does not indicate that market demand will support Option 2. We need to focus on providing accommodation for those living locally and that can be achieved by building truly affordable rented homes and we know that social housing is the way to deliver this.</p> <p>Regarding the five Spatial Strategy Options, although Option One is chosen the Sustainability Appraisal acknowledges that the council's previous policies have seen substantial development in the town centre. Although a relatively dense residential development, the area identified around the Angel Centre and the commercial centre of Tonbridge will reduce the need to build elsewhere at a higher environmental cost and impact on the Green Belt.</p> <p>There is insufficient importance placed on retaining agricultural land in order to encourage and facilitate food security for the UK in this report, so oppose development on Grade 1, 2 and 3 Agricultural Land.</p> <p>There are huge reservations about sites proposed in flood risk areas and although there are mitigating architectural solutions to the potential resilience of some town centre sites using SUDS, fluvial and surface water flooding will have ever-worsening impact on communities who will be living there. Modelling demonstrates that the Tash Tooting due to intense summer rain will be an increasingly frequent occurrence.</p> <p>Although Option 1 is selected out of the two options given for the future development of Tonbridge, development higher than 5 storeys is unacceptable and the architecture of any new development should be sympathetic to nearby buildings and in harmony with existing examples of good design such as those on Medway Wharf Rd, the gabled building in the High Street and Whitefriars Wharf which acknowledge the town's history. It is better to have development in the town centre where car use will be reduced because of services being close to hand and the accessibility of rail services than to develop on Green Belt land. In SW Tonbridge, Higham Wood and around Trench Wood and on Tonbridge Farm, where there are few alternatives to</p>	<p>determine which option to pursue. Quantum Option 2 receives a mixed minor positive and uncertain minor negative effect in relation to SA objective 1: health and wellbeing. The minor positive effect is due to the fact it "would provide the critical mass needed to support provision of health and wellbeing related infrastructure", whilst the minor negative effect is due to the fact "delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded". The effect is recorded as uncertain, as "there is no evidence indicating a particular threshold at which development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development".</p> <p>The SA gives consideration to Minerals Safeguarding Areas and recorded all effects against SA objective 13: material assets and waste as uncertain as "any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated".</p> <p>Quantum Options 1 and 2 receive significant positive effects in relation to SA objective 14: housing. The SA states that "For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents".</p> <p>With regard to agricultural land, all five spatial options are recorded as having a significant negative effect against this objective (SA objective 9: soil). Only Spatial Option 2 is recorded as also having a minor positive effect, as a greater focus on the larger urban areas in the Borough may encourage a higher share of previously developed land that comes forward for development. Consideration is also given to the Agricultural Land Classification in the site appraisals, whereby sites on Grade 1 or 2 agricultural land receive a significant negative effect and sites on Grade 3 agricultural land receive an uncertain significant negative effect.</p> <p>Consideration is also given to flooding in this SA, with sites in Flood Zone 3 and/or land with a 1 in 30 year risk of surface water flooding receiving significant negative effects, and sites in Flood Zone 2 and/or land with a 1 in 100 year risk of surface water flooding receiving minor negative effects.</p> <p>With regard to the future development of Tonbridge options, the SA has appraised these. Neither has yet been chosen.</p>

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		<p>using cars to access services, we have a massively congested traffic system with an Air Quality Management Area at its heart. A one-way system to divert 50% of traUc away from Tonbridge High Street may mitigate the effects of more development in the town centre.</p> <p>Development in SW Tonbridge will have a detrimental eRect on the setting of the High Weald Area of Outstanding Natural Beauty as the area is overlooked by it and of course negatively impacts respect biodiversity and the open aspect and character of the landscape would be detrimentally affected.</p> <p>As the report sets out the impact of development on the Green Belt around Tonbridge will have a knock-on effect in terms of flood risk to communities downstream such as East Peckham as it will increase the number of impermeable surfaces, because the water has to go somewhere!</p>	
42443169	Q7	<p>The overall assessment of impact is too positive, regardless of option. The overriding assumption is that present health care and general infrastructure is sufficient in meeting this housing need. It is not. Where is there and NHS dentist locally, when we're wait times to see a GP less than 2 weeks. I could go on. The point is that any increased development will have a negative impact. Objective 10 will never be positive as any build will increase our carbon footprint as the building industry is not operating at net zero The technologies are not developed to do so. There is no uncertainty about this. Objective 14 has nothing to do with sustainability but everything to do about suitability of the possible developed housing stock. It should therefore be excluded.</p>	<p>The SA utilises a precautionary approach and is therefore not overly-optimistic in its appraisal of the Regulation 18 Local Plan.</p> <p>Due to the high-level nature of the quantum options, it is common to make assumptions regarding service capacity. The SA acknowledges that delivering growth beyond assessed needs has potential to cause capacity issues if existing healthcare facilities remain at current levels (paragraph 4.6 of the Interim SA Report). However, additional growth would be expected to deliver infrastructure provision/improvements to support it. Quantum Option 1 is recorded as having a minor positive effect in relation to SA objective 1: health and wellbeing, whereas Quantum Option 2 is recorded as having a mixed minor positive and uncertain negative effect in relation to SA objective 1.</p> <p>Although the quantum options receive minor positive effects in relation to SA objective 10: climate change mitigation, they are also expected to have negative effects as "New housing growth in the borough is likely to result in increased transport movements to access workplaces, and services and facilities day-to-day. A significant proportion of these trips are likely to be taken using private car given that a greater percentage of individuals in the borough commute to work using private car when compared to the national average" (paragraph 4.8). Further to this, the SA states "In the case of Option 2, the negative effects identified are potentially significant as going beyond assessed needs has particular potential to cause increased congestion on key routes within the borough". Although the SA does not reference building emissions here, this would not alter the effects already recorded for both Options in relation to SA10.</p> <p>Housing provision is considered a sustainability issue and therefore SA objective 14: housing should be retained.</p>
25351073	Q7	<p>The SA lacks sufficient evidence on Green Belt and climate change.</p> <ul style="list-style-type: none"> Without a comprehensive Green Belt study across all the LPAs in the Housing Market Areas (HMA) affecting T&M which identifies areas where GB functions are most and least important, development of the 	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>options and then choice of an option is premature in advance of this study. Please refer to responses under Q40 and 41.</p> <ul style="list-style-type: none"> • There is no climate change evidence base or topic paper. This would have indicated the patterns of growth that would be most efficient in reducing the existing carbon footprint and providing the lowest impact for the future. The Sustainability Appraisal (SA) (Appendix C) is not detailed enough for this to be reliably accurate. Without a climate evidence base, the Sustainability Appraisal scores on the impact of each option on the carbon footprint is meaningless. Therefore this consultation does not give consultees the opportunity to choose an option that demonstrates the lowest carbon footprint, except in a very superficial way. 	<p>With regard to climate change, the Council has commissioned evidence on this topic to support development of the Local Plan and this will feed into the baseline information contained within the next iteration of the SA.</p> <p>It is important to note that the SA findings only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers when selecting preferred options for a plan.</p>
45325537	Q7	<p>The answer to this question is split into two subsections Quantum Options and Spatial Options.</p> <p>Quantum Options</p> <p>We agree with Option 2 to the extent that it identifies a scenario whereby the Council has tested an option that goes above meeting its minimum housing need (plus 10%). However, as explained above, we recommend that a further reasonable alternative option is tested whereby a greater than 10% plus assessed housing need is met. This is to ensure the Sustainability Appraisal (SA) robustly appraises a scenario whereby it accommodates unmet need from London and other neighbouring boroughs, as well as better addresses affordability issues and providing for flexibility in the Plan (particularly if the spatial strategy includes for the delivery of larger strategic sites/ new settlements, which increases the risk of needs not being met should there be a delay in the delivery of those larger sites).</p> <p>We would not endorse Option 1, as it would fail to deliver the growth required to meet the housing and affordability issues in the Borough, would not provide for greater flexibility and resilience in meeting housing needs across the Plan period and would not provide for meeting the unmet needs of London and neighbouring authorities.</p> <p>It is noted that the SA at paragraph 4.6 is concerned that Option 2 could cause minor negative effects as it could put a strain on existing services. However, it is unclear how the SA has considered the way in which the provision of more homes could actually help deliver or fund via S106 contributions the expansion or provision of new services and infrastructure. In addition, the SA should recognise how additional growth at RSCs for example could enable a critical mass of population to be achieved to allow for services such as GP surgeries to return to RSCs where they may have left previously due to it being unviable for them to remain there. In addition, the SA should recognise that even if GP surgeries are provided within settlements, residents are free to choose which GP surgery to use and as such may not choose to use their 'local' GP and may prefer to use a GP surgery in a different settlement if there is capacity.</p> <p>In addition, we note that paragraph 4.9 questions whether Option 2 would be deliverable, as it considered that "... this level of housing</p>	<p>Quantum Option 2 (assessed need + 10%) was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on. An even higher growth scenario of assessed need + 20% would not yield particularly different SA effects to Quantum Option 2, as both options are relatively similar and so it would be difficult to distinguish between the effects each is likely to have.</p> <p>The SA acknowledges under Quantum Option 2 that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities. Therefore, the minor positive effect against SA objective 1: health and wellbeing for Quantum Option 2 is coupled with a minor negative effect. The SA states that all effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in health and other services and facilities becoming overloaded. The same applies in relation to SA objectives 2: services and facilities and 3: education. The SA also acknowledges in paragraph 4.6 that with regard to Quantum Option 2 "...this extent of new growth in the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>Residents cannot necessarily choose to attend a different GP surgery in a different settlement, as they must fall within the catchment area for a GP surgery.</p> <p>With regards to deliverability and historic delivery rates, providing housing that meets the assessed need would be more likely to be achieved than providing housing higher than the assessed need.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>delivery would be in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study. Therefore, there is uncertainty attached to this option as there is a question mark around its deliverability." However, we would be concerned with the deliverability of this Option being questioned because of historic trends, given a driving factor for historic delivery rates would have been any constraints to deliver new homes applied by the prevailing planning policy context.</p> <p>Spatial Options</p> <p>As identified above, it is therefore considered that a balanced and blended approach to Spatial Options 4 and 5 will likely be required to meet the housing needs of the Borough. These Spatial Options will best ensure that a wide range of sites, including smaller and larger plots, development adjacent to settlements, on green field and on brownfield are delivered, which will assist in providing for a consistent supply of homes across the Plan period.</p>	
42801089	Q7	<p>Specifically I think the sustainability appraisal should respond to the climate emergency; this should set policy using current best practices such as LETI. I would expect to see as a minimum a requirement for net zero development and a requirement that no fossil fuel usage would be accepted.</p>	<p>It is not the role of the SA to set out policy based on current best practices, rather it is the role of the Local Plan. The SA appraises all options throughout the plan-making process against the SA framework, which comprises a number of SA objectives. SA objective 10 seeks "To reduce greenhouse gas emissions so as to minimise climate change". In the next iteration of the SA Report, the following sub-objective will be added against this objective: "To contribute towards achieving net zero".</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. There is a section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p>
42255521	Q7	<p>Nothing has been taken into account of hybrid working and the needs to cover this. Infrastructure is clearly already at capacity so any housing would need much larger road network as there is even less public transport options. Schools are struggling to meet demands already as well as primary care options. You could build more surgeries but who will staff them? Build more schools but again where will the staffing come from?</p> <p>Increasing demand in TMBC will have direct impact on the two major hospitals under Maidstone and Tunbridge Wells Trust.</p>	<p>Hybrid working has resulted in an increase in the number of people working from home. Therefore, people do not need to travel into their offices as much as they used to, pre-COVID-19.</p> <p>Consideration is given to public transport under SA objective 10: climate change mitigation.</p> <p>With regard to school capacity (SA objective 3: education), the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown</p> <p>With regard to the capacity of medical centres (SA objective 1: health and wellbeing), the SA does not take this into consideration, as it is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however,</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).
42606657	Q7	Whilst chapter 4 is focused on the two options for meeting Assessed Housing Need, the subsequent spatial options refer simply to 'development' (not saying what type of development). Although the SA is clearly looking at housing development, the reference just to 'development' in the Reg 18 draft is likely to cause confusion. These strategic policy options are clearly about where to locate housing development and that should be made clear.	The five spatial options refer to development generally, not specifically residential development. The term 'development' in this section of the Interim SA Report should be taken to mean residential, employment and mixed-use development.
42716289	Q7	Many of the assessments are weak and do not go into enough detail on each site	Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of development which is unknown at this stage.
42587169	Q7	The call for sites and subsequent assessment do not take into account any planning history of those sites. It feels too theoretical (and in the developers' interests) to maximise the number of plots on a site but no reference seems to be made to the planning history of a site where applications for much lower densities have not been approved. The strategic policy options seem to be flawed therefore.	SA should not and does not take into consideration the planning history of sites, as this would mean that some sites would be appraised using more detail than others when they should all be appraised to a consistent level of detail.
42720097	Q7	I do dispute some of the findings of the report, however it would be useful if a summary could be provided which is less technical.	The SA Report was accompanied by a Non-Technical Summary.
42742625	Q7	Borough Green is not a "LARGE rural service centre" as described in the report. I feel the area may therefore be targeted for more development than it should be. I feel there is too much focus on developing green space - the preferences should be building in urban areas and on brownfield sites. Large new settlements tacked onto existing smaller settlements would fundamentally change the character of the area and would needlessly destroy green field and green belt land - the overriding characteristic of the Borough.	The respondent is referring to paragraph 4.20 of the Interim SA Report, which sets out the findings of the strategic policy options. The term "large" describes the size of Borough Green compared to some of the other rural service centres. The use of the term "large" would not result in Borough Green being targeted for more development than it should be. The Council cannot only develop brownfield sites, as there would not be enough land to provide the housing need. The SA gives consideration to the effects on landscape under SA objective 6: landscape and townscape. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.
42765537	Q7	The negative use of greenfield sites needs to be a maximum negative effect merely by using a greenfield site. All development should focus on brownfield.	The SA does give greenfield sites negative effects, and brownfield sites positive effects under SA objective 9: soil. Please refer to the site assessment criteria contained in Appendix D of the Interim SA Report.
42785921	Q7	I can only comment on a few of the sites (not the whole area) so I am focused only on 59735, 59798, 59801, 59804 and 59835. Whilst I	The SA is one of many factors that feed into the plan-making process. It does not specifically identify which sites should come forward

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		understand that no decision has yet been made, knowledge of the local area suggests that some of these sites would be unsuitable and were previously ruled out in the previous consultation as not available for development. Some of these overlap and so it isn't obvious if there is any "joined-up" thinking going on here as there are various assessment outcomes which perhaps may need to be considered too. More in Question 8 below.	through allocations in the Local Plan but provides an objective assessment of their sustainability. The previous SA is not relevant, as it was an SA of a different plan and so does not form part of this SA.
38330753	Q7	We believe that these options have been manufactured by a computer however the algorithm's are not accurate enough and do not include any local knowledge. Although the objectives may cover most eventualities, nearly all assessments are wrong due to a lack of local knowledge by the compliers of the local plan.	The appraisal of strategic policy options has not been generated by a computer, but instead undertaken manually. The appraisals have been informed by numerous data sources including from the Borough Council, County Council, Natural England, the Environment Agency and Historic England.
42437729	Q7	The Interim Sustainability Appraisal Report is only considering the current position and constraints. For example, when assessing the spatial options, particularly for Option 5, it does not consider what this option would look like if services were improved - i.e. new healthcare facilities, new schools, new transport links. Why not? If you continue to appraise against the same restricted criteria you will get the same answer - we know the answer isn't right otherwise the previous plan would not have been withdrawn. It very much feels like this plan is being drafted to direct towards predetermined answers rather than looking at the plan with a blank sheet of paper.	The purpose of the SA is to appraise all options throughout the plan-making process, against the current baseline (Appendix C of the Interim SA Report). The baseline information provides the basis against which to assess the plan, as set out in Planning Practice Guidance 016-20190722.
42447265	Q7	These documents are extremely complex for laypersons to absorb and truly understand. It is clear though that you underestimate the positive effects of matters such as water features and resources.	The SA Report was accompanied by a Non-Technical Summary. The SA Report itself is necessarily technical in nature given the range and quantity of data that needs to be gathered and analysed.
42606657	Q7	Whilst chapter 4 is focused on the two options for meeting Assessed Housing Need, the subsequent spatial options refer simply to 'development' (not saying what type of development). Although the SA is clearly looking at housing development, the reference just to 'development' in the Reg 18 draft is likely to cause confusion. These strategic policy options are clearly about where to locate housing development and that should be made clear.	The five spatial options refer to development generally, not specifically residential development. The term 'development' in this section of the Interim SA Report should be taken to mean residential, employment and mixed-use development.
42683265	Q7	This is very hard to follow and not set out in a manner conducive to informed and widespread public comment. Even the colour assessment is not clear as the hues do not follow a logical gradation to reflect positive and negative outcomes. The limited options appraised are already flawed by the incorrect hierarchy of settlements which fails to reflect the connectivity and sustainability of each location, only the historic size of settlements. Most of the sustainability criteria, water, land, historic environment, air quality, climate and human health as well as economy will be harmed if the housing needs are met by locating new housing distant from the main	The SA Report was accompanied by a Non-Technical Summary. The SA Report itself is necessarily technical in nature given the range and quantity of data that needs to be gathered and analysed. The PDF version of the Non-Technical Summary available online is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018). The template abides by WCAG 2.1 regulations to the highest standard (level AAA). The report is therefore accessible to those whose are colour blind.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>transport hubs, motorway, A21 and railways, unless major new infrastructure is inserted, which is currently not affordable.</p> <p>The determining factor for the siting and provision of new dwellings must be proximity to the existing transport network and the hierarchy for development locations should reflect this.</p> <p>1. Intensification of development in established urban areas with railway stations, specifically Medway gap, Snodland and Tonbridge. Comprehensive new development in the centre along the High Street, rethinking the retail environment and on Railtrack land round the station. A eastern bypass/ ring road link is required to reduce through traffic.</p> <p>2. New development around all the rural railway hubs, in particular at West Malling and Hildenborough Stations and Borough Green. There will be some loss of green space, but this harm is outweighed by meeting the housing need in locations with pedestrian access to the rail network or direct access to the motorway network.</p> <p>3. Development in isolated rural settlements, distant from these transport hubs, should be limited, regardless of whether they are larger, Hadlow, East Peckham, or smaller villages, as non of these settlements has sufficient services to be self sustaining and all will just put more cars on the borough's roads with more bottlenecks and pollution. Extended development of these rural settlements will further degrade the rural environment, reduce the agricultural & ecological potential of the borough and increase suburbanisation, with no compensating benefits.</p>	<p>Chapter 4 of the Interim SA Report provides an appraisal of quantum options, spatial options, the future development of Tonbridge options and options to prevent merging of settlements in the north east of the Borough. The spatial options look at different options for the distribution of development within the Borough, with the options covering larger urban areas scoring more positively than others.</p> <p>Spatial Option 1 covers sites within and adjacent to settlements beyond the outer Green Belt boundary and Areas of Outstanding Natural Beauty, Spatial Option 2 covers sites within and adjacent to defined urban settlements, Spatial Option 3 covers sites within and adjacent to defined urban and rural service centre settlements, Spatial Option 4 supports distributed development across the Borough, which will include more rural areas, and Spatial Option 5 considers a new settlement. The defined urban settlements have good access to public transport links compared to more rural areas, and this is reflected in the appraisal of these options – particularly in relation to SA objective 10: climate change mitigation.</p>
42721697	Q7	There is an obvious conflict of interest between number 14 and many of the others.	<p>As explained in paragraphs 1.10 to 1.13 of the Interim SA Report, SA is an assessment of the likely effects of a plan or programme (in this case TMBC's Local Plan) on the environmental, social and economic aspects of sustainable development.</p> <p>The SA provides an objective assessment of all Local Plan options against fourteen SA objectives, which cover these three aspects of sustainable development, and this includes housing delivery.</p>
42742625	Q7	<p>Borough Green is not a "LARGE rural service centre" as described in the report. I feel the area may therefore be targeted for more development than it should be.</p> <p>I feel there is too much focus on developing green space - the preferences should be building in urban areas and on brownfield sites. Large new settlements tacked onto existing smaller settlements would fundamentally change the character of the area and would needlessly destroy green field and green belt land - the overriding characteristic of the Borough.</p>	<p>The respondent is referring to paragraph 4.20 of the Interim SA Report, which sets out the findings of the strategic policy options. The term "large" describes the size of Borough Green compared to some of the other rural service centres. The use of the term "large" would not result in Borough Green being targeted for more development that it should be.</p> <p>The Council cannot only develop brownfield sites, as there would not be enough land to provide the housing need. The SA gives consideration to the effects on landscape under SA objective 6: landscape and townscape.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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			SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.
42765537	Q7	The negative use of greenfield sites needs to be a maximum negative effect merely by using a greenfield site. All development should focus on brownfield.	The SA does give greenfield sites negative effects, and brownfield sites positive effects under SA objective 9: soil. Please refer to the site assessment criteria contained in Appendix D of the Interim SA Report.
42585633	Q7	<p>Chapter 4 appears to try to compare options with no specific conclusion. However the descriptions are not balanced.</p> <p>With regards to Kings Hill CP11 avoids any development outside the town itself, CP12 similarly limits development around West Malling and CP13 should be taken into account.</p> <p>There are significant travel issues , Kings Hill is not connected to the cycle /public footpath network, joint use of pavements for pedestrians and cyclists where pavements do not meet the required guidelines deters the take up of active travel and discourages walking and access for disabled people. The result is rapidly deteriorating infrastructure for active travel</p>	<p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p> <p>The SA is too high-level to give consideration to specific road networks and congestion. However, in the site-specific appraisals, consideration is given to the proximity of sites to existing walking and cycling paths. It will be the role of the Local Plan to help address the active travel issues mentioned by the respondent.</p>
42801089	Q7	Specifically I think the sustainability appraisal should respond to the climate emergency; this should set policy using current best practices such as LETI. I would expect to see as a minimum a requirement for net zero development and a requirement that no fossil fuel usage would be accepted.	<p>It is not the role of the SA to set out policy based on current best practices, rather it is the role of the Local Plan. The SA appraises all options throughout the plan-making process against the SA framework, which comprises a number of SA objectives. SA objective 10 seeks "To reduce greenhouse gas emissions so as to minimise climate change". In the next iteration of the SA Report, the following sub-objective will be added against this objective: "To contribute towards achieving net zero".</p> <p>Appendix C provides the baseline information for Tonbridge and Malling. There is a section in the baseline information dedicated to climate change, containing information from numerous internal and external sources.</p>
42815521	Q7	<p>THIS QUESTION IS WORDED AMBIGUOUSLY / POORLY. You appear to be including both Quantum and Spatial Options in the same consultation question and this will confuse many respondents.</p> <p>Since assessed housing need includes inflow from other HMAs it is hard to see how even Quantum Option A could be said to have any positive health impacts FOR THE RESIDENTS OF THIS BOROUGH. As it is there is significant pressure on both health and education services and the suggestion that by increasing demand the services will magically improve is not borne out by historical experience.</p> <p>It is also highly questionable whether relaxation of planning rules as required in Spatial Options 2 and 3 will encourage economic growth or business development.</p>	<p>Quantum Options 1 and 2 both receive minor positive effects in relation to SA objectives 1: health and wellbeing and 3: education, as both support growth in the Borough, which has the potential to support the delivery of new healthcare and education facilities. It is expected that both quantum options would provide the critical mass needed to support provision of health and education facilities. The minor positive effect Option 2 is expected to have is coupled with a minor negative effect, as delivering growth beyond assessed needs has more potential to cause capacity issues at existing health and education facilities if they become overloaded.</p> <p>All five Spatial Options receive significant positive effects in relation to SA objective 4: economic growth, as they will each deliver employment land within the Borough, which will provide a range of employment opportunities for residents. Spatial Options 1, 4 and 5 also receive minor negative effects in relation to this objective, as they may be too constrained in their focus on growth in certain areas of the Borough, including smaller rural settlements that are poorly connected to the main employment locations.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
45174209	Q7	<p>Regarding site #59470 & #59777 in particular, no, I do not. The statement regarding the land on Broadwater Farm being Grade 2 land is misleading. The soil analysis carried out on land in the Medway gap by KCC clearly shows it as Grade 1 and Grade 2. Any reference to adverse and minor negative effects of adopting Options 1 or 2 should be disregarded as building on this farmland and open countryside would be irreversible with blatant destruction of these assets. At a time when food security is a pertinent concern, Grade 1 agricultural land should surely be a protected asset. As noted, the borough has a duty to conserve and enhance soil resources.</p> <p>Option 3, understates the negative impact to water features and resources, particularly given the significant hydro-geological features on the land in question which would most certainly be damaged if not destroyed by construction at Broadwater Farm Site 59740.</p> <p>Most seriously, any expansion North of Kings Hill would contribute to the coalescence of communities which is in direct contravention of the stated preferred strategy of the Local Plan.</p>	<p>Sites 59740 and 59777 are both recorded in the Interim SA Report as receiving significant negative effects in relation to SA objective 9: soil, as they are greenfield and contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regards to the strategic policy options, the SA states that a high proportion of land between Kings Hill, West Malling and East Malling is Grade 2 agricultural land. Due to the high-level nature of the options to prevent merging of settlements, it is difficult for the SA to be more specific than this. The SA does not say that there is no Grade 1 agricultural land here, just that most of it is Grade 2. Options 1 and 2 receive minor positive effects on SA objective 9: soils, as they would prevent development on the agricultural land. The significance of all effects has been applied correctly.</p> <p>With regard to Option 3, this is no change to the existing Green Belt boundary and no gap policy. Due to the high-level nature of the options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p>
24925793	Q7	<p>Yes (overall). With reference to our comments above (in Q.6), Option A [=Quantum 1] has more significant positive and less negative scores, than Option B [=Quantum 2], as would be expected.</p> <p>However, we feel that the scoring of Objective 2, for Option 2, does not reflect the potential significant negative impacts of this option; in-terms of the severe highway congestion and other infrastructure pressures (inc. local services/schools), such as in Tonbridge (see Q.4, Q.11 & Q.19).</p> <p>2Office for</p>	<p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education. The SA is too high-level to give consideration to traffic congestion, and so the Council will commission additional evidence on this.</p>
43309729	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>1.2.29 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.30 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.31 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.32 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner.</p>	
43311521	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>1.2.30 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.31 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.32 The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.33 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.34 In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we support the positives that will be achieved in respect of the provision of housing, reduction in greenhouse emissions and soil resourcing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.35 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>Site 59775 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains an existing green infrastructure asset. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located near any settlements in a rural location. Sites located on the edge of a settlement may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>1.2.36 The desktop nature of the site assessment is also of concern. Based on a human judgement there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>1.2.37 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.</p>	
43313313	Q7 of the questionnaire	<p>Question 7</p> <p>The assessment assumes that we have the services and infrastructure. I have mentioned the impact on roads and drainage. We also need to consider schools - the majority of senior school pupils are bussed out to various locations. As far as I am aware we do not have any senior school facilities on Kings Hill. This does not impact me personally, but there are numerous families for whom this is a key concern.</p> <p>The matter which does cause me massive inconvenience is the lack of access to adequate GP services. The West Malling Group Practice cannot cope with its current patient list and there is no way it could or should take on more.</p> <p>I know we have added an Aldi to our supermarket offerings, but there is still very little in the way of alternative shops in the centre. If Kings Hill is to become larger we need to have more on site shopping and eating options.</p> <p>Question 8 re 59797 & 59800</p> <p>I have already raised the issue of the impact of loss of the company running the golf course and the associated employment and amenities.</p> <p>The course is designated a Local Wildlife Site and so losing the space would affect local wildlife.</p> <p>Obviously if these two sites were developed it would open a much larger area - the rest of the course - for development, but would immediately impact on the green space requirements for the estate, the value of the houses for those living there and create a much less amenable place to live. It would also reduce the social and environmental benefits of the area to walkers, cyclists, runners, horse riders, who use the areas around and across the course alongside the golfers themselves. That would have a direct impact on the mental health of individuals. For me my golf is a significant part of my managing stress and depression or low mood, from which I personally suffer. I am not alone in benefitting massively from that. That could result in Kings Hill ceasing to be a desirable place to live and becoming a run down overpopulated area.</p> <p>The current medical roads, drainage and schools cannot support the existing population.</p> <p>Further development like this would reduce the proportion of green space and go against the original promise to conclude a golf course as an amenity.</p>	<p>The SA is too high-level to consider the impact of development on roads and so the Council will commission additional evidence on matters including traffic. Drainage is considered under SA objective 8: water.</p> <p>The SA acknowledges that there are no secondary schools in Kings Hill. As there are primary schools in Kings Hill, most sites in the area receive minor positive effects against SA objective 3: education. All effects against this objective are recorded as uncertain, as effects will depend on there being capacity at those schools to accommodate new pupils.</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities. Sites 59797 and 59800 are expected to have a negligible effect in relation to SA objective 4 as "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>The sites receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within 250m of Kings Hill Golf Course, Cattering & Hoath Wood Local Wildlife Site and area of Ancient Woodland. They also contain green infrastructure assets. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Sites 59797 and 59800 receive uncertain significant negative effects in relation to SA objective 1: health and wellbeing (as part of a mixed effect), as they contain Kings Hill Golf Course. They also receive minor</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			positive effects in relation to this objective as they are within 800m of other areas of open space, and walking paths.
43395937	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>1.2.30 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.31 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.32 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.33 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.34 In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we support the double positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.35 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p> <p>1.2.36 The desktop nature of the site assessment is also of concern. Based on a human judgement there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>1.2.37 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>Site 59654 is incorrectly recorded as containing an existing green infrastructure asset, and therefore incorrectly receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. In the next iteration of the SA Report, site 59654 will receive a minor negative effect, as it is within 250m and 1km of an SSSI (Wateringbury). All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a minor negative effect in relation to SA objective 6: landscape and townscape, as it is located adjacent to a settlement. Sites located adjacent to settlements may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>

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43397313	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>1.2.31 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.32 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.33 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.34 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.35 In respect of this question, the SA only assesses the upper north west corner and not the whole of the parcel that is within their control. Accordingly, the assessment is not based on sound or credible evidence.</p> <p>1.2.36 Notwithstanding that the whole site has not been fully considered, and must be to ensure that all reasonable options are taken into account, we support the positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.37 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment and this should represent a strong positive.</p> <p>1.2.38 The desktop nature of the site assessment is also of concern. Based on a human judgement it is clear that there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive. Furthermore, the land is well related to Tonbridge.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>Site 59641 receives a minor negative effect in relation to SA objective 5: biodiversity and geodiversity, as there is a Local Wildlife Sites (River Medway) and a Local Nature Reserve (Haysden Nature Reserve) within close proximity of the site. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located near any settlements in a rural location. Sites located on the edge of a settlement may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>

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		1.2.39 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.	
43545921	Q7 of the questionnaire	<p>Question 7: Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>The text of Chapter 4 of the Interim SA report provides a range of options. The methodology for assessing the options in accompanying tables in chapter 4 is over-complicated, leading to confusion and no clear conclusions. It would have been more appropriate to rank the impact in numerical terms (eg 1 to 5) where 1 is a positive impact and 5 is a negative impact.</p>	<p>The SA Report was accompanied by a Non-Technical Summary. The SA Report itself is necessarily technical in nature given the range and quantity of data that needs to be gathered and analysed.</p> <p>Chapter 2 of the Interim SA Report explains how the assessment has been undertaken and Table 2.1 provides a key to the symbols and colour coding used throughout the report. The assessment criteria against which the sites have been appraised are provided in Appendix D.</p>
43548193	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>To some extent we do agree with the findings, but, for example we do consider that a great deal of emphasis is placed on air quality considerations. The Council seem to be concerned with the location of development that could impact on current Air Quality Management Areas (AQMA) now. In our opinion the existing rise in the uptake of hybrid and electric vehicles and future moves towards hydrogen will mean that over the lifetime of the local plan, AQMA's will not be of such high importance and the location of development relative to existing urban areas now should be more important. In summary, development that could give rise to some harm to an AQMA now, but which provides greater prospects for walking and cycling and provides shorter journey times overall should not score so poorly in the assessment now.</p> <p>Q.8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number.</p> <p>No. There are significant errors in the site assessments based on incorrect assumptions made about the sites that Millwood are promoting. In relation to Millwood's Haysden site, we comment as follows:</p> <p>SA Objective 3</p> <p>In particular we believe that there is school and college place capacity at the current time, and if this supply should diminish we would expect it to be mitigated via a legal agreement submitted in support of a planning application. This matter should therefore score more positively.</p> <p>SA Objective 5</p> <p>The emerging proposals for the site will retain and enhance the existing pond and deliver a net gain in biodiversity overall with no adverse effects, but we agree this is uncertain at this stage. The correct score should be 'uncertain positive'.</p>	<p>Noted.</p> <p>As it is unknown whether all schools within the Borough have capacity to accommodate new pupils or not, all effects against SA objective 3: education are recorded as uncertain.</p> <p>This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. biodiversity net gain). As site 59775 contains an existing green infrastructure asset, it receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59775 is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, the site correctly receives a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59775 correctly receives a minor negative effect in relation to SA objective 8: water, as it contains land with a 1 in 100 year risk of surface water flooding. This is in accordance with the site assessment criteria presented in Appendix D of the Interim SA Report.</p>

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		<p>SA Objective 7</p> <p>The proposed development of the site is not likely to have any adverse impacts on heritage assets and we consider the score should be 'Negligible' if not positive.</p> <p>SA Objective 8</p> <p>We consider that the site is not adversely affected by flooding and consider that the score should be amended to 'negligible'.</p>	
43745089	Q7 of the questionnaire	<p>Question 7.</p> <p>Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities. In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>Question 8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we support the double positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment and this should represent a strong positive.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>Site 59656 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains an existing green infrastructure asset and is within 250m of some areas of ancient woodland. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site incorrectly receives a significant negative effect in relation to SA objective 6: landscape and townscape when it should receive a minor negative effect, as although it is outside of a settlement, it is adjacent to its edge. Sites located on the edge of settlement may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effect.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>

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		The desktop nature of the site assessment is also of concern. Based on a human judgement it is clear that there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive. In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.	
43781249	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>1.3.30 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%).</p> <p>1.3.31 A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.3.32 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>Page 11 of 25</p> <p>1.3.33 The same principle applies with provision of new essential services and education and training facilities, with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.3.34 In our view the SA looks unreasonably negatively on growth and development rather than looking in an impartial manner or a basis for opportunity. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
42832833	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>No – Option 2 provides the scenario that will deliver the required Objectively Assessed Housing Need ('OAHN') (839 dpa) +10%. Whilst the additional mass could put local services/infrastructure under pressure, this could be mitigated through financial contributions from the developers and a robust and clear infrastructure delivery strategy that supports this level of growth. As set out in the response to Question 6, the OAHN should be a minimum and through the emerging Local Plan, there is an opportunity to ensure local services/infrastructure are enhanced and deliver what is required to</p>	<p>Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Quantum Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>With regard to SA objectives 10: climate change mitigation and 12: air quality, providing more housing as proposed under Quantum Option 2 is likely to increase the number of cars on the road and associated emissions. As Option 2 proposes more development than Option 1, it is expected to have more significant effects than Option 1.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>support growth in a sustainable manner – this includes the enhancement to local services/infrastructure.</p> <p>In respect of Objective 10 (to reduce greenhouse gas emissions) and 12 (to improve air quality) – whilst providing over and above the OAHN, as set out in the Sustainability Appraisal, development is “likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents”.</p> <p>Therefore, to support the Local Plan, it is vital that the Council brings forward an Infrastructure Delivery Plan ('IDP') to identify the infrastructure/local services required to support the growth scenario chosen (either Option 1 or Option 2). In the expectation that an IDP is brought forward alongside the preference for growth to be distributed across the Borough, we do not consider Option 2 should be scored less positively than Option 1.</p>	
44200193	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p>	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.
25378817	Q7 of the questionnaire	<p>Q7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report?</p> <p>It is difficult to assess a spatial strategy without knowing how much development it will deliver and where that development will be. This</p>	The assessed need + 10% was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on. Past delivery is a reasonable factor for the Council to take into account when considering the reasonableness of higher growth options. The Council had not received any formal requests to meet the unmet needs of neighbouring authorities, although the + 10% does provide some flexibility.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>can be seen in the findings in chapter 4 where there are a number of uncertain outcomes in appraisals of the various options.</p> <p>It is difficult to assess a spatial strategy without knowing how much development it will deliver and where that development will be. This can be seen in the findings in chapter 4 where there are a number of uncertain outcomes in appraisals of the various options.</p> <p>Our first observation of the Sustainability Appraisal (SA) is with regard to the quantum of development that has been tested as a reasonable alternative. The Council has tested an option that meets needs and one that meets needs plus 10%. We would suggest that the Council needs to test a higher figure in relation to the uncapped need for housing and an option that includes meeting some of the unmet needs from London or the need of another neighbouring areas. These are real scenarios facing the Council and should be tested in the SA to ensure it is robust in its consideration of reasonable alternatives. A failure to test higher levels of delivery could have, in particular, significant consequences with regard to the duty to co-operate. A failure to consider a higher level of delivery would show that such matters have not been properly considered meaning not only that the SA lacked the necessary robustness but also that the Council's consideration of cross boundary issues had not maximised the effectiveness of the local plan as required by section 33A of the Planning and Compulsory Purchase Act 2004.</p> <p>Secondly, we are concerned with the assessment of the options related to quantum and the statement in paragraph 4.9 that there is uncertainty as to whether the 10%+ option is deliverable given that it would be in excess of what has been delivered in the last decade. This assumption is based on the Housing Market Delivery Study (HMDS) which examines past delivery rates and uses these to make assumptions as to the capacity of the area to deliver homes in future. Whilst helpful to understand the rate at which homes have been delivered in the past, we would caution whether this indicates any uncertainty as to whether the 10%+ option is deliverable. The ability of an area to support housing growth will relate principally to the range of sites allocated through the chosen spatial strategy rather than an innate capacity in the market as to the amount of growth that can be achieved. It is also questionable as to whether the SA should even comment on deliverability of the requirement at such an early of plan preparation given that there is no indication as to how many homes each option would deliver. The Council should not be seeking to limit growth on the basis of what has been achieved in the past.</p> <p>Thirdly, we note that the SA assumes a more negative outlook for the 10%+ option with regard to objectives 1, 2 and 3 broadly on the basis of the capacity of local infrastructure and services to cope with the additional growth. We would suggest that until clarity is known as to where growth will occur and the availability of services in those areas it is not possible to state whether or not services will be sufficient with regard to either option. In fact, a larger quantum of housing could ensure that some services are retained or expanded through the</p>	<p>The SA refers to the deliverability of options because the SA is only required to appraise options that are reasonable and if they are not deliverable, they could be considered not to be reasonable.</p> <p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>The SA acknowledges that an increase of 10% has more potential to cause capacity issues with existing services and facilities. However, it also acknowledges that with regard to an increase of 10%, the Borough "has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities".</p> <p>With regard to SA objective 10: climate change mitigation, this relates more specifically to access to active and sustainable transport modes so as to minimise reliance on the private car.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>additional council tax, S106 contributions and per capita funding as a result of the additional homes provided.</p> <p>Finally, the SA makes the assumption with regard to objective 10 that the delivery of more homes is broadly similar, but the negative effect is more significant with regard to option 2. When considering these options, it is important to remember that the issue of climate change is global. Whilst an increased number of homes may increase the population in Tonbridge and Malling it doesn't increase the country's overall population. Building additional homes however may allow more people to live in newer more sustainable homes that will reduce energy consumption and CO2 emissions. Each new build home produces just a third of the carbon emitted by older homes, a saving of 2.2 tonnes of CO2 every year by using on average 100 kWh of energy per m2 of house space compared to 259 kWh per m2 for an older property. It is important that the SA recognises this positive contribution moving forward.</p>	
42006241	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>Quantum Options</p> <p>The two options set out are meeting the housing figure and meeting the housing figure +10%. We consider that if these figures are to include the windfall allowance (calculated as 19.5% of the overall housing figure), then it would be reasonable to include meeting the housing figure +19.5% to compensate for this as the windfall figures are not committed sites.</p> <p>We consider that due to the number of unknowns within this assessment (e.g. no evidence indicating the thresholds where facilities become overloaded and the undetermined provision that is made alongside new development), the difference between option one and option two is largely unknown at this stage.</p> <p>Spatial Options</p> <p>We consider that within Objective 14: to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenure, greater positive weight should be given to the opportunity within Option 4 to deliver a range of dwellings. Options 1-3 concentrate on development in a smaller number of areas whereas option 4 allows for a much wider range of development. This is more likely to lead to smaller sites coming forward which are more likely to be of high quality and are likely to be delivered quickly.</p> <p>The Future Development of Tonbridge Options</p> <p>In relation to Objective 14: to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenure, we consider it important to highlight the difference between the two options set out. Option 1 is to optimise densities on development sites within Tonbridge, where as Option 2 is conservative densities on development sites within Tonbridge, minimising the intensification of</p>	<p>Due to the high-level nature of the spatial options, it is difficult for the SA to be more specific than it already is, particularly as most effects will depend on the eventual location of housing development which is unknown at this stage.</p> <p>With regard to SA objective 14: housing, Option 4 already receives a significant positive effect in relation to this objective and so although it may deliver more of a range of dwellings compared to some of the other options, this effect cannot be upgraded any more than it already is. All of the growth strategy options will deliver housing and employment land within the Borough, which will provide a range of housing types and employment opportunities for residents.</p> <p>The minor negative effect Option 1 (Future Development of Tonbridge Options) receives in relation to SA objective 14: housing is considered appropriate. The SA explicitly states "In terms of housing, optimising densities on development sites within Tonbridge is likely to deliver higher density development, that may be less desirable, potentially focusing on smaller units and flats. Therefore, Option 1 is expected to have a minor negative effect in relation to SA objective 14: Housing. Whereas, Option 2 is expected to have a minor positive effect, as it is more likely to deliver higher quality housing with a mix of sizes, types and tenures, that doesn't focus too much housing in one area".</p> <p>With regard to sites 59713 and 59715, these sites have been appraised on a 'policy-off' basis, which means they have been appraised on their physical constraints only with no consideration given to mitigation. This ensures all sites are appraised on a consistent basis. If the sites are allocated in the Local Plan via policy containing mitigation measures, they will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the built-up areas. Maximising densities may give the same number of dwellings, however the appropriate mix of sizes, types and tenure will not be met. Option 1 for objective 14 is considered to be a minor negative effect as part of the appraisal due to potentially fewer desirable units and flats in an intensified area. It should be considered a major negative due to the likelihood of delivering lower-quality housing without a mix of sizes, types and tenure. This goes against every element of the objective and should therefore be considered a major negative.</p> <p>Q.8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number.</p> <p>General observations of the individual site assessments</p> <p>Esquire Developments are currently promoting two sites that have been identified in Appendix D of the Interim Sustainability Appraisal Report. Site 59713 also known as Land North of 351 Hermitage Lane, Maidstone has been submitted under application ref. 22/00907/FL for 42 dwellings and is currently awaiting a decision (Appendix 1 of these representations) and Site 59715, also known as Land North, East and South of 161 Watlington Road has been submitted under application ref. 22.01570/OA as an Outline application for up to 52 dwellings (Appendix 2).</p> <p>Accordingly, a significant amount of technical work has been undertaken on the sites to establish their suitability for development. Accordingly, the degree of detail contained in these applications is more so than the high-level assessment undertaken in the Sustainability Assessment.</p> <p>As a result, we are able to identify that there are shortcomings with some of the conclusions in the Sustainability Assessment that are not supported, and alternative conclusions reached on site specific matters including where generalised assumption has skewed the assessment in favour of large sites over 00 dwelling s- see SA Objective 14). This is set out in Appendix 3 of this statement.</p>	
42819617	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>3.36 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to Sustainability Appraisal to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. We generally support the overall scope and methodology set out in the SA. However, we are of the view that it fails to assess the impact of the differing scenarios accurately.</p> <p>3.37 The SA includes an assessment of both quantum options. It does not include an option for development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. We consider this a sensible approach given that TMBC are not willing to</p>	<p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>The SA does not conclude that both growth scenarios would result in a negligible impact on economic growth. Quantum Option 1 receives a significant positive effect in relation to SA objective 4, whilst Quantum Option 2 receives a mixed minor positive and minor negative effect. The reasons for this are outlined in paragraph 4.34 of the Interim SA Report.</p> <p>With regard to SA objective 2: service and facilities, site 59845 receives a minor negative effect in relation to this objective as it falls</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>consider a lower housing target. A summary of the SA findings is included below:</p> <p>3.38 While we broadly agree with the SA's assessment of the different quantum options, it fails to recognise the significant benefits of delivering Option B. The SA concludes that Option B would result in 'mixed minor effects' for objective 1,2 and 3 while Option A would result in 'Minor Positive Effects'. We disagree with this. As set out above, a higher growth scenario would ensure homes are allocated in sustainable locations across the Borough mitigating against speculative applications coming forward which may result in unsustainable growth patterns. Both options should show 'Significant Positive Effects' against these objectives.</p> <p>3.39 The assessment also concludes that both growth scenarios would result in negligible impact on the economic growth. We strongly disagree with this conclusion. Housing development will create jobs during the construction phase. It will provide additional residential expenditure in the local economy, additional s106 payments to support local infrastructure, and more spending power in the local area to enhance the vitality and viability of local service. Furthermore, providing family homes in the Borough will help attract and retain the local workforce strengthening the local economy. These objectives should be show 'Significant Positive Effects' in both growth scenarios.</p> <p>Q.8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>3.40 Appendix D of the Interim SA sets out the fourteen Sustainability Objectives. While we generally support the objectives. However, it is important to note that the assessment is generic for across the Borough. Setting over-arching targets fails to accurately reflect the potential of each specific site.</p> <p>3.41 These representations relate specifically to land off Tonbridge Road (ref: 59845). The table below sets out the SA's conclusions alongside a column which is a more accurate reflection of the site.</p> <p>3.47 We do not support the SA assessment and would support a more detailed and accurate review of each site's sustainability merits.</p> <p>3.48 In addition, the report includes a yield of 0 dwellings on the site. This yield is based on the methodology set out in the Urban Capacity Study and is based on the site's accessibility. To determine overall accessibility of a site, a scoring matrix was applied to each of the elements of accessibility considering accessibility to the following services:</p> <ul style="list-style-type: none"> • Bus Stops • Train Stations • Primary and Secondary Schools • GP • Dentist Pharmacy 	<p>within the Fair Accessibility Band in the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria.</p> <p>With regard to SA objective 3: education, the site receives a minor positive effect as it is within 800m of a primary school. All effects against this objective are recorded as uncertain, as it is unknown whether the schools have capacity to accommodate new pupils or not. Although the respondent states that the site is within 2.5 miles of an allocation to deliver 900 homes along with a primary and secondary school, this is quite a distance and the application is subject to approval.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities in the long-term and not temporarily. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 5: biodiversity and geodiversity, this is a 'policy-off' appraisal and so consideration is not given to mitigation, such as ecological enhancements, provision of a community orchard and wildflower meadow, and biodiversity net gain. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to SA objective 6: landscape and townscape, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The site does, however, incorrectly receive an uncertain significant negative effect in relation to SA objective 6 when it should receive an uncertain minor negative effect. This is due to the fact it is located on the edge of a settlement, and so development can be more easily integrated into existing built development.</p> <p>With regard to SA objective 7: heritage, the site is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, the site correctly receives a significant negative effect in relation to SA objective 7. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>All site options receive a negligible effect in relation to SA objective 11: climate change adaptation, as "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, this is a 'policy-off' appraisal and so consideration is not given to mitigation, such as the</p>

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		<ul style="list-style-type: none"> • Retail • Supermarket • Pub <p>3.49 We agree that development densities should be influenced by a site's accessibility. However, the Urban Capacity Study only considers distances from certain locations rather than how accessible a site genuinely is. For example, the capacity study considers distances from bus stops. However, it does not consider the frequency of buses serving the bus stop or where they run to. Therefore, the methodology cannot fully reflect the accessibility of the site.</p> <p>3.50 Furthermore, the identified yield does not consider the site-specific characteristics. The assessment does not factor in topography, ecology, landscape, heritage or neighbouring uses. These will all have an impact on the potential yield of a site. As a result, a number of site's have been identified to deliver a high yield of development due to their accessibility credentials when in reality, the site cannot deliver such a high yield without resulting in harm.</p> <p>3.51 We are of the view that the site capacity fails to accurately reflect the true potential yield of a site. The current approach results in a misleading indication of the scale of development that can come forward in certain locations. Instead, TMBC should be working with landowners and developers on a site-by-site basis to understand the true potential of a development site.</p>	<p>incorporation of junction capacity improvements. Therefore, the effect against SA objective 12 remains as it is.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". As site 59845 will deliver fewer than 100 new dwellings (not 0), it receives a minor positive effect.</p> <p>The respondent agrees with the effects recorded against SA objectives 1: health and wellbeing, 8: water, 9: soil, 10: climate change mitigation and 13: material assets and waste.</p> <p>The Urban Capacity Study does take into consideration bus service frequency, please refer to paragraph 53 of the document.</p>
25240641	Q7 of the questionnaire	<p>1.2.25 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.26 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.27 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.28 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
45864993	Q7 of the questionnaire	<p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>4.1.32 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>4.1.33 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>4.1.34 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>4.1.35 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner.</p> <p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>4.1.36 In respect of this question, our client only wishes to comment upon Oast Park Golf Club, which is assigned site reference '59840' within the Sustainability Appraisal report.</p> <p>4.1.37 Upon reviewing the findings of the Sustainability Appraisal report, we are concerned that the report significantly underplays the accessibility of the site and its existing relationship with the Snodland urban area and without basis, identifies high levels of landscape and heritage harm without regard to the scale of the development proposed. Finally, the report seemingly attributes very little positive impact to the delivery of up to 800no. new homes and thus the report has the effect of appearing heavily skewed against the delivery of new housing.</p> <p>4.1.38 Considering the report's site assessment for Oast Park in detail, we note that under SA Objective 1, the report references the sites good accessibility to healthcare and/or open space, but attributes a significant negative to the loss of an existing sports facility. In this regard, the report fails to consider the present disused state of the golf course which has ceased operating as a golf course for a number of years. By contrast, the proposed development is capable of providing high-quality sport and leisure facilities on site which has not</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022). As site 59840 falls within the 'Fair Accessibility Band', it receives a minor negative effect in relation to SA objective 2. This is in accordance with the site assessment criteria.</p> <p>The site is incorrectly recorded as not located near any settlements in rural locations. However, the site still receives an uncertain significant negative effect in relation to SA objective 5: landscape and townscape, due to its location in the AONB.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p> <p>Site 59840 is incorrectly recorded as receiving an uncertain minor positive effect in relation to SA objective 14 when it should receive an uncertain significant positive effect. In the next iteration of the SA, the proforma for the site will be updated to reflect this.</p> <p>The quality of existing open spaces is not considered in the SA, and this includes the space comprising this site. Therefore, the site correctly receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing.</p> <p>The site correctly receives uncertain significant negative effects in relation to SA objectives 5: biodiversity and geodiversity and 6: landscape and townscape. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. ecological enhancements). This ensures all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via policy outlining mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA utilises a precautionary approach and therefore if a site is located within close proximity of a heritage asset (as recorded in the Kent Historic Environment Record), it has the potential to result in a significant negative effect. All effects against SA objective 7: heritage are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>been factored into the assessment and would correctly result in a net positive.</p> <p>4.1.39 The site is logically located close to the urban area of Snodland with good onward access to larger settlements. The report considers the site to have a fair accessibility 'minor negative' to community facilities and services. Given the rural nature of the majority of the borough, we would suggest that in context, the site has a good accessibility level and should be considered a minor positive.</p> <p>4.1.40 SA Objective 5 relates to biodiversity and identifies the site to be within 250m of a designated ecological site and to form an existing green infrastructure asset which could be lost. The report concludes this to result in a uncertain significant negative. However, the report fails to consider the inherently managed state of the golf course, which undoubtedly reduces the ecological potential of the site and fails to consider the potential for significant ecological enhancement as part of the proposed development. Indeed the report notes that it may be possible to conserve or even enhance the asset through the design and layout of the new development, yet still concludes a significant negative.</p> <p>4.1.41 Similarly, SA Objective 6 relates to townscapes and landscapes and whilst acknowledging that the effects will depend on the design, scale and layout of development, which may help mitigate any adverse effects, still identifies a uncertain significant negative. Notwithstanding our view that this assumption is premature, the site is characterised by its managed former golf course state and is already appreciated in an edge-of-settlement context.</p> <p>4.1.42 SA Objective 7 relates to heritage assets and identifies a heritage asset within 250m of the site and concludes an uncertain significant negative. However, the report concedes that effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. In this regard, the presence of a single asset, which itself is confirmed to be visually and spatially unrelated to the site does not in our view amount to a significant negative and fails to have any regard to the relative scale of development proposed.</p> <p>4.1.43 Finally, with respect to SA Objective 14 which concerns housing delivery, we fail to understand how the delivery of up to 800no. new homes comprising a mix of dwelling sizes, types and tenures attracts only an uncertain minor positive. Consequently, when read alongside the preceding objectives, which place significant individual weight on landscape, ecological and heritage assets without regard to the relative scale of development proposed, the report appears heavily skewed against the delivery of new housing.</p>	
45875041	Q7 of the questionnaire	Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.	SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.

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		<p>1.2.25 No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However, in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>1.2.26 Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1.</p> <p>1.2.27 The same principle applies with provision of new essential services and education and training facilities with a assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>1.2.28 In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Without a credible and more balanced assessment it represents an unsound assessment upon which to base future decisions.</p> <p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.29 In respect of this question, our client only wishes to comment upon the site they are promoting.</p> <p>1.2.30 We support the double positive that will be achieved in respect of the provision of new job opportunities (Objective 4) and in particular we would reiterate that a shortfall of 147,550 sq.m light/general industrial and storage and distribution requirements across the period 2021-40, which our client's land has a role in helping to address.</p> <p>1.2.31 However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.32 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. Provision of employment uses with dedicated species rich features would result in substantial betterment and this should represent a strong positive.</p> <p>1.2.33 The Council have assessed the site as Negative against SA8 objective 8 when it is not in Flood zone nor % at risk for surface flood.</p> <p>1.2.34 Based on a human judgement it is clear that there are not any significant heritage, environmental or landscape constraints to development and that the impacts are likely to be neutral or positive. Furthermore, the land is well related to the established employment hub of Wrotham.</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, site 59680 receives a significant negative effect, as it is within 250m of ancient woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>The site receives an uncertain minor negative effect in relation to SA objective 8: water, as it contains land with a 1 in 100 year risk of surface water flooding. This is in accordance with the site assessment criteria.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it is partially within the AOND. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effect.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage, biodiversity/geodiversity and landscape constraints in more detail.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		1.2.35 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.	
44546401	Q7 of the questionnaire	<p>Questions 7</p> <p>Kitewood's site to the west of Hays Road in Snodland is identified as site no. 59874 in the list of sites at Table 9 of the Tonbridge and Malling Borough Local Plan Regulation 18 Draft. The site is accessible by car, being located close to the junction of Hays Road and Malling Road. It is also accessible by public transport (by bus, by train) and by pedestrians and cyclists. The site is close to existing employment opportunities and also lies adjacent to residential uses on the opposite side of Hays Road. www.carneysweeney.co.uk</p> <p>The new occupiers of development on the site would benefit from existing social infrastructure and services in Snodland. Contributions are also able to be made to expand any of this infrastructure, as appropriate. The site study document that is submitted with this response to the Regulation 18 consultation shows the physical features on and immediately adjoining the site. From this, it is clear that development can be provided on the site outside Flood Zone 3 (which is to the south), without impact on the AONB (the site is well screened from the wider landscape) and can provide biodiversity improvements on the undeveloped areas of and boundaries to the site.</p> <p>The site is no longer farmed and no important agricultural land would be lost upon the site's development. The site is currently used for grazing horses and is therefore likely to have low ecological value. If the site contains a viable quantity of minerals, these could be extracted as part of the development process, and therefore is not a reason for the site being left undeveloped or to restrict its allocation. Indeed, extraction prior to development is acceptable within the Council's previously adopted Policy DM5 on mineral resources.</p> <p>The site can provide a range of housing types, mix and tenures together with employment use, in order to deliver a truly inclusive mixed development.</p> <p>The fact that the site can deliver both employment and housing development is also an important sustainability factor, that should be taken account to in the sustainability appraisal. As a result of the above, Kitewood's site at Snodland performs very well from a sustainability perspective.</p>	<p>Site 59874 has been appraised in line with the site assessment criteria, as outlined in Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>The site has been appraised on a 'policy-off' basis and so consideration is not given mitigation (e.g. financial contributions). Documents submitted by site promoters are not considered in the SA, so as to ensure all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>
43619329	Q7 of the questionnaire	<p>[59647]</p> <p>Q7 Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>No. The SA Assessment seems to be based on unevidenced assumptions. For example, the SA tests option 1 (meeting development needs) and option 2 (meeting development needs plus 10%). A minor positive effect is identified for both Option 1 and Option 2 in relation to SA objective 1: health and wellbeing. However,</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>The assessed need + 10% was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on. An even higher growth scenario of assessed need + 20% would not yield particularly different SA effects to Quantum Option 2, as both options are relatively similar and so it</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>in the case of Option 2, a minor negative effect is also identified as it is deemed that delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded.</p> <p>Such a conclusion is clearly without reason. There is no basis to suggest that additional growth would stretch existing healthcare capacity more than option 1. To the contrary, it could just as easily be the case that the extra development will deliver new and upgraded facilities that are not achievable under option 1. This is particularly the case at Court Lane, Hadlow, which has potential to provide a new medical centre for Hadlow and the surrounding area. The development would be mitigating its impact, whilst allowing for greater and improved provision for the existing community.</p> <p>The same principle applies with provision of new essential services and education and training facilities with an assumption that more growth will overwhelm rather than help provide improved education facilities.</p> <p>In our view the SA looks unreasonably negatively on growth rather than looking in an impartial manner. Indeed, it is Rydon's firm belief that TMBC should be adding a 20% buffer to the Local Housing Need requirement. This is for a number of reasons which are relevant to TMBC, not least the inherent lack of housing affordability in the borough.</p> <p>MBC's past performance particularly in relation to Housing Land Supply and the 2021 Housing Delivery Test measurement, which equated to 63%, provide a clear reason to provide a 20% buffer to the Local Housing Need. This would lead to an annual housing requirement of 1,007 dpa, and a housing requirement at this level would significantly improve the affordability situation within the Borough and would deliver more affordable homes for those members of the community in the most need. This should be tested through the SA.</p> <p>Q8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>No. Again, the SA is based on unevidenced assumptions partly due to the fact that TMBC have elected to proceed with this Regulation 18 consultation and accompanying SA in advance of the publication of the SHLAA. In respect of the site at land to the north of Court Lane, Hadlow (ref 59647), we wish to make the following observations.</p> <p>SA Objective 2</p> <p>With regard to the site's accessibility (SA Objective 2) we welcome the conclusion that the site falls within the Good Accessibility Band however it is not at all clear how this conclusion has been arrived at. Paragraph 5.6 states that each site's overall accessibility score has been determined by applying a scoring matrix to each element of accessibility, however this matrix does not appear to have been published. It is therefore impossible to be able to review and confirm</p>	<p>would be difficult to distinguish between the effects each is likely to have.</p> <p>As stated in paragraph 2.27 of the Interim SA Report, "Reasonable alternative options for the residential, employment and mixed use sites to be allocated in the Local Plan have been identified by TMBC. These sites were identified via a call-for sites exercise and an Urban Capacity Study. In addition, allocations from the withdrawn Local Plan which were not submitted during the call-for-sites exercise and were not identified in the Urban Capacity Study have been identified in the pool of reasonable alternative options."</p> <p>Site 59647 receives a negligible effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Good Accessibility Band. As outlined in paragraph D.3 of the Interim SA Report, "Sites have been assessed by TMBC for accessibility to local services (including transport infrastructure, education facilities, healthcare facilities and essential services) using accessible walking distances informed, in part, by guidance such as Planning for Walking [See reference 53]. Sites have also been assessed on their location, with sites within settlements placing higher in the settlement hierarchy being considered more accessible. Sites have then been given an overall accessibility score, and placed in to one of the following bands outlined in Table D.1 below". Sites that fall within the Very Good Accessibility Band receive minor positive effects against this objective whereas sites that fall within the Good Accessibility Band receive negligible effects.</p> <p>Site 59647 receives an uncertain minor negative effect in relation to SA objective 5: biodiversity and geodiversity as it is within 250m and 1km of Ancient Woodland. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. biodiversity net gain). This ensures all sites are appraised to a consistent level of detail.</p> <p>With regard to SA objectives 6: landscape and townscape and 7: heritage, consideration is not given to supporting documents submitted by site promoters. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, as the site is greenfield and contains Grade 2 agricultural land, it receives a significant negative effect in relation to this objective.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>whether the scoring is fair or indeed whether it has been informed by accurate factual information or not. The Council already confirms in relation to SA Objective 1 that this site is accessible to certain key facilities. This score should therefore be amended to Positive (+)</p> <p>SA Objective 5</p> <p>The SA states that:</p> <p>“The site is between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or is within 250m of a locally designated site.”</p> <p>There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest statutory designated site is Bourne Alder Carr Site of Special Scientific Interest (SSSI) located approximately 5.2km northwest of the site boundary.</p> <p>There are no non-statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest non-statutory designated site is Hazel Wood and Paddling Brook Shaw, West Peckham Local Wildlife Site (LWS) located approximately 1.6km northeast of the site boundary (see Plan ECO1).</p> <p>This raises significant concern about the accuracy of the evidence which underpins the SA, and the resultant Uncertain Minor Negative score given against SA Objective 5 in respect of this site.</p> <p>The land is currently of little or no ecological value and would be able to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment and this should represent a positive grading.</p> <p>SA Objective 6</p> <p>The SA grades the site as “Uncertain minor negative” in respect of SA Objective 6 which is to protect and enhance the borough’s landscape and townscape character and quality. It is stated that these effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scape and layout of the development, which may help mitigate any adverse effects.</p> <p>Rydon have commissioned evidence in respect of landscape and visual impact, to help inform TMBC’s Sustainability Appraisal and Local Plan evidence base. A Landscape & Visual Technical Note prepared by Liz Lake Associates can be found at Appendix 2. This finds that in visual terms, the extended development will only be visible from a very limited number of locations, mainly the public footpath MT125 running past the north east of the Site and from Hadlow Tower in the south west.</p> <p>It is considered that a proportionate release of Green Belt land to the north of Court Lane, Hadlow can take place without harming the purposes or functions of the Green Belt in this area.</p> <p>Given the availability of this new landscape evidence, the site should be considered to provide the opportunity for residential development</p>	<p>services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>from a landscape and visual perspective. The site's grading in respect of SA Objective 6 should be revised to neutral.</p> <p>SA Objective 7</p> <p>The SA states that</p> <p>"The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets."</p> <p>The site is graded as Uncertain Significant Negative in respect of this objective. However, Rydon have commissioned Orion Heritage to consider the possible effects that the proposed development of the site may have on the designated and non-designated heritage assets within the vicinity of the site. This new evidence provides the necessary certainty with respect to the effects of the development on heritage assets, in particular with regard to lines of sight. Orion have identified the following heritage assets, and have made the following observations in respect of effects:</p> <p>Hadlow Tower, Grade I Listed Building</p> <p>The Grade I listed Hadlow Tower sits 300m to the south west of the site. Intervisibility is shared from within the site, however, in its current form the Listed Building and the study site share limited to no co-visibility due to intervening natural screening and built form when approaching the asset along surrounding roads. The site in its current form is considered to make a limited contribution to the Tower's overall significance, which largely relates to its architectural and historic special interest.</p> <p>Church of St Mary, Grade II* Listed Building</p> <p>The Church of St Mary is located c.200m to the south west of the site. There is no visual connection between the site and the Church at ground level, and it is the immediate environs which form the setting of the Church. The site is considered to make a negligible contribution to the wider setting and a limited contribution to the significance of the Church.</p> <p>The Terrace, Grade II Listed Building</p> <p>The Terrace is a Grade II Listed Building which falls 65m to the south west of the site. Its setting relates to its position within the streetscape of Tonbridge Road. The site is considered to make a neutral contribution to the setting and no contribution to the significance of the Listed Building.</p> <p>Conservation Areas</p> <p>Two Conservation Areas sit within a 1km radius of the site. There is no intervisibility between the site the Freehold Conservation Area, and development of the site is not considered to have any potential to affect its character or appearance.</p> <p>The Hadlow Conservation Area is located immediately adjacent to the site. Due to the curvature of the roads and the close-knit built form,</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>the Conservation Area has an enclosed feel with limited views to the wider landscape. Many of the key views and vistas are inward looking, to key landmark buildings. There is only a limited visual connection between the site and the Conservation Area, restricted to glimpsed views through spaces between buildings. The site is therefore considered to make only a limited contribution to the character and appearance of the Conservation Area.</p> <p>Given the above conclusions, it is clear that whilst there are designated heritage assets within the site's vicinity, there is very limited visual connectivity. The site makes only a limited contribution to the setting of designated heritage assets, and given the availability of the evidence, TMBC can now conclude with certainty in respect of cultural heritage, and the site's grading in this respect should be changed to Negligible. Orion's report is attached to these representations at Appendix 1.</p> <p>SA Objective 8</p> <p>Rydon's Flooding and Drainage Engineers Stuart Michael Associates have prepared a Technical Note which directly addresses the SA's statement that the "site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area" and the resultant Significant Negative/ Negligible score against SA Objective 8. The Technical Note is appended to these representations at Appendix 3, and highlights that the site lies wholly within Flood Zone 1 according to the UK Government Flood Map for Planning and is therefore at low risk of fluvial flooding. The nearest flood plain is located approximately 500m southwest of the site and is associated with the River Bourne. The Technical Note finds that the site:</p> <p>"is not significantly within an area at risk of flooding from either fluvial or surface water site. Mapping indicates the site is not located within a Groundwater Source Protection Zone and that there are no watercourses on the site or in close proximity to the Site."</p> <p>The site's score in terms of SA Objective 8 must be revised to Negligible.</p> <p>SA Objective 9</p> <p>It is stated that the site contains a significant proportion of Grade 1 or Grade 2 agricultural land, however this is not evidenced. The site's farmers state that only limited crops can grow on the land, and as such Rydon will commission an Agricultural Land Value assessment to inform subsequent evidence. At this stage, there is significant uncertainty and this must be reflected in the assessment.</p> <p>SA Objective 10</p> <p>The site is very well related to a very sustainable settlement. As such there is no reason why the site should be graded as only a Minor Positive, and this should be changed to Significant Positive.</p> <p>Overall, we have significant concerns with the SA. The desktop nature of the site assessment is of concern. Based on a human judgement it</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>is clear that there are not any significant constraints to development and that the impacts are likely to be neutral or positive.</p> <p>In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information. On this basis, we have prepared a revised SA for the site as below:</p> <p>[Insert copy of SA scoring]</p> <p>Q9. Do you agree with this set of strategic matters? Yes/No. Please explain</p> <p>The Council has have identified the following strategic matters that need to be addressed within the plan; Housing, Economic Development, Transport, Tonbridge (as the borough's principal town centre), Retail, Community facilities and infrastructure, Natural Environment, Built and Historic Environment, Green Belt and Climate Change.</p> <p>Whilst we recognise that these topics are relevant to the plan, not all need be of a strategic nature. Para 20 of the NPPF states that strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for:</p> <p>(a) housing (including affordable housing), employment, retail, leisure and other commercial development;</p> <p>(b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</p> <p>(c) community facilities (such as health, education and cultural infrastructure); and</p> <p>(d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</p> <p>In line with the Framework, strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.</p> <p>With the above in mind, the plan should be more focussed on the strategic policies that it is proposing to introduce.</p> <p>Q.10. Which strategic matters should be priorities in the Local Plan? And</p> <p>Q.11. What are your reasons for selecting these particular strategic matters as priorities for the Local Plan (outline briefly)?</p> <p>As outlined above, the NPPF sets clear parameters for what constitute strategic policies and what should feature in a plan. Given there is</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>clarity on these matters we question the benefit in implying that there is an element of choice of which matters take priority.</p> <p>Q.12. Do you agree that the housing requirement for the Local Plan should involve meeting the identified housing needs in full, as a minimum?</p> <p>In addition to the spatial distribution of development across the borough, the Council is seeking input on the quantum of development that is accommodated, namely whether to plan for the full housing need of the area, or to plan for full need plus 10% for flexibility to be built into the strategy.</p> <p>By way of simple response, there is a clear need to ensure development requirements are met in full and that any future plan is sufficiently flexible in the face of what could be a difficult economic period.</p> <p>As emphasised within the plan, one of the Government's key objectives for planning is to significantly boost the supply of homes. This includes not just market housing but also housing to meet the needs of different groups in society. The gross need for housing (2021-2040) is stated to be 9,245 dwellings based on an annual delivery rate of 839 pa.</p> <p>Such delivery requires a step change in how the borough is planning for housing.</p> <p>In addition to the overall housing need, the plan also acknowledges that housing affordability is a significant issue that is worsening beyond that of the county, region and national level. Accordingly affordable housing provision must be a strategic priority with the need for close to 300 affordable dwellings per annum.</p> <p>In our view, the delivery of a higher number of homes will have the greatest impact on combatting the affordability constraints.</p> <p>Q.13. Do you agree that the Local Plan should allocate a mix of sites (small, medium, and large) to help maintain supply throughout the plan period?</p> <p>Yes. Paragraph 69 of the NPPF explicitly acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should accommodate at least 10% of their housing requirement on sites no larger than one hectare and support the development of windfall sites through their policies and decisions.</p> <p>We also consider the need to recognise the importance of SME developers. The support for SMEs is recognised within Central Government and significant weight and reliance is being placed upon them to help deliver and achieve the 300,000 dwellings per annum housing target. In particular SMEs think differently and act differently to volume housebuilders, including the ability to deliver bespoke designs reflecting the local area and deliver quickly. do not also land</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>bank and deliver quickly and so it is important that this is fully understood when selecting sites.</p> <p>Q.14. Do you agree that the Local Plan should require a specified mix of dwelling types (eg flatted, terraced, semi-detached, detached) on large development sites to meet the range of households' needs? Yes/No Please explain</p> <p>Yes. There is great emphasis on the need to deliver mixed and balanced communities throughout the framework</p> <p>Q.15. Do you agree that the Local Plan should require a proportion of plots on large developments to be made available for self-build and custom house building? Yes/No Please explain</p> <p>No. The Council should address self build need within the plan and potentially allocate suitable sites for self build development. However, the practicalities of delivering self builds as part of a larger scheme is complex and faces a number of design and infrastructure constraints.</p> <p>Q.16. Do you agree that the Local Plan should require a proportion of homes on large development sites to be Build-to-Rent products? Yes/No Please explain</p> <p>No. The Council should address build-to-rent need within the plan and potentially allocate suitable sites for build-to-rent development. However, the practicalities of delivering build-to-rent products as part of a larger scheme is complex and faces a number of design and infrastructure constraints. These should therefore only be pursued where there is a willingness on the part of the developer.</p> <p>Q17 Do you agree with the windfall allowance methodology?</p> <p>We support a modest windfall allowance to reflect that some unplanned sites will continue to be delivered. However, as part of the plan making process there is a requirement to consider, identify and maximise a range of sites before proceeding to any greenfield or Green Belt land releases.</p> <p>Owing to the onerous nature of these tests, it is likely that more sites will be identified and more land exhausted than has previously been the case. Accordingly, we question the extent to which past trends will represent a sound basis for future expectations.</p> <p>The above in mind, any windfall allowance should be conservative rather than overly optimistic.</p> <p>Q.18. Which housing matters are most important to you?</p> <p>As outlined above, there is a need to plan for full housing needs. Given there is clarity on these matters we question the benefit in implying that there is an element of choice of which types of housing take priority.</p> <p>Green Belt</p> <p>Q.40. Do you agree that there are exceptional circumstances, at the strategic level, for altering Green Belt boundaries (in principle) to help address assessed development needs?</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Yes. We acknowledge that before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Council must demonstrate that it has examined all other reasonable options making as much use as possible of suitable brownfield sites and underutilised land; optimising the density of development and informed by discussions with neighbouring authorities. However, these exercises were carried out in detail as part of the previous Local Plan work and evidence established that Green Belt release is needed. Since this time, annual housing requirements have increased significantly.</p> <p>Notwithstanding the earlier decisions and evidence, housing and employment needs remain a core part of why exceptional circumstance exist to justify a review of Green Belt boundaries.</p> <p>Case law, (Calverton Parish Council v Nottingham City Council, Broxtowe Borough Council and Gedling Borough Council [2015] EWHC 1078 (Admin)) also provide guidelines for determining whether exceptional circumstances exist. The above judgement states:</p> <p>‘planning judgments involved in the ascertainment of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) should, at least ideally, identify and then grapple with the following matters:</p> <p>(i) the acuteness/intensity of the objectively assessed need (matters of degree may be important);</p> <p>(ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development;</p> <p>(iii) (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;</p> <p>(iv) the nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and</p> <p>(v) the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent’.</p> <p>Considering these parameters in turn, the acuteness of the local and economic housing need is clear in the need to deliver 15,941 new homes and 296,260 sq.m (69.8ha) of employment provision in the plan period. Furthermore, the Council's Green Belt Assessment prepared by Arup also confirms that TMBC does have a good strategic exceptional circumstances case for altering the Green Belt boundaries to help meet the assessed development needs.</p> <p>Q.41. Do you agree with that the set of factors listed in para. 5.11.7 should be used to determine if exceptional circumstances exist to justify alterations to Green Belt boundaries? Yes/No. If no, please explain, highlighting additional/alternative factors that you consider need to be included in the review process.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The plan highlights a set of factors that need to be taken into account when reviewing the existing Green Belt boundaries to determine if exceptional circumstances exist to justify local alterations. These are:</p> <ul style="list-style-type: none"> (a) National policy (purposes of the designation and the need to promote sustainable patterns of development; (b) Case law (c) Housing Market Areas (d) Housing affordability (e) Policy and environmental constraints (f) Assessed development needs (g) Housing supply (h) The potential for development in the built-up areas (Urban Capacity Study). <p>Fundamentally we agree that all of these matters should be taken into account when making a judgement about the locations for Green Belt release. The most obvious omission is delivery. In respect of making a judgement on site allocations, it is imperative that the plan includes a range of deliverable sites. Whilst it is recognised that the Council must assess potential for development in the built-up areas, the reality is that many of these will come forward for development without plan led intervention. Those that have consistently delayed are often not forthcoming because of viability or wider ownership constraints. It is therefore essential that deliverability is a core component when considering options.</p>	
42819617	Q7 of the questionnaire	<p>Q.7. Do you agree with the findings of the strategic policy options assessments in Chapter 4 of the Interim Sustainability Appraisal Report? Yes/No Please specify the option and explain.</p> <p>3.26 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to Sustainability Appraisal to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. We generally support the overall scope and methodology set out in the SA. However, we are of the view that it fails to assess the impact of the differing scenarios accurately.</p> <p>3.27 The SA includes an assessment of both quantum options. It does not include an option for development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. We consider this a sensible approach given that TMBC are not willing to consider a lower housing target. A summary of the SA findings is included below:</p> <p>Table 3.1 Summary of SA's Findings</p> <p>3.28 While we broadly agree with the SA's assessment of the different quantum options, it fails to recognise the significant benefits of delivering Option B. The SA concludes that Option B would result in</p>	<p>Delivering growth beyond the assessed housing need (Quantum Option 2) could result in some capacity issues, whilst also stimulating the provision of new services and facilities. For this reason, Option 2 is expected to have mixed minor positive and uncertain minor negative effects in relation to SA objectives 1: health and wellbeing, 2: services and facilities and 3: education.</p> <p>The SA does not conclude that both growth scenarios would result in a negligible impact on economic growth. Quantum Option 1 receives a significant positive effect in relation to SA objective 4, whilst Quantum Option 2 receives a mixed minor positive and minor negative effect. The reasons for this are outlined in paragraph 4.34 of the Interim SA Report.</p> <p>With regard to SA objective 2: service and facilities, site 59843 receives a negligible effect in relation to this objective as it falls within the Good Accessibility Band in the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria.</p> <p>With regard to SA objective 3: education, the site receives a minor positive effect as it is within 800m of a primary school. All effects against this objective are recorded as uncertain, as it is unknown whether the schools have capacity to accommodate new pupils or not. Although the respondent states that any proposal will include</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>'mixed minor effects' for objective 1,2 and 3 while Option A would result in 'Minor Positive Effects'. We disagree with this. As set out above, a higher growth scenario would ensure homes are allocated in sustainable locations across the Borough mitigating against speculative applications coming forward which may result in unsustainable growth patterns. Both options should show Significant Positive Effects against these objectives.</p> <p>3.29 The assessment also concludes that both growth scenarios would result in negligible impact on the economic growth. We strongly disagree with this conclusion. Housing development will create jobs during the construction phase. It will provide additional residential expenditure in the local economy, additional s106 payments to support local infrastructure, and more spending power in the local area to enhance the vitality and viability of local service. Furthermore, providing family homes in the Borough will help attract and retain the local workforce strengthening the local economy. These objectives should be show Significant Positive Effects in both growth scenarios.</p> <p>Q.8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>3.30 Appendix D of the Interim SA sets out the fourteen Sustainability Objectives. While we generally support the objectives. However, it is important to note that the assessment is generic for across the borough. Setting over-arching targets fails to accurately reflect the potential of each specific site.</p> <p>3.31 These representations relate specifically to land off Crouch Lane (ref: 59843). The table below sets out the SA's conclusions alongside a column which is a more accurate reflection of the site.</p> <p>Table 3.2 Sustainability Assessment Critique SA Objective TMBC's Assessment Applicant's Assessment</p> <p>3.36 We do not support the SA assessment and would support a more detailed and accurate review of each site's sustainability merits.</p> <p>3.37 In addition, the report includes a yield of 76 dwellings on the site. This yield is based on the methodology set out in the Urban Capacity Study and is based on the site's accessibility. To determine overall accessibility of a site, a scoring matrix was applied to each of the elements of accessibility considering accessibility to the following services:</p> <ul style="list-style-type: none"> • Bus Stops • Train Stations • Primary and Secondary Schools • GP • Dentist Pharmacy • Retail • Supermarket 	<p>developer contributions ensuring there is sufficient capacity to support growth, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. financial contributions). If the site is allocated in the Local Plan via a policy, it will be appraised on a 'policy-on' basis. The same applies to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape,</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities in the long-term and not temporarily. The SA correctly acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities".</p> <p>With regard to SA objective 7: heritage, the site is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, the site correctly receives a significant negative effect in relation to SA objective 7. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives a minor negative effect as it is within Source Protection Zones 2 and 3. The effect is recorded as uncertain, as it is unknown at this stage what effects development might have on water quality.</p> <p>With regard to SA objective 9: soil, the site correctly receives an uncertain significant negative effect. Although the respondent states that the harm caused by the loss of agricultural land will be outweighed by the benefits of the scheme and that the effect should be upgraded and uncertainty removed, SA objective 9 relates solely to agricultural land and whether the site is previously developed or not, rather than the overall scheme. The effect should remain as it is.</p> <p>All site options receive a negligible effect in relation to SA objective 11: climate change adaptation, as "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 13: material assets and waste, the justification text for the minor negative effect explains that the effect is uncertain at it will largely depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction. Although the site promoter states that they understand the site to have no realistic prospect of being worked for minerals in the long term, this is not certain. Additionally, this level of information is not available for most of the sites. So as to ensure consistency, all sites within a Minerals Safeguarding Area are recorded as having an uncertain minor negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>• Pub</p> <p>3.38 We agree that development densities should be influenced by a site's accessibility. However, the Urban Capacity Study only considers distances from certain locations rather than how accessible a site genuinely is. For example, the capacity study considers distances from bus stops. However, it does not consider the frequency of buses serving the bus stop or where they run to. Therefore, the methodology cannot fully reflect the accessibility of the site.</p> <p>Furthermore, the identified yield does not consider the site-specific characteristics. The assessment does not factor in topography, ecology, landscape, heritage or neighbouring uses. These will all have an impact on the potential yield of a site. As a result, a number of site's have been identified to deliver a high yield of development due to their accessibility credentials when in reality, the site cannot deliver such a high yield without resulting in harm.</p> <p>3.39 We are of the view that the site capacity fails to accurately reflect the true potential yield of a site. The current approach results in a misleading indication of the scale of development that can come forward in certain locations. Instead, TMBC should be working with landowners and developers on a site-by-site basis to understand the true potential of a development site.</p>	<p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". As site 59843 will deliver fewer than 100 new dwellings, it receives a minor positive effect.</p> <p>The respondent agrees with the effects recorded against SA objectives 1: health and wellbeing, 10: climate change mitigation and 12: air quality.</p> <p>The Urban Capacity Study does take into consideration bus service frequency, please refer to paragraph 53 of the document.</p>
25240641	Q8 of the questionnaire	<p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.29 In respect of this question, our client only wishes to comment upon the site they are promoting.</p> <p>1.2.30 We support the double positive that will be achieved in respect of the provision of new job opportunities (Objective 4) and in particular we would reiterate that a shortfall of 147,550 sq.m light/general industrial and storage and distribution requirements across the period 2021-40, which our client's land has a role in helping to address.</p> <p>1.2.31 However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.32 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The current use is a commercially farmed orchard of limited value, so provision of employment uses with dedicated species rich features would result in substantial betterment and this should represent a strong positive.</p> <p>1.2.33 The Council have assessed the site as Significant Negative against SA8 objective 8 when only 1% in Flood zone and less than 1% at risk for surface flood. In order to clarify flood risk a high level FRA is included as Appendix 1.</p> <p>1.2.34 New Access and cycle infrastructure is an integral part of the proposal and any future employees will have many opportunities to access jobs without a reliance on private vehicle. This in turn links in</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59701 is incorrectly recorded as receiving an uncertain significant negative effect when it should receive an uncertain minor negative effect. This is because it is incorrectly recorded as containing a green infrastructure asset, as there is some overlap with an existing green infrastructure asset. In the next iteration of the SA Report, site 59701 will receive an uncertain minor negative effect in relation to SA objective 5.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. This is in accordance with the site assessment criteria. Further to this, the site overlaps a watercourse. The effect is uncertain as it is unknown what effect development might have on water quality.</p> <p>With regard to SA objective 10: climate change mitigation, this is a 'policy-off' effect and so consideration is not given to mitigation, such as provision of cycle infrastructure.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>with SA Objective 10 which seeks to reduce greenhouse gas emissions so as to minimise climate change.</p> <p>1.2.35 Based on a human judgement it is clear that there are not any significant heritage, environmental or landscape constraints to development and that the impacts are likely to be neutral or positive. Furthermore, the land is well related to Tonbridge.</p> <p>1.2.36 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.</p>	<p>whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a minor negative effect in relation to SA objective 6: landscape and townscape, as it is on the edge of a settlement and so development may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effect.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>
25368033	Q8 of the questionnaire	<p>I am writing to you having also completed our formal response to the 'Regulation 18' consultation using the online portal system as is the Council's preferred method of comment.</p> <p>As you are aware, the online system has been designed such that whilst it is possible in some instances to elaborate on answers to questions, a maximum of 6,000 characters can be used in each case (This equates on average to approximately 800 words).</p> <p>Whilst this is sufficient in the main, in the case of the Site Assessment responses (Question 8), it does not enable a full response to be provided.</p> <p>There is similarly no facility to attach plans or drawings which can be necessary to assist in explaining the points being made.</p> <p>Whilst appreciating the reasoning behind the use of the online system, (which we have utilised), I would ask that the Council consider the following additional points in relation to our client's land at Dryland Road, Borough Green (Site Reference 59748) as in many cases the assessment summaries appear either incorrect or uncertain of the effects that would result from its development.</p> <p>We highlight a number of the main areas of concern below.</p> <p>SA Objective 1: To improve human health and well-being</p> <p>1.The Sustainability Appraisal (SA) lists the site as likely to have significant positive effects and also uncertain negative effects. We agree with the positive effects categorisation but not the reference to uncertain negative effects.</p> <p>* Paragraph 5.4 of the SA states that negative effects under this category are likely to relate to sites that contain "an area of open space or accommodate an outdoor sports facility that may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on the exact scale, layout and design of development and whether these existing features are in fact lost to new development."</p> <p>* Our clients site is private land, it does not include any public open space or sports facilities that would be lost through development. The site proposals include the provision of new publicly accessible</p>	<p>The reasoning behind any uncertain effects is provided in Appendix D of the Interim SA Report.</p> <p>Site 59748 receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect), as it contains an existing area of open space. This open space may be lost as a result of development, although this is uncertain. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. open space provision). This ensures all sites are appraised to a consistent level of detail. The SA does acknowledge the fact site 59748 is within close proximity of a GP surgery and open space and for this reason, also receives a significant positive effect in relation to SA objective 1.</p> <p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). As the site falls within the Fair Accessibility Band in the Urban Capacity Study, it receives a minor negative effect in relation to SA objective 2. The straight-line distances the respondent refers to are used to inform SA objectives 1: health and wellbeing and 3: education. The site's access to walking paths is recognised under SA objective 1. The site's proximity to a railway station (and bus stops) is considered under SA 10: climate change mitigation, and schools under SA objective 3.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59748 contains green infrastructure assets. Additionally, it is adjacent to Ancient Woodland (Bourne Valley Woods). In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). Therefore, the site correctly receives an uncertain significant negative effect in relation to SA objective 5. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. biodiversity net gain).</p> <p>Site 59748 is correctly recorded as being within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, the site correctly receives an uncertain significant negative effect in relation to SA objective 7: heritage.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>footpaths and open space which would result in a significant improvement in terms of access to open space in this area. An indicative site plan is included to demonstrate this provision to the south of the built development.</p> <p>* It is noted that site number 59710 (Land near the garden centre at Borough Green Road) has been ranked as a significant positive in terms of improving human health and well-being. The assessment states that this is because the site lies within 800m of an existing healthcare facility and an area of open space/play area/sports facility. Our client site lies close to a bowling club, (50m) and a recreation ground (100m) and within easy walking distance of the Borough Green Medical Centre (260m) but these aspects are not referenced in the text in the same way.</p> <p>* The attached context and facilities plan demonstrated the ease of access to nearby local facilities including the medical centre.</p> <p>* We ask that the reference to uncertain negative effects is therefore removed from the assessment.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>* The site is noted as having 'fair' accessibility to facilities and services. The SA notes that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater."</p> <p>* Given the above there is clearly potential for sites to score well based on a straight line distance whilst in reality, due to inaccessible third party land and the locations of footpaths to key facilities, to perform far more poorly in reality. Our client's site 59748 has the ability to link directly to existing footpaths and so access services directly and easily. The site similarly has the potential to deliver new links across and through it and so improve accessibility for new and existing residents. Please see the indicative site plan attached.</p> <p>* Notwithstanding this, if straight line distances are to be used, the accompanying facilities plan demonstrates that the site lies within a reasonable walking distance of the following:</p> <ul style="list-style-type: none"> * Bowling Green - 50 metres * Sports Ground - 100 metres * Medical centre - 260 metres * Bus Stop - 380 metres * Public House - 400 metres * High Street (Various Shops) - 450 metres * Primary School - 550 metres * Railway Station - 700 metres * Secondary School - 1000 metres 	<p>risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding. Therefore, the site is correctly recorded as receiving a significant negative effect.</p> <p>It is important to note that that SA is one of many factors that feed into the plan-making process.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* The site sustainability credentials were noted as part of the previous 2016 call for sites process where the Council's summary assessment report concluded:</p> <p>"In terms of access to services, this site is in a sustainable location, adjacent to the built-up confines of Borough Green"</p> <p>* The overall assessment was that the site should be categorised as 'green' and so considered "suitable and deliverable".</p> <p>* Given the above we do not agree that the site accessibility should be considered as only 'fair' under this category, it is clearly very well related to shops and facilities and so offers a highly sustainable option for new development.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>* The appraisal assesses the site as having "uncertain significant negative" effects. The associated text states:</p> <p>"The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites.....</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of development. The effect is uncertain as it may be possible to conserve or even enhance the asset through design and layout of the new development."</p> <p>* This is incorrect. The DEFRA 'Magic' Map confirms that the site is approximately 1km away from the Bourne Alder Carr SSSI and over 310m from the Kent Downs AONB. No other sites are highlighted.</p> <p>* The site should be considered to have a neutral impact on this basis not uncertain negative as currently listed.</p> <p>* In terms of the reference to the site containing a "green infrastructure asset", it is noted that the site is all private agricultural land. It is not publicly accessible. Notwithstanding this, as part of the sites development it is proposed to deliver a significant biodiversity net gain. This has been assessed by Corylus Ecology Consultants in this regard. In summary, the whole of the site comprises 7.6834ha with 2.5ha shown as holding potential for development of approximately 45 – 50 new homes directly adjoining the settlement edge. This leaves 5.1516ha of wider land remaining.</p> <p>* It is proposed that 3ha is designated as a biodiversity net gain area to provide 20% net gain for another site within the district. A further area is capable of providing at least 30% biodiversity net gain for the site, along with general amenity open space, footpaths and walking routes as indicated on the accompanying site plan.</p> <p>* This aspect of the assessment should be updated to note the site as having a significant positive effect i.e. delivering a biodiversity net gain well beyond standard policy requirements.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p>	

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		<p>* The SA suggests “uncertain significant negative” effects under this category on the basis that the site lies within 250 metres of a heritage asset.</p> <p>* Having reviewed the heritage mapping system provided by Historic England it is understood that the closet asset is Hunts Farmhouse (grade II) which is approximately 230m away at No.77 Maidstone Road.</p> <p>* There are a number of intervening buildings, the bowls club and a large playing field between the site and this property. It is very clear that development at our client’s site would have absolutely no impact upon the setting of the farmhouse.</p> <p>* This assessment should be amended to confirm that there would be no negative impact and the site should be ranked as at least neutral in this respect.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>* The appraisal highlights the site as falling with a range of from “significant negative to uncertain minor negative effects”.</p> <p>* The text suggests that up to 25% of the site may be located in Flood Zone 3.</p> <p>* This is incorrect.</p> <p>* The flood map for planning (below) demonstrates that Flood Zone 3 only touches the far northern edge of the site. The site itself is not at risk from flooding.</p> <p>* The accompanying plan demonstrates that the development would be retained south of the Flood Zone 3 area.</p> <p>* The assessment should be amended to remove any negative scoring associated with the site in respect of flood risk. This should be a neutral category.</p> <p>[map showing flood zone 3 included]</p> <p>Conclusions</p> <p>* The weight that may be attributed to the site assessment scores which are currently set out in the SA Appraisal when determining potential allocations for the plan period is unclear.</p> <p>* If the site assessments are to form the basis of and the evidence base for these decisions it is respectfully submitted that it is important that they are accurate and fair.</p> <p>* This submission with reference to the accompany plans seeks to ensure that the Council has accurate information regarding our client’s Dryland Road site.</p> <p>* We trust that this will be taken into account and the current inaccuracies corrected as part of the Council’s further assessment of the submitted sites.</p> <p>[site layout and site context documents also included]</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42768289	Q8 of the questionnaire	<p>"Site 59825: Shipbourne primary school has no capacity and therefore SA objective 3 is significant negative not minor positive. Please explain the employment development in SA4: this is not the case.</p> <p>Site 59827: almost every site in Shipbourne would be within 800m of the common; this is already overused with hundreds of cars parked round it on weekends. SA objective 3 has the same point about Shipbourne primary school and is therefore a double negative. nb SA 4 is marked neutral for this site but positive for the site above. Given their proximity this js surprising. There is no "sustainable economic growth" because there is no employment development."</p>	<p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils". Site 59825 receives an uncertain minor positive effect in relation to SA objective 3: education, as it is within 800m of Shipbourne School but it is unknown whether there is capacity at the school to accommodate new pupils or not.</p> <p>Site 59825 was incorrectly appraised as a mixed use site and in the next iteration of the SA Report will be appraised as a residential site.</p> <p>Site 59827 is located within 800m of a number of open spaces, including the common. Therefore, it receives a minor positive effect in relation to SA objective 1: health and wellbeing.</p> <p>Site 59827 has been appraised as a residential site and so it receives a negligible effect in relation to SA objective 4: economic growth. As stated in the proforma for the site "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA, the site assessment criteria will be updated so that if a residential site contains an existing business that could potentially be lost as a result of development, it receives a minor negative effect.</p>
42069697	Q8 of the questionnaire	<p>"Site Identification Number: 59709</p> <p>Berkeley has some concerns with the ISAR scorings given to this site as explained below.</p> <p>SA Objective 2: The outcome of objective 2 is accepted. Berkeley strongly believes that access to community facilities and services will be improved post development of the site. Two primary schools are located less than 1km from the site, in addition to a secondary school being located approximately 1.8km from the land at Dark Hill Farm.</p> <p>SA Objective 5: Berkeley would ask the council to reconsider the assessment of objective 5 (to protect and enhance biodiversity and geodiversity) as uncertain significant negative. The site's definition as a green infrastructure asset is questionable given the limited public access to it. While Berkeley appreciates the site lies within close proximity to a Local Wildlife Site, it is not within 250m of one or more internationally or nationally designated sites. Development will be unlikely to cause disruption to the Local Wildlife Site.</p> <p>Berkeley endeavours to achieve 10% net-biodiversity gain on all projects and the land at Dark Hill Farm is no exception. There is an opportunity as part of the development to retain, enhance and create areas of green space on site and will do so with the upmost respect for the current landscape setting. It is incorrect to assume that development will worsen the surrounding natural environment and not enhance it.</p> <p>SA Objective 6: Berkeley disagrees with regard to scoring the site with an uncertain significant negative for objective 6 – to protect and</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of Bourne Valley Woods Local Wildlife Site and Ancient Woodland. The site also contains existing green infrastructure assets (thick vegetation).</p> <p>Although development of this site offers the opportunity to achieve biodiversity net gain, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is located within the North Downs AONB.</p> <p>With regard to SA objective 7: heritage, the site is recorded as containing Neolithic finds, in addition to falling within 250m of a number of heritage assts. Therefore, it receives a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>enhance the borough's landscape and townscape character and quality.</p> <p>Greater certainty about the impacts of development on the landscape is provided by landscape assessment work undertaken by Murdoch Wickham Associates for Berkeley. The analysis explains that the land comprises paddocks with areas of scrub and derelict farm buildings. The characteristics of the site are not typical of the wooded, traditional farmed landscape associated with the Greensand Ridge within the Kent Downs AONB.</p> <p>Residential development on the western fringes of Borough Green is visible in views to the site and other urbanising influences including traffic noise associated mainly with the A25 and the nearby residential development in the former quarry site to the south west further detract from the site's contribution to the AONB.</p> <p>Overall, the site has a relatively high degree of visual enclosure, in particular the fields north of the footpath, which runs across the centre of the site. The northern hedge provides an effective screen between the site and the A25. There are potential views to the land from the west in the vicinity of Oldbury Hill, but this is a densely wooded area, and no viewpoints were identified.</p> <p>The site does not share the dominant characteristics of the Kent Downs AONB. The site serves a much lower function in comparison to the wider area and the land contributes little to the AONB designation. It is concluded that the development of the Dark Hill Farm site would have a negligible impact on the AONB.</p> <p>SA Objective 7: the scoring the site with an uncertain significant negative for objective 7 due to the site's proximity (being within 250m) to a heritage asset requires further analysis.</p> <p>The site does not contain any designated or non-designated heritage assets. Furthermore, there are no listed buildings directly adjacent to the site. The Borough Green conservation area is located on the eastern side of the town and as such would not be impacted.</p> <p>The site is located approximately 135m from the closest heritage asset in Borough Green, with further Grade II listed buildings, found an additional 20m eastward and still within the urban confines of Borough Green. Ightham Court, a Grade II* listed building (Registered Park and Gardens designation) is located approximately 750m from the site north-westward.</p> <p>There is limited or no intervisibility between the site and the nearby heritage assets. The land at Dark Hill Farm will have a negligible impact on any of the surrounding heritage assets and it is incorrect to score the site with an uncertain significant negative, purely based on proximity.</p> <p>SA Objective 8-- The SA assesses the site, in line with objective 8 criteria, to have a 'significant negative' impact on enhancing the quality of water features and resources. The assessment states the site to be either entirely or significantly (i.e. >25%) within Flood Zone 3</p>	<p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertain significant negative effect is as a result of the site containing land with a 1 in 30 year risk of surface water flooding. Further to this, there is some overlap with a watercourse in the north west of the site and therefore it is uncertain what effect development might have on the watercourse in terms of water quality.</p> <p>With regard to SA objective 9: soils, the site receives an uncertain significant negative effect because it comprises Grade 3 agricultural land but it is unknown whether it is Grade 3a (high quality) or 3b (not classified as high quality) agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>and/or within an area with a 1 in 30-year risk of surface water flooding.</p> <p>While a proportion of the western boundary is part of Flood Zone 3, it is not in excess of 25% of the site. In fact, much less than 25% of the site resides in Flood Zone 3 as this only affects a small area on the western site boundary.</p> <p>Surface water flooding is also determined to affect more than 25% of the site, alongside the land being associated with a 1 in 30-year risk of surface water flooding. It is evident that only a small proportion of the northern parcel is prone to surface water flooding.</p> <p>Surface water flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures (SuDS) within the design proposal.</p> <p>Overall, whilst there is some flood risk on site, which is accepted, this has the potential to be avoided or suitably mitigated. This means that the impact would be negligible.</p> <p>SA Objective 9-- The SA assessment of objective 9 ranks the site as an uncertain significant negative. An agricultural land classification survey will need to be undertaken to determine whether the Option Land is Grade 3a (best and most versatile) or Grade 3b (not best and most versatile). However, either way this should not prejudice the assessment of suitability, as the site is not currently in productive agricultural use and realistically is not of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed."</p>	
42807617	Q8 of the questionnaire	<p>"The above site has been incorrectly assessed against a number of SA objectives.</p> <p>The site has been incorrectly given a Fair Accessibility Band and a minor negative score within the corresponding SA Objective. Based on the methodology within the Urban Capacity Study (p16-17), the below assessment highlights why the site should be ranked within the 'Good' Accessibility Band. Please also refer to Berkeley's covering letter sent under a separate cover for the tabulated assessment.</p> <p>Requirement (Berkeley Assessment of Score)</p> <p>Bus Stop <400m (1)</p> <p>Bus Stop Service Level (Min 0.4 score applied as unknown)</p> <p>Train Station <800m (0)</p> <p>Primary School <800m (1)</p> <p>Secondary School <800m (0)</p> <p>GP <800m (0)</p> <p>Dentist <800m (0)</p> <p>Pharmacy <800m (0)</p> <p>Convenience Retail <800m (0.5)</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, although 43.5% of site 59808 falls within the 'Good' accessibility band, the remainder of the site falls within the 'Fair' accessibility band. As SA utilises a precautionary approach, the site is recorded as falling within the 'Fair' accessibility band and therefore receives a minor negative effect in relation to SA2.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site has been appraised in line with the site assessment criteria. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 7: heritage, it is correct for the SA to have utilised a precautionary approach.</p> <p>With regard to SA objective 8: water, the site received an uncertain significant negative effect because the site is within an area with a 1 in 30 year risk of surface water flooding. Further to this, the site</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Supermarket <800m (0)</p> <p>Post Office <800m (0)</p> <p>Pub <800m (0.5)</p> <p>Settlement Classification (4)</p> <p>Total (7.4)</p> <p>$7.4 / 17 * 100 = 43.5\%$</p> <p>A total percentage of 43.5%, would place the site within the 'Good' band for accessibility.</p> <p>SA Objective 5:- The site relates to a group of fields containing semi-improved grassland. The tree belts are limited to the periphery of the site, where the trees would benefit from active management relating to non-native species and trees with poor health conditions. Given the extent of Berkeley's land holding it may be possible to conserve and enhance the biodiversity of the site, achieving a net gain through the active management of the tree belts and additional planting within Berkeley's retained land in the wider land holding. Berkeley therefore would suggest that the SA score of uncertain significant negative is overly precautionary.</p> <p>SA Objective 7: A uncertain significant negative score, due the sites setting within 250m of a heritage asset, is overly precautionary. The nearest heritage assets within Coldharbour Lane (The White House), Berkeley's own Oakhill House development, and Hildenborough Conservation Area are not visible from the site, and would otherwise be screened by committed development.</p> <p>SA Objective 8: The SA states that more than 25% of the site is within Flood Zone 3 and/or is within an area with a 1 in 30 year risk of surface water flooding. The entire site is however located within Flood Zone 1, and therefore is at the lowest risk of flooding. Berkeley's initial Flood Risk Assessment prepared by WSP acknowledges that there is a small area within a 1 in 30 year risk of surface water flooding. However, it is noteworthy that this area is under 25% of the site, relates to existing drainage attenuation and depressions in the land, is located in an area of the site that is adjacent to an area already the subject of land form changes (Applications 20/02441/FL and 22/01753/F), and can otherwise be mitigated and re-compensated for as part of a detailed drainage design strategy and modelling.</p> <p>SA Objective 9: The SA assessment of Objective 9 ranks the site as an uncertain significant negative. However, the site is not currently in productive agricultural use and is landlocked without direct access other than through Berkeley's wider Oakhill House estate, via third party land or the creation of an access onto Woodfield Avenue or Tonbridge Road, as part of a development. Due to known soil conditions within the Oakhill House development site, the majority of the site is expected to be of a moderate quality in Subgrade 3 and in part will be impractical to farm due to land form changes (Applications 20/02441/FL and 22/01753/F)."</p>	<p>contains a water body of watercourse or falls within Source Protection Zone 1. The 'policy-off' appraisal of the site in this section of the SA does not take into consideration mitigation, rather it is based on the physical constraints of the site. This ensures all sites are appraised in a consistent manner.</p> <p>The Strategic Flood Risk Assessment (SFRA) which informed this SA objective will be updated. Therefore in the next iteration of the SA Report, the site appraisals will reflect more up-to-date flood risk data.</p> <p>With regard to SA objective 9: soils, the site has been appraised in line with the site assessment criteria. The site comprises greenfield land, a significant proportion of which is classified as Grade 3 agricultural land. It is irrelevant whether the site is currently in agricultural use or not.</p>

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42203041	Q8 of the questionnaire	<p>"Individual site reference number: 59714</p> <p>Berkeley is concerned about the SA ratings given to this site. Whilst some scoring may be due to differing judgements applied, there appear to be factual inconsistencies in the assessment, most notably in terms of accessibility where the site is rated as 'fair' (SA Objective 2) and in relation to flood risk (SA Objective 8).</p> <p>SA Objective 2: Berkeley suggests that the above site, relating to land off Offham Road, West Malling, has been incorrectly assessed within the Urban Capacity Study, which has led to its rating within the Fair Accessibility Band and a minor negative within the corresponding SA Objective. As per the methodology within the Urban Capacity Study, our analysis highlights why the site should be ranked within the 'Very Good' Accessibility Band.</p> <p>*Please see our emailed response for our assessment of the site's accessibility score. Despite uncertainty regarding how the score is calculated for the Bus Stop Service Level, a lowest possible score of 0.4 still takes the site's cumulative score to a total of 10.4. This shows that using the council's methodology in the Urban Capacity Study, the site should score 61% and therefore be placed within the band labelled as 'Very Good' accessibility.</p> <p>SA Objective 5: The site is a field with short grass that contains a small tree belt consisting of approximately a dozen small trees. Other than the site being undeveloped it is unclear as to why the site is considered a 'green infrastructure asset'. The site is not currently publicly accessible and contains no habitat of exceptional biodiversity value. In addition, it may be possible to conserve or even enhance the biodiversity of the site through the design of the landscaping and the new homes. Therefore, the uncertain significant negative assessment should be reconsidered.</p> <p>SA Objective 6: The scoring of uncertain minor negative from the development of the site for landscape and character should instead be negligible. The site is well enclosed, with development to the north and east of the site and further development bordering the site to the south and west. The site is therefore more closely associated with the existing built form of West Malling, effectively sitting within its confines, than it is with the open countryside further out to the south and west of the site.</p> <p>SA Objective 7: Berkeley suggests that the method of scoring the site with an uncertain significant negative due to the site's setting within 250m of a heritage asset may be overly cautious. The key views of these heritage assets are from St. Leonard's Street and the centre of the town. Views between the site and the St. Mary's Church are limited. There are few viewpoints into the Conservation Area from neighbouring properties due to the height of the surrounding vegetation and the relatively recent development at the back of Douces Manor screens the listed building. Berkeley has previously commissioned a Heritage Assessment, which has concluded there will be no material harm to any of the designated heritage assets or non-designated historic buildings resulting from the development.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 2: services and facilities, this comment relates more specifically to the Urban Capacity Study (July 2022) than it does the SA.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the green infrastructure asset the site proforma is referring to is an area of woodland overlapping the south eastern edge of the site. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 6: landscape, the site has been appraised in line with the site assessment criteria. The site is considered to be on the edge of the settlement of West Malling.</p> <p>With regard to SA objective 7: heritage, it is correct for the SA to have utilised a precautionary approach. Mitigation is not taken into consideration in the 'policy-off' appraisals of the sites contained within Chapter 5 and Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 8: water, the site receives a mixed significant negative and negligible effect. The significant negative effect is as a result of the site falling within an area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the site not containing a water body or watercourse, or falling within a Source Protection Zone.</p> <p>With regard to SA objective 9: soils, the site has been appraised in line with the site assessment criteria. The site comprises greenfield land, a significant proportion of which is classified as Grade 3 agricultural land. It is irrelevant whether the site is currently in agricultural use or not.</p> <p>With regard to SA objective 13, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Additionally, the proposals will be designed sensitively and will have a neutral impact on Sub Areas C and E of the West Malling Conservation Area, meaning the site will not unacceptably impact on the significance or setting of St. Mary's Church.</p> <p>SA Objective 8: Berkeley suggests that the result of this Objective, classified as both a significant negative / negligible effect, may be incorrect. The SA states that more than 25% of the site is within Flood Zone 3 and/or is within an area with a 1 in 30 year risk of surface water flooding. The EA flood risk maps for planning show that in terms of fluvial flooding the entire site is located within Flood Zone 1, and therefore is at the lowest risk of flooding. Berkeley's initial Flood Risk Assessment prepared by WSP acknowledges that there is a small area within a 1 in 30 year risk of surface water flooding, although this area is under 25% of the site. Any issues regarding surface water flooding can be effectively mitigated through the incorporation of sustainable urban drainage systems within the development.</p> <p>SA Objective 9: The site is located to the south-west of West Malling and consists of one field, comprising grass pasture, currently unused for agricultural purposes. The SA assessment of Objective 9 ranks the site as an uncertain significant negative. However, the site is not currently in productive agricultural use and realistically cannot be of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed. It would not be suitable for modern agricultural vehicles to farm for crops and the size of the field would mean that animals could only be grazed temporarily before having to be moved on regularly, which is not practical.</p> <p>SA Objective 13: The site is classed as an uncertain minor negative with regards to protecting material assets and minimising waste. The SA reports that this is due to uncertain effects as to whether the site can viably offer mineral extraction. However, the site is likely too small to viably support mineral extraction. Any extraction prior to development would likely have adverse amenity impacts for residents living adjacent to the site."</p>	
42606657	Q8 of the questionnaire	<p>"Site 59611. The inclusion of this vacant, brownfield, previously developed site, sandwiched between the A20 and M20, as a potential employment site is welcomed. However, its assessment within the Sustainability Appraisal against the following five of the SA Objectives should be reconsidered:</p> <p>SA Objective 4-- An industrial/warehousing allocation on the former Stocks Nightclub and Spring Villas site would contribute towards diversifying employment opportunities, increasing employment, encouraging economic growth, reducing levels of unemployment and improving physical accessibility to jobs. It therefore satisfies all of the sub-objectives of SA4.</p> <p>Th1090oesn'on given in the Interim Sustainability Appraisal for only attributing a 'minor positive' to the site is because it is not within 800 m of a train station or within 400 m of a bus stop. What the scoring</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 4: economic growth, the site receives a minor positive effect instead of a significant positive effect because it is smaller than 5ha. It also receives a negligible effect, as it is not within 800m of a train station or 400m of a bus stop or cycle path. SA objective 4 appraises the distance employment sites are to train stations, bus stops and cycle paths, as this gives an indication of how accessible sites are to the local workforce. If a site is within close proximity of a railway station, that it will be easier for workers to reach the site.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>criteria fails to take into account is that there are different types of employment, which have different locational criteria.</p> <p>Whilst it is right for high density office uses to be directed to town centres and to sites in close proximity to public transport nodes, this vacant, scrubland site is being promoted for industrial/warehousing, not offices. The NPPF only seeks to apply such a sequential approach to applications for main town centre uses, such as offices (paragraph 87). It does not apply to industry/warehousing, for which its proximity to the strategic road network, and the motorways in particular, should enable the site to score more highly.</p> <p>The fact that industrial/warehousing units could be accessed on this site without the need for HGVs to travel through towns, where they would cause congestion and potential air quality problems, should be taken into account and should be given just as much, if not more weight, than proximity to public transport. The different characteristics of warehousing is also recognised in the NPPG. Whilst most of the guidance is focused on the big strategic facilities, it states that ""the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinctive locational requirements that need to be considered"" (my emphasis) paragraph: 031 Reference 2a-031-2019 0722.</p> <p>Currently, the Borough Council is not planning specifically for industry/warehousing and is treating all employment generically. That is not appropriate here. The Council should have regard to its up-to-date Economic Development Needs Study, August 2022. It advises the Council that the largest employment sector in Tunbridge & Malling in 2021 is wholesale and transport. It goes on to identify particular growth opportunities for logistics in the Borough.</p> <p>The Economic Development Needs Study concludes that over the plan period there is a need for 292,940 m² of new industrial and storage/distribution development. This compares to just 53,320 m² of new office space (18% of the total employment requirement). Therefore greater weight should be given to the location requirements for industrial/distribution space, for which this brownfield site (ref: 59611) is ideally suited.</p> <p>It is worth noting that the Borough Council has allocated the Invicta Business Park and Marley site immediately opposite, as employment land under Policy E2 and therefore the Council has already recognised that this is an appropriate location for employment development.</p> <p>In the light of the above, the site should therefore be reclassified as having a 'significant positive' (++) in respect of the economic growth objective.</p> <p>SA Objective 5-- The Sustainability Assessment states that the site contains an existing green infrastructure asset that could be lost as a result of new development and therefore under objectives set out under SA5, the site is classified as an ""uncertain significant negative"".</p>	<p>The SA takes into consideration air quality and due to the fact the site is not within 100m of an Air Quality Management Area, it receives a negligible effect in relation to SA objective 12: air quality.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity because it contains a green infrastructure asset in the form of woodland and thick vegetation. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p> <p>Although the respondent states that there is an opportunity to enhance the biodiversity value of the site, this is a 'policy-off' appraisal that does not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Having regard to the criteria, the former Stocks Nightclub and Spring Villas site is previously developed land that is not designated for nature conservation, nor are there any known rare endangered species and the landscaping belt along the M20 would remain unaffected. The site does not provide any public access for people to access wildlife or open green spaces. The main central part of the site, which would be subject to the redevelopment, could not be regarded as a green 'asset'. This is derelict scrub land that is vacant and unutilised, with limited biodiversity value. Through redevelopment, there is an opportunity to enhance the biodiversity value of the site, and therefore far from being an ""uncertain significant negative"", the land offers the opportunity to make a positive contribution. The site should therefore be reclassified as a 'minor positive' (+) in respect of biodiversity in the Sustainability Assessment.</p> <p>PLEASE NOTE: How a redevelopment of Site 59611 for industrial/warehousing would sit with objectives SA6, SA7 and SA10 is provided separately, due to the character limit imposed here."</p>	
42729633	Q8 of the questionnaire	<p>"With regard to Site 59831) Land east of Bull Lane) the following comments are made on the SA:</p> <p>SA2: This score is based on the accessibility assessment in the urban capacity study – which itself focused on the urban areas of the borough. It is questionable whether the same criteria can fairly be applied to any rural site to inform the SA, when it is clear that by its very nature a more rural site will not be as accessible as one located in a main town and village. In any event, the site has not been assessed in the UCS and the accessibility assessment of the site against the criteria has not been published. This is required for comments to be provided on SA2 scoring.</p> <p>SA4: The site's location may help to increase footfall and demand for local shops and services, supporting sustainable economic growth in this area and benefiting the local community. The site's development would also support the economy in and around the larger urban areas nearby. A score of + (minor positive) could be given.</p> <p>SA5: the site is close to Wagons Pit Aylesford but is not in it. Development of the site would be carried out to ensure this geological site is safeguarded. Further, a landscape led approach incorporating green infrastructure could significantly enhancing the site which is used as part of the vineyard. Thus, Chapel Down does not agree with TMBC's score.</p> <p>SA6: The site is next to Eccles, and immediately adjoins a formerly allocated site. the site is not designated open space nor does it provide any public recreational benefit. This conclusion is incorrect. As stated, a landscape led design can ensure development is appropriate for the character of this locality. This score should be minor negative at worst, pending design details.</p> <p>SA7: the site may be within 250m of a heritage asset as the crow flies. However, there are roads and buildings (including numerous houses)</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>In the Urban Capacity Study (July 2022), site 59831 is recorded as falling within the Fair Accessibility Band. This information has fed into the SA.</p> <p>With regard to SA objective 4: economic growth, the site has been appraised in accordance with the site assessment criteria.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives an uncertain significant negative effect in relation to this objective, as it is next to Wagons Pit Aylesford Regionally Important Geological Site, in addition to overlapping a green infrastructure asset along its eastern edge (trees/thick hedgerow). With regard to this last point, the following sentence will be added to the site assessment criteria in the next iteration of the SA Report: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p> <p>Although the respondent acknowledges that a landscape approach incorporating green infrastructure could enhance the site, this is a 'policy-off' appraisal that does not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape and townscape, although the site is located within close proximity to the settlement of Eccles, it does not adjoin it. Therefore, the site receives an uncertain significant negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>between them. There the sites development is unlikely to have any impact on a heritage asset. Evidence can be provided to demonstrate this at the design stage. A minor negative score should be given at this stage.</p> <p>SA9: this refers to soil resources and contamination. A minor negative score is more appropriate as TMBC has not made any reference to contamination; further contamination is not anticipated at the site and a survey can be undertaken if required.</p> <p>SA13: owing to the size of the site, its location adjacent to a settlement and adjacent to a former allocation (pending planning application) it is not expected that it could offer opportunities for mineral extraction. A zero score is more appropriate as a result."</p>	<p>With regard to SA objective 7: heritage, the site is located within 250m of a number of heritage assets, as recorded in Kent County Council's Historic Environment Record. This is a 'policy-off' appraisal and so consideration is not yet given to mitigation.</p> <p>As stated on the proforma for the site, it receives a significant negative effect in relation to SA objective 9: soils because it comprises greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p>
42452545	Q8 of the questionnaire	<p>"We have undertaken a review of the Interim SA site assessment for Coblands Nursery-- site reference 59746.</p> <p>It is understood that the scoring applied to the site is based on computer modelling which should be a starting point but does not provide sufficient detail.</p> <p>We have provided a finer grain assessment of the scoring for site reference 59746 which has adjusted scoring for human health/wellbeing, biodiversity, landscape character, heritage impact and mineral impact. This is presented with the benefit of a more refined review, taking account of the specific location and impact of development.</p> <p>A response has been provided under Comment ID 31 to the SA Annex 1 consultation but please see attached and submitted document titled Interim SA review-- site 59746."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>We have provided a response to your original comment, which can be found at the start of the table in the row with Respondent ID 12097205 (page 13).</p>
25369441	Q8 of the questionnaire	<p>As a general comment the methodology appears complex with some ten different colours and symbols used to summarise the results for each category. In addition many of the results simply highlight an uncertainty as to the likely impacts as clearly much will depend upon the way in which sites are designed and their ability to provide mitigation and / or enhancements. Their value in assessing potential allocations is limited in this regard. That aside we comment on the assessment of our client's site at Drylands Road, Borough Green, (site reference 59748 on pages 583 – 585) in the context of the various SA objectives as necessary. Site Reference 59748 – Land off Dryland Road, Borough Green. SA Obj 1-- The Sustainability Appraisal (SA) lists the site as likely to have significant positive effects and uncertain negative effects. Paragraph 5.4 of the SA states that negative effects under this category are likely to relate to sites that contain "an area of open space or accommodate an outdoor sports facility that may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on the exact scale, layout and design of development and whether these existing features are in fact lost to new development." In this regard it is relevant to note that the</p>	<p>As outlined by the respondent, a number of the effects in the SA are recorded as uncertain due to several reasons, including the fact that some of the effects will depend on the final design, scale and layout of development which will be provided at planning application stage if allocated.</p> <p>With regard to SA objective 1: health and wellbeing, the site contains a bowling green and therefore receives an uncertain significant negative effect, as the bowling green could be lost to development. The uncertain significant negative effect is coupled with a significant positive effect, as the site is within 800m of a healthcare facility and existing areas of open space and a walking path.</p> <p>This is a 'policy-off' appraisal that does not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>The justification text for SA objective 1 has been missed from the proforma as an error and in the next iteration of the SA Report will be added in.</p> <p>Site 59748 is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. The Urban Capacity Study</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>site is private land, it does not include any public open space or sports facilities that would be lost through development. The site proposals include the provision of new publicly accessible footpaths and open space which would result in a significant improvement in terms of access to opens pace in this area. An indicative site plan is included to demonstrate this. (Please note this will also be emailed separately). It is noted that site number 59710 (Land near the garden centre at Borough Green Road) has been ranked as a significant positive in terms of improving human health and well-being. The assessment states that this is because the site lies within 800m of an existing healthcare facility and an area of open space/play area/sports facility. Our client site at Drylands Road (59748) lies close to a bowling club, (50m) and a recreation ground (100m) and within easy walking distance of the Borough Green Medical Centre (260m) but these aspects are not referenced in the text. This should be added for consistency. A separate submission is being emailed to the Council alongside a facilities plan to demonstrate the sustainability of the site and its ease of access to local facilities. SA Obj 2- The site is noted as having 'fair' accessibility to facilities and services. The SA notes that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater." Given the above there is clearly potential for sites to score well based on a straight line distance whilst in reality, due to inaccessible third party land and the locations of footpaths to key facilities, to perform far more poorly in reality. This is important in the case of our client's site 59748 which has the ability to link directly to existing footpaths and so access services directly and easily. The site similarly has the potential to deliver new links across and through it and so improve accessibility for new and existing residents. When assessing the sustainability of the site in 2016 as part of the previous call for sites process the summary report concluded: "In terms of access to services, this site is in a sustainable location, adjacent to the built-up confines of Borough Green". The overall assessment was that the site should be categorised as 'green' and so considered "suitable and deliverable". As set out above a separate submission with detailed facilities plan is being sent to the Council via email. SA Obj 5- The appraisal assesses the site as having "uncertain significant negative" effects. The associated text states: "The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity site.". The site contains an existing green infrastructure asset that could be lost as a result of development. The effect is uncertain as it may be possible to conserve or even enhance the asset through design and layout of the new development." The DEFRA 'Magic' Map confirms that the site is approximately 1km away from the Bourne Alder Carr SSSI and approximately 310m from the Kent Downs AONB. No other sites are highlighted on the map. It is not therefore clear why the assessment notes that site as being within 250m of a designated site. We ask that this is reviewed and corrected. The site assessment should be amended to show at least a neutral</p>	<p>does not utilise straight-line distances but actual public footpaths. Therefore, this information has fed into the appraisals of SA objective 2: services and facilities.</p> <p>The other SA objectives are reliant on straight-line distance but this is acknowledged in the SA under the section entitled 'Difficulties and Data Limitations'.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives an uncertain significant negative effect in relation to this objective, as it contains some green infrastructure assets along its northern edge (thick vegetation and woodland) and abuts Bourne Valley Woods Local Wildlife Site and area of Ancient Woodland. Green infrastructure assets do not have to be publicly accessible to be identified as green infrastructure assets. Although the respondent notes that biodiversity net gain will be achieved on-site, this is a 'policy-off' appraisal that does take into consideration mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		score for this element. In terms of the reference to the site containing a “green infrastructure asset”, it is noted that the site is private agricultural land. It is not publicly accessible. Notwithstanding this, as part of the sites development it is proposed to deliver a significant biodiversity net gain. This has been assessed by Corylus Ecology Consultants. In summary, the whole of the site comprises 7.6834ha with 2.5ha shown as holding potential for development of approximately 45 – 50 new homes directly adjoining the settlement edge. This leaves 5.1516ha of wider land remaining. It is proposed that 3ha is designated as a biodiversity net gain area to provide 20% net gain for another site within the district. A further area is capable of providing at least 30% biodiversity net gain for the site, along with general amenity open space, footpaths and walking routes as indicated on the accompanying plan. This aspect of the assessment should be updated to note the site as having a significant positive effect. SA Obj 7- The SA suggests “uncertain significant negative” effects under this category on the basis that the site lies within 250 metres of a heritage asset. Having reviewed the heritage mapping system provided by Historic England <i>[Word limit reached on submission]</i>	
42821249	Q8 of the questionnaire	<p>"we agree and support the assessment of the individual sites within the SA at Annex 1, particularly the assessment of Court Lane Nurseries (Site ID: 59853 / 59857) which against the SA objectives, scores the highest in Hadlow / East Peckham ward.</p> <p>We have the following further comments to make on the SA Assesst:</p> <p>4) 1) Hadlow is a sustainable location for growth</p> <p>In relation to existing settlements in the Borough, the findings of the SA site assessments clearly suggest that Hadlow is one of the most sustainable settlements to accommodate growth within the new Local Plan, against all objectives, given its accessibility to existing services and facilities. This is also illustrated by Hadlow's place in the settlement hierarchy as a Rural Service Centre (Tier 2 settlement).</p> <p>Furthermore, upon a review of all sites located within the “Hadlow / East Peckham” ward, those sites located within and around Hadlow are the most sustainable against the SA objectives, in comparison to others that are located away from Hadlow village.</p> <p>The settlement has a wide range of services and facilities, access to public transport and has limited designations, other than Green Belt, therefore can promote sustainable development, in line with NPPF, Para. 11.</p> <p>2) Court Lane Nurseries is the most sustainable site with Hadlow</p> <p>12 sites have been identified and assessed as part of the SA at Hadlow.</p>	Support noted.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>We conclude that it is clear that the site at Court Lane Nurseries (Site ID 59853 / 59857) scores the highest against all SA objectives. We consider this assessment of the sites to be accurate.</p> <p>Most significantly, as identified by the Council, what sets Site ID 59853 / 59857 above all of the other sites is that it is brownfield land. As a result, the SA assessment scores the site as having a “significant positive effect likely” against SA Objective 9, which states “the site is located on brownfield land”, as well as SA Objectives 3 and 4, which relate to accessibility to schools and economic growth. Overall, the site scores the most “positive effects” out of all the sites assessed in Hadlow.</p> <p>We support the findings of this assessment which in accordance with the NPPF mean that the site should come forward for future development / achieve site allocation in the new Local Plan. This point is further explored below.</p> <p>3) Court Lane Nurseries is brownfield land</p> <p>The site at Court Lane Nurseries (Site ID 59853 / 59857) is the only site at Hadlow that is identified as being brownfield land.</p> <p>Against SA Objective 9, the site scores as having a significant positive effect. All other sites within Hadlow are considered to be greenfield and containing a proportion of Grade 1 or 2 agricultural land therefore scoring as having a “significant negative effect likely”.</p> <p>We agree and support this assessment given the site contains a number of large buildings and glasshouses, most of which are now vacant and at risk of becoming derelict and possibly vandalised. The site also contains significant hardstanding, including a concrete vehicular access and a large area of the site being covered in gravel to facilitate overflow parking facilities for College students.</p> <p>In line with Para.119 of the NPPF, strategic policies should promote an effective use of land and should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.</p> <p>Therefore, we recommend that Court Lane Nurseries, Hadlow should be considered in the first instance for an allocation within the new Local Plan."</p>	
42498817	Q8 of the questionnaire	<p>"I disagree with SA of site 59811 as promoting health and wellbeing – would harm Green Belt, surrounded by footpaths and open countryside. Agree that on all other measures it would represent a negative impact to the identified strategic assessments. As off-grid, most likely domestic heating oil would be used in any large-scale development which would harm air quality.</p> <p>In general I strongly agree with the fact that the SA assessment is very negative for options 4 & 5"</p>	<p>Site 59811 receives a minor positive effect in relation to SA objective 1: health and wellbeing because, in line with the site assessment criteria, it is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both).</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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42815777	Q8 of the questionnaire	<p>"1. Site 59821, 59823, 59683ply</p> <p>4) i)1097oesn'tulfills all the 5 objectives of Metropolitan Green Belt.</p> <p>The above sites to the North of Oast Lane directly on the boundary between Tonbridge and Hildenborough serves as a green wedge effectively protecting Hildenborough's status as a village and stopping it becoming absorbed into the urban sprawl of Tonbridge. It is not infill within the village and will effectively remove any demarcation between the town and the village. Hildenborough will become part of the town forever and will completely lose its identity.</p> <p>ii) Development on these sites will lead to a significant loss of productive agricultural land which has been farmed for decades</p> <p>iii) (SA Objective 5 , 6 and & 7) Environment- These sites are the start of a vast stretch of open countryside stretching all the way to Shipbourne and beyond. It provides protection against flooding, opens out onto a historic orchard used in the hop industry. As such it attracts birds of prey including buzzards, barn and screech owls, swifts, swallows and roe deer. There are two very old ponds and multiple mature trees over a hundred years old which would be destroyed forever if these sites are developed.</p> <p>This site IS located near a rural settlement namely the 8 houses off Oast Lane four of which (1 oast houses, 1 cottage, 1 hop barn and 1 bull barn) are of significant cultural heritage being used in Kent's historic hop and farming industry. If the fields surrounding these properties were to be developed the essence of the rural nature of these historic hop properties would be lost forever.</p> <p>iii) Infrastructure: The bus service through Hildenborough out of rush hour is only hourly and access to train stations is not within an acceptable walking distance for many people being more than 30 mins to Tonbridge train stations and an hour to Hildenborough from the South side.</p> <p>iv) SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change: Development of these sites, being over 2 miles from the North access to the A21 (Morley's Roundabout), would result in a significant amount of south bound traffic joining the already congested B245 route towards Tonbridge High Street to join the A21 (Vauxhall Lane junction).</p> <p>During rush hour the queues from the intersection with the Shipbourne Road and the High Street already tail back to Dry Hill Park Road and this will only cause further congestion backing up through Hildenborough village and Shipbourne Road causing more pollution and for the local residents and school children. Over 450 children live during term time in the boarding houses on these main roads and they will be directly affected by the pollution caused by any increase in traffic in the North Tonbridge/ South Hildenborough area. The adverse health effects of such pollution on children and the links to asthma are well documented. As well as Tonbridge boarding school</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is important to note that the SA findings are one of many factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers when selecting preferred options for a plan.</p> <p>As acknowledged in the proformas for these sites against SA objective 9: soils, each comprises greenfield land and contains a significant proportion of Grade 3 agricultural land. Therefore, each site receives a significant negative effect against this objective. The effect is recorded as uncertain to acknowledge the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, all three sites receive an uncertain significant negative effect against this objective.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59821 and 59683 are recorded as having significant negative effects in relation to this objective. In the next iteration of the SA, the effect for site 59821 will be upgraded to a minor negative effect, as it is incorrectly recorded as not located near any settlements in a rural location. This is as a result of the GIS analysis identifying some sites as not located near any settlements even though they are on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. The effect for site 59683 will not be upgraded because while the site adjoins a settlement, it contains an open space that could be lost as a result of development. All adverse effects against the landscape objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>Site 59683 is incorrectly recorded as not being located near any settlement, even though it adjoins the settlement of Tonbridge. The reason for this is that only a small percentage of the site adjoins the settlement. The uncertain significant negative effect is still considered reasonable, given the size of the site.</p> <p>With regard to SA objective 7: heritage, all three sites are recorded as having uncertain significant negative effects in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>there are 2 primary schools on Dry Hill Park Road which will also be affected by pollution should traffic increase.</p> <p>The traffic along the B245 is solid at rush hour and without lights or a roundabout the ability of traffic leaving Oast Lane to drive North Bound will be severely restricted causing traffic to back up a short access road.</p> <p>vi) SA Objective 2: To improve equality and access to community facilities and services: Local services already under considerable strain – in particular Hildenborough's GP surgery and schools & school buses. Already a considerable number of houses being built on Fidelity site plus the new care home will begin to affect those services too.</p> <p>Vii) The B245 regularly floods in particular by Waterfield Lane and Farm Lane.</p> <p>Any destruction of greenfield sites on the North (higher) side of this Road will cause more rain water to run into the B245 and causing flooding to the properties on the South of this road. Properties around Correnden Road and Hawden Lane/Road have flooded in the past and will do some more regularly.</p> <p>Viii) Development will irrevocably alter the open, semi-rural, low-density character of the communities on the current edge of Tonbridge town</p> <p>ix) None of the sites identified on the Green Belt around Tonbridge are easily accessible to local facilities – shops, schools, medical facilities with spare capacity"</p>	<p>With regard to bus services, SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. With regard to SA objective 10: climate change mitigation, the criteria for this objective look at proximity to railway stations, bus stops and cycle paths, so as to encourage more active and sustainable transport modes. All three sites receive a minor positive effect in relation to this objective because although they are more than 800m from a railway station, they are within 400m of at least one bus stop.</p> <p>The site assessment criteria for SA objective 2: services and facilities relate more specifically to access to services and facilities, rather than capacity of existing services as this is challenging to quantify</p>
42794625	Q8 of the questionnaire	The findings may all be appropriate but it is impossible to comment with no significant knowledge of each local site. To find my local site was impossible, too. A detailed and properly linked Table of Contents is missing.	The unique ID numbers are how the sites are referred to throughout the Local Plan and so names for each site have not been provided. In the next iteration of the SA Report, the proformas will be structured by ward and a Contents page provided.
42815521	Q8 of the questionnaire	<p>"Site 59830: Due to the huge size of this site the assessments are essentially meaningless. SA Objectives 4, 10: While some parts of the site might be 800m from a railway station other areas will be significantly further and experience shows that rail commuters will drive either to the nearest rail station or Sevenoaks which has a faster and more direct service to London. This is at best an Uncertain Significant Negative (not a Certain Significant Positive). SA Objective 1: No evidence is given to support the bizarre assessment of it being Significant Positive / Uncertain Significant Negative.</p> <p>A number of other sites in the list are adjacent to one another and yet assessed in isolation. Some rely on the presence of nearby green spaces to justify a positive assessment on health / well-being - and yet these green spaces are threatened by their inclusion in other potential sites that in turn rely on yet another site. The lack of an easy to find overall map which shows all of the sites and how they relate to one another is a fatal weakness in this part of the consultation process. I am sure it isn't a deliberate attempt to deceive.</p>	<p>It is often unknown where the entrance to a site will be until planning application stage. In the SA, distances from the edge of a site option to existing services was calculated using the smallest distance between the site and the existing service. However, the SA acknowledges in the 'Difficulties and Limitations' section of the report that actual walking distances could be greater.</p> <p>Chapter 5 and Annex 1 of the Interim SA Report contain an appraisal of each separate site. In the next iteration of the SA Report, there will be a 'Cumulative effects' section. It is the purpose of this section of an SA Report to consider the effects that a plan as a whole will have on an area.</p> <p>In the next iteration of the SA, a map will be provided that shows the location of all reasonable alternative development site options.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		For example Sites 59593, 59600, 59881, 59665 and others produce what is essentially ribbon development along the line of the M26 motorway and all claim the same minor positive of being within 800m of an open space."	
25406913	Q8 of the questionnaire	<p>Within Annex 1: Reasonable alternative development site options of the Sustainability Appraisal there are some important factual inaccuracies which skew the assessment of our submitted sites. We set out below the corrected facts. Due to word limits, the full response is also submitted under the SA Annex 1 section of the consultation.</p> <p>Site 59825: Land north of Back Lane, Shipbourne (5 Acre Field) SA states: "The Site is within an area of open space or currently accommodates a sports facility and this may be lost as a result of development" Correction: There is no public access to this site, it is private land owned by the Fairlawne Estate. There are no public footpaths crossing the site nor are there any sports facilities to be lost. SA states: "The Site includes employment development smaller than 5ha in size." Correction: This is not applicable given only residential development is proposed and there are no existing employment uses on the site. Site 59823: Oast Lane, Tonbridge SA states: "The Site is located in the Fair Accessibility Band". Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilities in the Town, the site must logically be placed in a higher accessibility zone. The SA states: "The Site includes employment development smaller than 5ha in size." Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. The SA states: "The site contains an existing green infrastructure asset that could be lost as a result of new development". Correction: The site contains no green infrastructure asset, adjoins the built-up edge of Tonbridge, is not a designated open space and has no public access. SA states: "The Site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. SA states: "The Site is within a Minerals Safeguarding Area". Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within any minerals safeguarding area. Site 59821: Oast Lane, Tonbridge SA states: "The Site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, site 59825 is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Shipbourne Common) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>Sites 59825, 59823 and 59821 have been appraised as mixed use sites. The positive effects these sites are expected to have in relation to SA objective 4: economic growth are as a result of the fact these sites would include employment development.</p> <p>Following discussions with Tonbridge and Malling Borough Council, site 59825 will be reappraised as a residential site in the next iteration of the SA.</p> <p>Sites 59823 and 59821 are recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. Site 59804 is recorded as falling within the Good Accessibility Band and site 59801 is recorded as falling within the Poor Accessibility Band. This information has fed into the SA.</p> <p>Site 59823 does contain an existing green infrastructure asset in the form of a line of woodland/thick vegetation to its east.</p> <p>With regards to SA objective 8: water, sites 59823, 59779 and 59801 receive a mixed significant negative and negligible effect. The significant negative effect is as a result of the sites falling within an area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the sites not containing a water body or watercourse or falling within a Source Protection Zone. Sites 59821 and 59804 receive an uncertain significant negative effect. This is because site 59821 falls within an area with a 1 in 30 year risk of surface water flooding and partially falls within Source Protection Zone 2. Site 59804 falls within an area with a 1 in 30 year risk of surface water flooding, in addition to containing a watercourse and slightly overlapping Source Protection Zone 3.</p>

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		<p>development.” Correction: The site is not a designated open space, has no public access and does not accommodate a sports facility. SA states: “The Site is placed in the Fair Accessibility Band.” Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site’s position on the edge of Tonbridge and the broad range of services and facilities in the Town, the site must logically be placed in a higher accessibility zone. SA states: “The site includes employment development more than 5ha in size.” Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. SA states: “The Site is not located near to any settlements in rural locations.” Correction: The statement is nonsensical. The site adjoins the built-up edge of the principal urban area of Tonbridge. A highly sustainable location. SA states: “The Site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding.” Correction: On the basis of the Environment Agency’s flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources SA states: “The site is within a Minerals Safeguarding Area.” Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within a minerals safeguarding area (it is in close proximity). Site 59778: Allotment Site, The Street, Plaxtol SA states: “The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development.” Correction: The Site does not accommodate outdoor sports facilities; however it does include a private allotment site. The land which accommodates the allotments is wholly owned by the Fairlawne Estate and the allotments could be retained or relocated if required. Commentary on other FECL sites continued in SA response due to word limit restrictions</p>	<p>Sites 59823, 59821 and 59801 are identified as falling within a Minerals Safeguarding Area. Therefore, they receive an uncertain minor negative effect in relation to SA objective 13: material assets.</p> <p>With regard to SA objective 1: health and wellbeing, site 59821 is also incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Tonbridge Farm Sportsground) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59821 and 59823 are recorded as having significant negative effects in relation to this objective. In the next iteration of the SA, these effects will be upgraded to minor negative effects. This is because the GIS analysis identified some sites as not located near any settlements in a rural location when they are in fact located on the edge of a settlement, as there was no percentage overlap with the settlement boundaries.</p> <p>It is correct that site 59778 receives uncertain significant negative effect in relation to SA objective 1: health and wellbeing, as it contains an open space in the form of allotments. Although the respondent notes that the land which accommodates the allotments (owned by the Fairlawne Estate) could be retained or relocated, these are 'policy-off' appraisals of the sites that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis. The uncertain significant negative effect is mixed with a minor positive effect,</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA acknowledges that site 59779 is within 250m of Ancient Woodland through the sentence "The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites". LUC acknowledge that this sentence does not explicitly refer to Ancient Woodland, even though Ancient Woodland was included in the GIS analysis. In the next iteration of the SA, the sentence will be revised to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites or Ancient Woodland". The SA also now acknowledges that the site is within 250m of Shipbourne Common Local Wildlife Site.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of a hamlet, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct. In the next iteration of the SA Report, we will add</p>

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			<p>this limitation to the 'Difficulties and Data Limitations' section of the SA..</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not state that site 59779 comprises open space.</p> <p>However, site 59804 does contain an open space, as acknowledged in the SA. Frogbridge Wood is located in its north eastern corner.</p> <p>As only a small percentage of site 59804 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, we will refine the GIS analysis so that sites where there is very little overlap with existing settlements are still recorded as bordering those settlements. However, the effect will remain the same, as the site contains an open space that could be lost as a result of development.</p> <p>With regard to SA objective 7: historic environment, site 59801 is located within 250m of a heritage asset (Horns Lodge), as recorded in the Kent Historic Environment Record.</p> <p>As only a small percentage of site 59801 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, the site will receive an uncertain minor negative effect in relation to SA objective 6: landscape and townscape.</p>
42715009	Q8 of the questionnaire	<p>"SITES 59735, 59798, 59801, 59804 and 59835 cover the same or overlapping areas but have different assessments. As such, the assessments have questionable credibility and are illogical. The assessments appear rushed and ill considered, underestimating the impact on human health (SA1), greenhouse gas emissions (SA10) and air quality (SA12). The footpath within Horns Lodge lane runs alongside these sites and is used daily by walkers, dog walkers, joggers, cyclists and horse riders. It is essential to the physical and mental well being of a large cross section of the local community. To develop these sites would generate noise, traffic and pollution and be detrimental to the well being of the local community-.</p> <p>SA3 - local schools are at maximum capacity, so contrary to the assessment, will not improve educational attainment.</p> <p>Development of these sites would result in the loss of very important green belt land, destroy woodland (some being protected ancient woodland).</p> <p>I believe a large pipeline runs through the area and has associated protection orders.</p> <p>There are many more negatives that space precludes going in to further detail but these sites are totally unsuitable for development and the only merit would appear to be to the landowners and developers pockets."</p>	<p>With regard to SA objectives 1: health and well-being, 10: climate change mitigation and 12: air quality, all reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Although the sites listed cover the same or overlapping areas, each has been appraised individually as a reasonable alternative development site option. Chapter 5 and Annex 1 of the Interim SA Report contain an appraisal of each separate site. In the next iteration of the SA Report, there will be a 'Cumulative effects' section. It is the purpose of this section of an SA Report to consider the effects that a plan as a whole will have on an area.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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			<p>SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>With regard to Ancient Woodland, if a site contains or falls within 250m of an area of Ancient Woodland, it receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42651521	Q8 of the questionnaire	<p>"Site 59805 – In terms of objectives 1-4, considerable weight needs to be given to the potential for a site of this scale to deliver new services and facilities which will improve accessibility for new and existing residents in the northern part of the town.</p> <p>For Spatial Objective 5, the delivery of significant biodiversity net gain within the development should be given significant weight. Regarding spatial objective 7, it is not agreed that there will be negative impacts on cultural heritage features.</p> <p>In terms of Objective 8, only very limited parts of the site are outside Flood Zone 1 and these would easily be incorporated into open space within any masterplan for the wider site."</p>	<p>This is a 'policy-off' appraisal and so mitigation such as the delivery of new services and facilities, and subsequent improved accessibility, is not taken into consideration. Each reasonable alternative development site option is appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via a policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>The respondent refers to Spatial Objectives 5 and 7 in the context of site 59805. It is assumed that they are instead referring to SA objectives 5: biodiversity and geodiversity and 7: heritage. As mentioned already, site 59805 has been appraised on a 'policy-off' basis and so consideration has not been given to mitigation.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of a couple of heritage assets, as recorded in the Kent Historic Environment Record. As such, there is potential for development to cause harm to these heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding and contains some water bodies.</p>
38330369	Q8 of the questionnaire	<p>"Ref: 59601</p> <p>Obj. 1 should be (+?) Hadlow medical centre fully subscribed.</p> <p>Obj. 6 Should be (--) Green Belt. Development would negatively impact views of Hadlow Tower and the village conservation area.</p> <p>Obj. 7: Should be (--) Development would negatively impact views of Hadlow Tower and the village conservation area.</p> <p>59605</p> <p>Obj. 10: Should be (-) No footpath or cycle path linking to Hadlow village; the A26 is a fast road and dangerous for pedestrians; residents unlikely to use transport other than private car. Lack of parking space in Hadlow, means residents of the site would use shops further afield.</p> <p>59637</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 6: landscape and townscape, Green Belt is a policy designation and not an environmental or sustainability</p>

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		<p>Obj. 6: Should be (--). Green Belt. Development would negatively affect footpath users' enjoyment of the countryside. For visitors to the Cemetery, it would adversely impact cherished views across the existing countryside to the Grade I listed Hadlow Tower.</p> <p>Obj 7: Should be (--), the site affects the setting of the cemetery, with its Grade II listed war memorial.</p> <p>Obj 8: Should be just (--). site prone to flooding; run-off from any development could affect the health of the nearby pond.</p> <p>Obj 10: Should be (-). No cycle paths around Hadlow and between Hadlow and Tonbridge.</p> <p>59638</p> <p>Obj 1: Should be (-) The junction of the access road with the A26 is dangerous due to poor visibility and the speed of traffic using the A26.</p> <p>Obj 5: Should be (--): the location of the site next to the pond would impact the quality of the water in the pond and the wildlife that use it.</p> <p>Obj 6: Should be (--): Green Belt. Development would adversely impact the rural setting of the pond.</p> <p>Obj 10: Should be (-): No cycle paths around Hadlow and between Hadlow and Tonbridge.</p> <p>59647 Obj 1: Should be (+?): the Hadlow medical centre is over-subscribed with no room for expansion.</p> <p>Obj 6: Should be (--): site is Green Belt. Traffic from any development of that size would cause unacceptable congestion on Court Lane and at the narrow junction with the A26.</p> <p>Obj 10: Should be (-): No cycle paths around Hadlow and between Hadlow and Tonbridge.</p> <p>59659 & 59686</p> <p>Obj 1: Should be (+?): Hadlow medical centre is over-subscribed with no room for expansion. Dangerous junction with A26.</p> <p>Obj 6: Should be (-) Green Belt.</p> <p>Obj 10: Should be (-): No cycle paths around Hadlow and between Hadlow and Tonbridge.</p> <p>59776</p> <p>Obj 1: Should be (--): Carpenters Lane unsuitable for the increased traffic from the development: this would impact the well-being of local residents. The junction with the A26 would be dangerous with the increased traffic turning on to the main road. The local medical centre is over-subscribed with no room for expansion.</p>	<p>designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>All effects against SA objective 7: heritage are recorded as uncertain. As stated in the site assessment criteria (Appendix D of the Interim SA Report), "Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development sight and nearby heritage assets".</p> <p>Sites 59605, 59638 and 59686 receive minor positive effects in relation to SA objective 10: climate change, as they are more than 800m from a railway station but within 400m of a bus stop.</p> <p>Site 59776 receives a minor negative effect in relation to SA objective 10, as it is more than 800m from a railway station and more than 400m from a bus stop and cycle route.</p> <p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal are measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking are likely to be greater.</p> <p>With regard to site 59637, heritage is considered under SA objective 7, not SA objective 6. The site is recorded as having an uncertain significant negative effect in relation to SA objective 7, as it is within 250m of a heritage asset. Site 59811 is also recorded as having an uncertain significant negative effect in relation to SA7. All effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to site 59637 and SA objective 8: water, the site receives a significant negative effect already.</p> <p>With regard to the respondent's comment on site 59638 and the fact its next to a pond, the site is recorded as containing this pond under SA objective 8. The presence of the pond is not considered a landscape issue.</p> <p>Site 59842 receives an uncertain significant negative effect for the reasons outlined in the proforma. The uncertainty relates to the fact that the extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design.</p> <p>A map showing the location of site 59795 can be found at the top of its proforma. Although the site may not look as though it comprises brownfield land, TMBC has informed LUC that it does.</p> <p>TMBC also informed LUC that site 59853 comprises brownfield land.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, all adverse effects are recorded as uncertain. As stated in the proforma for site 59859, it may be possible to conserve or even enhance the biodiversity or geodiversity asset through the design and layout of new development.</p>

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		<p>Obj 6: Should be (--). Green Belt. Development would adversely impact the setting of Williams Field, the main open space in the village.</p> <p>Obj 10: Should be (-)/(-) depending on the exit points from the development. No cycle paths around Hadlow and between Hadlow and Tonbridge.</p> <p>59795</p> <p>Obj 6: Uncertainty as to location site. TMBC map shows site as Green Belt field with trees.</p> <p>Obj 9: Uncertain whether site is brownfield land. see above</p> <p>59811</p> <p>Obj 1: Should be (--) the well-being of Hadlow residents would suffer from a large amount of increased traffic. Hadlow is where traffic from the site would access the A26 increasing congestion in Carpenters Lane and at the junction with the A26.</p> <p>Obj 6: Should be (--). Green Belt, part of historic Oxon Hoath estate and crossed with footpaths affording sweeping views across the countryside to the Grade 1 listed Hadlow Tower and beyond.</p> <p>Obj 7: Should be (--). Site surrounds the historic grade II listed Oxon Hoath.</p> <p>Obj 10: Should be (--). No public transport or cycle paths means all journeys will be by car.</p> <p>59853</p> <p>Obj 1: Should be (--?): Increased traffic and congestion on Court Lane and at the narrow junction with A26.would adversely affect the residents' well-being. Victoria Road also unsuitable for increased traffic. No cycle/foot paths and distance from Hadlow would mean residents using cars rather than walking. Medical centre full: no room for expansion.</p> <p>Obj 9: Should be (-). Only about 50% of the site is brownfield. The rest is grass with some under cultivation.</p> <p>Obj 10: Should be (-) Most of site more than 400m from bus stop.</p> <p>59842</p> <p>Obj. 1: Should be (--): Size of the site would adversely impact Hadlow residents' well-being due to congestion and pollution from increased traffic in the village centre. Medical centre full.</p> <p>Obj 6: Should be (--?): Site lies between two well-used footpaths and any development would adversely impact walkers' enjoyment of the countryside.</p>	<p>There is no site with the ID 59659.</p>

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		<p>Obj 8: Should be (--): Site prone to flooding, also has valuable role in absorbing run-off from fields to the north, helping prevent flooding of Hadlow village - particularly of homes on Maidstone Road. Development would affect the water quality of the two streams on site that feed into the Bourne.</p> <p>59859</p> <p>Obj 1: Should be (--?): Access on to Carpenters Lane is on a dangerous bend with poor visibility.</p> <p>Obj 5: Should be (--): site would impact biodiversity of the river Bourne, particularly due to flooding of the site.</p> <p>SA Obj 8: Should be just (--?) Site is flood plain and prone to flooding. Run off will adversely impact the quality of water in the Bourne."</p>	
42387809	Q8 of the questionnaire	<p>"59595 SA2 ver1105oesn't1105y1105y1105yability Site is on very narrow lane in a hollow, already fairly dangerous. No safe way to walk or cycle to any transport or services so 2 cars/family needed. No way to make safe access onto Matthews Lane. SA Objective 3 says within 800m of school - site is more than 2km from either of the closest schools. It is classed as brownfield but is actually disused farm.</p> <p>59597Site surrounds old farm buildings, now houses. SA2: Access onto Mereworth Road already dangerous as blind bend adjacent to dangerous junction (many accidents at junction) and road very narrow. Although there is an hourly bus to Tonbridge and Maidstone nearby it is infrequently used as inconvenient for most purposes and most households would need to have 2 cars, increasing pollution and congestion.</p> <p>SA 7: Yotes Court house and environs of cultural interest and beauty.</p> <p>59598 SA2: Access is onto 7 Mile Lane B2016 at a point which is already an accident black spot with speeding vehicles on a straight road with deceptive dips and a crossroads adjacent to a school where there are frequent accidents.</p> <p>59747 SA 14: 100 houses in this area would be totally out of character with the local area; the nearest village only has about 50 houses.</p> <p>59750 SA6: 800 houses in this area would be totally out of character with the local area; it is many times more houses than the nearest villages combined.</p> <p>59752 SA6 : this vast site would dwarf the village of Mereworth and join it with Kings Hill as one urban sprawl.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>As stated against SA objective 2: services and facilities in the proforma for site 59595, it falls within the Poor Accessibility Band. Therefore, it receives a significant negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the proforma states that the site is more than 800m of an existing secondary school and a primary school.</p> <p>Site 59597 is recorded as having a minor negative effect in relation to SA objective 2 and an uncertain significant negative effect in relation to SA objective 7: heritage. Please refer to the proforma for the reasons why.</p> <p>Site 59598 is recorded as having a significant negative effect in relation to SA objective 2. Please refer to the proforma for the reasons why.</p> <p>Site 59747 receives a significant positive effect in relation to SA objective 14: housing, as it has capacity to accommodate 100 dwellings or more. The respondent's comment relates more specifically to the landscape, which is covered under SA objective 6: landscape and townscape. The site is recorded as having an uncertain significant negative effect in relation to SA objective 6.</p> <p>With regard to site 59750, it receives an uncertain significant negative effect in relation to the landscape (SA objective 6) for the reasons outlined in the proforma.</p> <p>With regard to site 59752, it receives an uncertain minor negative effect in relation to SA objective 6 for the reasons outlined in the proforma.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>59811: This vast site would effectively create a New Town in a very rural area. Being on rising land from the Bourne Valley up to the top of the Greensand Ridge, this greenfield site is highly visible for many miles across the Borough and into Sevenoaks Borough.</p> <p>All the SA items, with the exception of SA14, providing more housing can only have strong negative effects.</p> <p>The road infrastructure is inadequate being small country lanes. If the A26 were upgraded to take a development of this size (and where would that money come from?) this would create even more problems towards Tonbridge or Maidstone as the A25 is already frequently blocked with traffic.</p> <p>SA1 and 2 There are no schools or medical facilities, within several miles and those are oversubscribed.</p> <p>SA 5,6,7,8,9,10,12 All environmental aspects will be significantly degraded as the area is currently a beautiful greenfield area, surrounded by ancient woodland at the north end.</p> <p>SA 14 In this area, it can be expected that most households would need 2 cars as the distance to schools, shops, places of work, train stations etc is large and public transport virtually non- existent and unlikely to be significantly improved in the foreseeable economic climate. The need for private transport or the high cost of public transport should it ever emerge would preclude lower income families from living on this development, making yet another vast estate for the well off with little gain in genuinely affordable housing."</p>	<p>With regard to site 59811, it receives an uncertain significant negative effect in relation to SA objective 6 for the reasons outlined in the proforma.</p> <p>The proforma for site 59811 states that "The site is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both)". Specifically, the site is within 800m of an existing area of open space/walking and cycle path/play area/sports facility.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>Site 59811 is recorded as having a significant negative effect in relation to SA objective 2: services and facilities, as it falls within the Poor Accessibility Band.</p> <p>The site is already recorded as having uncertain significant negative effects in relation to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape, 7: heritage, 8: water and 9: soils. The reasons are outlined within the proforma. The site is recorded as having a minor negative effect in relation to SA objective 10: climate change mitigation, as it is more than 800m from a railway station and more than 400m from a bus stop and cycle route. A negligible effect is expected in relation to SA objective 12: air quality, as the site is not within 100m of an AQMA.</p> <p>SA objective 14 relates specifically to housing provision, not transport. Transport is addressed separately under SA objective 10: climate change mitigation. Site 59811 receives a minor negative effect in relation to S10, as it is more than 800m from a railway station and more than 400m from a bus stop and cycle route. This is acknowledged in the proforma for the site.</p>
25401729	Q8 of the questionnaire	<p>"Sites 59720, 59608, 59871, 59793, 59709, 59872, 59770, 59830 are not suitable because they are in greenbelt and or AONB and would cause harm to the greenbelt AONB. In relation to 59830, in contravention of NPPF, it would create urban sprawl and not prevent the villages of Ightham and Borough Green from merging. For many or each of the sites above in Ightham we have the following comments:</p> <p>SA Objective 1:</p> <p>There is no capacity in the local GP surgery to absorb the potential increase in numbers for this size of development, it is already difficult to get an appointment.</p> <p>SA Objective 2:</p> <p>Public transport links in Ightham and Ivy Hatch are severely limited. Recent cuts to local bus services make it difficult for some school children to access schools allocated to them. The traffic on the A227 and A25 is often at a standstill into Sevenoaks and Borough Green. Further development would put unacceptable pressure on the A</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The Green Belt is separate to the AONB. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Consideration is given to the AONBs within the Borough under SA Objective 6: landscape and townscape. If a site is within 500m of either AONBs, it is recorded as having an uncertain significant negative effect in relation to SA6.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>roads and the narrow country lanes in the villages of Ightham and Borough Green.</p> <p>SA Objective 3:</p> <p>The primary and secondary schools in Ightham and Borough Green are currently full or oversubscribed.</p> <p>SA Objective 4:</p> <p>We not able to determine at this point in the planning process.</p> <p>SA Objective 5:</p> <p>The sites within AONB (and close to a SSSI) and development would have a negative effect on the biodiversity of both of these designated areas.</p> <p>SA Objective 6:</p> <p>Development will have a detrimental effect on the local character and distinctiveness of the historic villages of Ightham and Ivy Hatch. It will result in the coalescence of Borough Green and Ightham. It will result in the loss of 'green space' and will have a harmful effect on the Kent Downs AONB and impact on the openness of the Green Belt.</p> <p>SA Objective 7:</p> <p>Some sites are close to the Heritage asset of Ightham Court protected as an Historic Park and Garden, Ightham Mote (Scheduled Monument) and the Conservation Areas in Ightham and Ivy Hatch.</p> <p>SA Objective 8:</p> <p>Some sites are within the flood zone</p> <p>SA Objective 9:</p> <p>This development on a greenfield (currently agricultural) site would adversely impact the soil quality and contribute to land contamination.</p> <p>SA Objective 10:</p> <p>The distance from a railway station and the poor bus links would result in increased traffic movements and therefore are likely to increase greenhouse gas emissions.</p> <p>SA Objective 11:</p> <p>Not quantifiable at this stage in the planning process.</p> <p>Objective 12:</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The effects recorded against SA objective 2: services and facilities were informed by the accessibility band each site falls within, as identified in the Urban Capacity Study.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 5: biodiversity and geodiversity gives consideration to biodiversity and geodiversity assets. The AONBs are dealt with separately under SA objective 6: landscape and townscape, as AONB is a landscape (not a biodiversity/geodiversity) designation.</p> <p>SA objective 6: landscape and townscape gives consideration to the landscape and townscape, not the historic environment. This includes whether a site comprises open space or not. The historic environment is dealt with separately under SA objective 7: heritage.</p> <p>With regard to SA objective 7: historic environment, all sites listed are recorded as having uncertain significant negative effects in relation to the historic environment. All effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, sites that fall within Flood Zones 3 and 2 receive significant negative and minor negative effects, respectively.</p> <p>With regard to SA objective 9: soils, sites that comprise greenfield land receive negative effects, the significance of which depends on the Agricultural Land Classification.</p> <p>With regard to SA objective 10: climate change mitigation, consideration is given to the proximity of sites to railway stations, bus stops and cycle paths.</p> <p>With regard to SA objective 12: air quality, sites within 100m of an AQMA receive a significant negative effect.</p> <p>SA objective 13: material assets gives consideration to Minerals Safeguarding Areas.</p> <p>SA objective 14 relates to housing delivery, not the historic environment or landscape. In the SA, sites 59720, 59709 and 59830 are recorded as having uncertain significant negative effects against SA objectives 6: landscape and townscape and 7: historic environment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Developments close to the AQMA in Borough Green will result in increased traffic movements which will adversely impact the air quality in this area.</p> <p>Objective 13: All sites are within a mineral safeguarding area.</p> <p>Objective 14: 59720, 59709, 59830 are wholly unsuitable in size and position, on the edge of the historic village of Ightham/Ivy Hatch and will result in the loss of the green wedge between Ightham and Borough Green. In particular the scale of 59830 will significantly and adversely impact the community, will create urban sprawl and have a detrimental effect on this small historic rural settlement."</p>	<p>The SA must give consideration to all reasonable alternative development site options.</p>
42804513	Q8 of the questionnaire	<p>"Site 59806. The site assessment takes no account of the scale of proposed development. 3,289 dwellings is a new town, and would require considerable additional infrastructure to support i-. SA1 - it is a significant negative impact on health as a new health centre and GPs would need to be-found - the current health centre in Hadlow could not cope with triple the number of current patient-. SA3 - educational attainment; yes, there are two schools nearby but there would need to be a new primary school to serve the development. SA10 It is described as a minor negative that there is no railway station anywhere nearby and a single bus stop on the main road. This is a significant ne-ative - a frequent new bus service would be needed as a minimum, and there would be a significant increase in car journeys on the already congested A26 at Hadlow- SA14 - the number of dwellings proposed is a significant positive but I would question the suitability of such a large site, remote from employment and public transport, for affordable housing.</p> <p>This site does not fit with the conclusions of the sustainability appraisal to opt for smaller scale developments on the fringes of urban centres.</p> <p>Site 59811. The site assessment takes no account of the scale of proposed development. 2,362 dwellings is a new town, and would require considerable additional infrastructure to support i-. SA1 - it is a significant negative impact on health as a new health centre and GPs would need to be-found - the current health centre in Hadlow could not cope with 2.5 times the number of current patient-. SA3 - educational attainment; yes, there are two schools nearby but there would need to be a new primary school to serve the development. SA10 Access issues are a significant negative; a new access road would be needed as Carpenters Lane would not be able to cope with the volume of traffic. A frequent new bus service would be needed as a minimum, and there would be a significant increase in car journeys on the already congested A26 at Hadlow- SA14 - the number of dwellings proposed is a significant positive but I would question the suitability of</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, site 59806 is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an open space and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 2: services and facilities, the proformas for both sites acknowledge that neither is within 800m of an existing secondary school or primary school. Therefore, both receive an uncertain minor negative effect in relation to this objective. The uncertainty acknowledges the fact that the provision of new residential development could stimulate the provision of new schools and/or school places, although this cannot be assumed.</p> <p>In line with the site assessment criteria, a site receives a minor negative effect under SA objective 10: climate change mitigation if it is more than 800m from a railway station and 400m from a bus stop.</p> <p>With regard to SA objective 14: housing, the site receives a significant positive effect because it will deliver a significant number of new homes. The SA acknowledges under SA objective 2: services and facilities that the site falls within the Poor Accessibility Band. For this reason, the site receives a significant negative effect in relation to SA2. The SA also acknowledges that the site is more than 800m from a railway station and more than 400m from a bus stop and cycle route. Therefore, it receives a minor negative effect in relation to SA objective 10: climate change mitigation. The site receives a negligible</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>such a large site, remote from employment and public transport, for affordable housing.</p> <p>This site does not fit with the conclusions of the sustainability appraisal to opt for smaller scale developments on the fringes of urban centres."</p>	<p>effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities.</p>
42723393	Q8 of the questionnaire	<p>"Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which do not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community.</p> <p>Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone will not only reduce the suitability of the areas for development. It reduces the area available for development and will have an impact on the future sales value of properties built in it"</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>
42829313	Q8 of the questionnaire	<p>"KWT has not had the capacity to undertake a detailed assessment of all site allocations included within Annex 1. We have provided commentary below on a number of major development sites, focusing</p>	<p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain. As outlined in the site assessment criteria contained within Appendix D of the Interim SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>solely on SA Objective 5: To protect and enhance biodiversity and geodiversity.</p> <p>There are number of sites proposed around Eccles and Holborough, some of which KWT are commenting on at planning application stage and/or liasing with the developer regarding impacts. These include (but is not limited to) 59851, 59847, 59684, 59826 and 59864. Cumulative impacts of these schemes on sensitive wildlife sites should be considered. It mitigating for these proposals it is recommended that relevant policies require the long term management of the Local Wildlife Sites in this area.</p> <p>We feel that the presumed uncertainty of negative impacts is misleading. Where designated sites fall within the red line boundary for a site then negative impacts should be assumed. Without further detail being included within the Site Assessments it is not reasonable to assume that impacts will be avoided or mitigated. We advise that designated wildlife sites are excluded from the red line boundaries, however these could be included within a wider blue-line boundary for the express purpose of bringing the Local Wildlife Site into long term management. It is essential that a substantial buffer zone be included from the outset of scheme design.</p> <p>This presumed uncertainty of negative impacts is a common thread that runs throughout the assessment of sites. Other examples include the assessment for 59861. Dog Kennel Wood Ancient Woodland are uncertain at this stage. Further detail is required to decrease the certainty of a negative impact on biodiversity, and would require the east of the site to be allocated through this plan for biodiversity enhancements. Without such commitments there will be severe fragmentation of habitats and isolation of this ancient woodland.</p> <p>In addition, KWT would be very concerned is 59646 were progressed due to the presence of East Peckham Ponds LWS which forms part of a biodiversity corridor along the River Medway. It is not considered that the negative impacts can be assumed as "uncertain" at this stage. This site would represent a prime location for the creation of an off-site BNG scheme.</p> <p>The comments made above apply to a number of other sites and we suggest that all assessments under Objective 5 are re-considered on the basis that mitigation of impacts cannot be assumed."</p>	<p>Report, "Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application".</p>
42722081	Q8 of the questionnaire	<p>"59877- I object to this site being used for development.</p> <p>Objection 1- This says it is within an 800M site of a medical centre and sports facility as positives. There is no information about how capacity at the medical centre would be increased so this would just add another strain on an already very busy service- it CANNOT be declared a positive.</p> <p>Objection 3- in regards to local schools. Kent's own published data (/www.kent.gov.uk/_data/assets/pdf_file/0009/126774/Guide-to-applying-to-Primary-in-Kent.pdf) shows that both local primary</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, consideration is given to accessibility and not the capacity of medical centres (and sports facilities), which is a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>schools (Borough Green Primary and Ightham Primary) were both fully subscribed in the most recent year, so I think it would be reasonable to assume that there would not be capacity at these for more applications. Therefore proximity to these schools is not a positive. It is a NEGATIVE as local people will have more difficulty as they compete with more families for the same number of school places. If you are going to remedy this by building a new school- this could be done anywhere.</p> <p>Objection 5 and 6- these are SIGNIFICANT NEGATIVES. This is an areas of established woodland with orchids, lots of species of birds, wildflowers.</p> <p>These areas need to be preserved. Turning them into a building site would have a huge negative effect of the environment.</p> <p>Objection 8- you should not be considering building houses in any flood risk area. The effect on climate change is accelerating and this risk will only increase.</p> <p>Objection 5 and 6- these are SIGNIFICANT NEGATIVES. This is an areas of established woodland with orchids, lots of species of birds, wildflowers.</p> <p>These areas need to be preserved. Turning them into a building site would have a huge negative effect of the environment.</p> <p>Objection 8- you should not be considering building houses in any flood risk area. The effect on climate change is accelerating and this risk will only increase.</p> <p>Objection 14- Large sites are not a positive. They put a huge strain on local amenities. There is no reason why a smaller development should not contain affordable housing- that is completely down to the developer's plan.</p> <p>Site 59843- I object to this site being used for development.</p> <p>Objection 1- This says it is within an 800M site of a medical centre and sports facility as positives. There is no information about how capacity at the medical centre would be increased so this would just add another strain on an already very busy service- it CANNOT be declared a positive.</p> <p>Objection 3- in regards to local schools. Kent's own published data (/www.kent.gov.uk/_data/assets/pdf_file/0009/126774/Guide-to-applying-to-Primary-in-Kent.pdf) shows that both local primary</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The site receives significant negative effects in the SA against SA objectives 5: biodiversity and geodiversity and 6: landscape and townscape. All adverse effects against these objectives are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect in relation to this objective.</p> <p>SA objective 14 relates to housing delivery only and so if a site is likely to deliver a significant number of new homes, it will receive a significant positive effect in relation to SA14. Sites that deliver fewer than 100 dwellings receive a minor positive effect in relation to this objective.</p>

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		<p>schools (Borough Green Primary and Ightham Primary) were both fully subscribed in the most recent year, so I think it would be reasonable to assume that there would not be capacity at these for more applications. Therefore proximity to these schools is not a positive. It is a NEGATIVE as local people will have more difficulty as they compete with more families for the same number of school places. If you are going to remedy this by building a new school- this could be done anywhere</p> <p>Objection 5 and 6- these are SIGNIFICANT NEGATIVES. This is an areas of established woodland with orchids, lots of species of birds, wildflowers.</p> <p>These areas need to be preserved. Turning them into a building site would have a huge negative effect of the environment.</p> <p>Site 59748 I object to this site being used for development.</p> <p>Objection 1- This says it is within an 800M site of a medical centre and sports facility as positives. There is no information about how capacity at the medical centre would be increased so this would just add another strain on an already very busy service- it CANNOT be declared a positive.</p> <p>Objection 3- in regards to local schools. Kent's own published data (/www.kent.gov.uk/_data/assets/pdf_file/0009/126774/Guide-to-applying-to-Primary-in-Kent.pdf) shows that both local primary schools (Borough Green Primary and Ightham Primary) were both fully subscribed in the most recent year, so I think it would be reasonable to assume that there would not be capacity at these for more applications. Therefore proximity to these schools is not a positive. It is a NEGATIVE as local people will have more difficulty as they compete with more families for the same number of school places. If you are going to remedy this by building a new school- this could be done anywhere</p> <p>Objection 5 and 6- these are SIGNIFICANT NEGATIVES. This is an areas of established woodland with orchids, lots of species of birds, wildflowers.</p> <p>These areas need to be preserved. Turning them into a building site would have a huge negative effect of the environment."</p>	
42039457	Q8 of the questionnaire	<p>"Site 59737</p> <p>SA Objective 5 – Significant negative effect is likely. Development of the site would have an adverse impact on several clusters of mature trees with TPOs."</p>	Site 59737 already receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42688225	Q8 of the questionnaire	<p>"Site 59799</p> <p>SA Objective 6: This site IS located near a settlement in a rural location and development of ANY kind would have a significant negative impact on residents already residing, whether homeowners or private tenants.</p> <p>SA Objective 7: Never mind ""lines of site between the development site and nearby heritage alts"".... what about the ACTUAL residents who also do not want to have their line of site ruined?!! This is a conservation area and we moved here because we believed there would be no danger of major development.</p> <p>SA Objective 14: This site would be devastated if ANY major building work took place. Gaining access for plant machinery would change the face of the landscape irreparably not to mention the complete and utter disruption to the lives of those already residing. Roads will only tolerate single line traffic, giving way is the norm but this is regarded as an advantage by locals!! So to suggest that ""this site would be expected to provide fewer than 100 dwellings"" and describe that as a Minor positive is an extremely alarming prospect for the community living here.</p> <p>The exact same comments apply to the following two sites</p> <p>Site 59623 and particularly Site 59624. These are sites which utilise the same access roads as site 59799 and involve the same community. To suggest that Site 59624 ""would be expected to comprise 100 dwellings or more"" is again a totally terrifying prospect for existing residents and would transform the landscape with the most negative outcomes for all concerned."</p>	<p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Sites receive an uncertain minor negative effect when they are located on the edge of a settlement. Although the respondent has raised the point that the site is located on the edge of a settlement, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct (uncertain significant negative). In the next iteration of the SA Report, we will add this limitation to the 'Difficulties and Data Limitations' section of the report.</p> <p>The site also already receives an uncertain significant negative effect in relation to SA objective 7: heritage.</p> <p>SA objective 14 relates to housing delivery only. If a site is likely to deliver 100 homes or more, it will receive a significant positive effect in relation to SA14. If a site is likely to deliver fewer than 100 dwellings, it will receive a minor positive effect.</p> <p>Site 59799 receives different effects across all fourteen SA objectives. With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect. The SA must give consideration to all reasonable alternative development site options.</p>
42719137	Q8 of the questionnaire	<p>"Similar to question 7. Annex 1 is 1101 pages with 347 sites each with assessments of the 14 objectives. In addition the sites are neither grouped by area or in chronological order and there is no search function making it very difficult to answer these questions. Even for the 17 sites we have found so far that we do have objection to, the max 6000 characters in this space is not sufficient to answer the question fully. An additional complication is that I agree with some of the assessments whilst disagreeing with others. I will give an example:</p> <p>Site 59424:</p> <p>Objections: DEFRA Forest Inventory, ancient woodland and TPO protected trees. Overdevelopment and lack of resources at Kings Hill, harm to protected species, outside of the confines of existing developments, impact on local residences of main access, impact on wildlife corridor.</p> <p>Objective 1 a--essment - I do not agree that removing trees, which would worsen air quality, would be a ++ for human health and wellbeing. In addition, many people use the woods for walking and relaxing, again, building 164 houses in their place is not something I consider positive for human health and wellbeing when there are</p>	<p>The unique ID numbers are how the sites are referred to throughout the Local Plan and so names for each site have not been provided. In the next iteration of the SA Report, the proformas will be structured by ward and a Contents page provided.</p> <p>The site has been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.Site 59424 receives a negligible effect in relation to SA objective 2: services and facilities for the reason provided in the proforma.</p> <p>Site 59424 is recorded as having an uncertain significant negative effect in to SA objective 5: biodiversity and geodiversity, as it is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. This includes Ancient Woodland. It is highly unlikely that any Ancient Woodland would be lost to development. All negative effects against this SA objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides</p>

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		<p>already urban areas that are better resources and suited to such development</p> <p>Ob-ective 2 - Is not a negligible effect as access to community facilities e.g. main line train station is either car (emissions), bus (infrequent) or 1114oesn'tng (approx. 55mins if you are relatively fit)</p> <p>Ob-ective 5 - How can it be an uncertain negative on biodiversity if you chop down a load of ancient woodland</p> <p>Obj-ctive 12 - I agree that it would have a significant negative effect on air quality.</p> <p>This has covered just 4 objectives on one site, I could continue further with this site and cover the other 10 objectives, making comment on each if necessary, but I know I would run out of characters long before I covered the 17 sites I want to comment on, let alone all the others.</p> <p>I will list the 17 sites I object to below and send a separate paper copy to TMBC which detail the objections.</p> <p>59424, 59531, 59534, 59544, 59547, 59630, 59631, 59634, 59655, 59740, 59761, 59752, 59762, 59797, 59800, 59802, 59884"</p>	<p>an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p>
42342977	Q8 of the questionnaire	<p>"Site 59847 This is largely the correct site for th1114oesn't1114y1114yopportunity in the 2007 plan and this is a Brownfield site however parts of it are covered by a jungle of Old Mans Beard weed and is an ideal Nightingale habitat. Remember Chattenden Woods. At SA 10 there is a statement that it is within 800m of a railways station however that is as the crow flies. One must cross the Medway on the bridge a journey of about 1500m to from the nearest tip of the site.</p> <p>Sites 59791 & 59792 These sites are adjacent to the village of Wouldham it is a poor village1114oesn't1114y ameniteis and a village hall that needs replacing. It does not own its recreation ground or its allotmanets and the latter are being built over in this application. To raise SA 2 to a reasonable level this site needs to deliver a village hall, fully prepared new allotments to replace the old ones and these together with the recreation ground need to be firmly under the parish councils control and ownership and not a management company created by the developer. SA6 the landscape effects of this site will need very careful consideration when viewed from about 5 miles of the Kent Down ANOB. In SA10 there are bus stops but no local buses except school buses.</p> <p>59787. SA 4 there are two bus stops here but no buses except school buses. Parking is a problems here and so considering off street parking will be required. The cycle way runs along side New Court Road the other side of the village and goes from Bell Lane in Burham about a kilometre to Margetts Lane. SA6 This site is in a very prominent knoll just below the ANOB. On the knoll on the other side of Rochester Road is a terrace of old houses built circa 1920 that are</p>	<p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>With regard to SA objective 2: services and facilities, sites 59791 and 59792 are recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. Therefore, both sites receive a minor negative effect in relation to SA2.</p> <p>With regard to SA objective 6: landscape and townscape, these are 'policy off' appraisals and so do not take into consideration mitigation, such as landscaping. Sites 59791 and 59792 receive uncertain significant negative effects in relation to SA6.</p> <p>With regard to SA objective 4, this concerns economic growth. SA objective 10: climate change mitigation deals with sustainable transport separately. Site 59787 is recorded as falling within 400 of a bus stop.</p> <p>Sites 59787, 59818 and 59819 receive uncertain significant negative effects in relation to SA objective 6: landscape and townscape for the reasons provided in their proformas. The proformas acknowledges that the sites are within 500m of the AONB.</p> <p>Sites 59784 and 59819 receive significant negative effects in relation to SA objective 9: soils, as they are greenfield and contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>The SA acknowledges already that site 59820 comprises brownfield land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>very prominent all across when gap where the Medway goes through the North Downs and from the surrounding ANOB for about 4 or five miles. The old houses fit well into the scene but it would be difficult to see how any new industrial or housing mix could fit in without degrading this vista.</p> <p>59818. SA 6 Like Site 59787 above there landscape views to consider here. SA 13 indicated mineral conservation issues. The site was close to exhausted about 80 years ago and has been an uncontrolled waste tip for about half that time and controlled until finally capped about 10 years ago.</p> <p>59784. SA9 My prime concern with this site is the loss of a very large commercially viable field of high grade farm land that is irreplaceable.</p> <p>59819. SA6 this site is not as visible in the landscape as others and there are good views through road of New court road. SA 9 This links with the land above and my comments there have less weight here as a considerable part of the land above is still available as a commercially viable field.</p> <p>59820. This is a Brownfield site right up to the river and is a natural extension to Peters Village. I am not certain but I think it was the site of the original Wouldham Hall Cement Works."</p>	
42720577	Q8 of the questionnaire	<p>"I disagree with the findings and methodology of the individual site assessments.</p> <p>Sites 59830, 59707/59731, 59880 and 59881 have been assessed as either significant or minor positive for SA Objective 1, 'to improve human health and well being'. This has been decided on the premise that the site is within 800m of an existing healthcare facility. However, existing health and social care services are overstretched, and there is no indication of how the sites would be developed to accommodate the additional demand on these services.</p> <p>These sites have also been assessed as significant positive for SA Objective 3, 'to improve levels of educational attainment ...', because they are within 800m of a school. The schools however are currently at full capacity and again no indication is given as to how the schools would accommodate the additional intake resulting from development of these sites.</p> <p>It is equally concerning that these sites have been assessed as either significant or minor positive for SA Objective 10, 'reduction in greenhouse gas emissions'. This assessment appears to have been decided on the basis of the sites being within 400m of a bus stop or 800m of a railway station. Surely a more thorough examination of the potential reduction in greenhouse gas emissions is required.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for</p>

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		<p>In the case of Site 59830, the proposed development is of the order of 3000 homes, yet the site is rated 'significant positive' on the basis that part of the site is within 800m of Borough Green railway station. Trains travelling from this station are already at capacity during peak periods, and many commuters from this area drive to Sevenoaks to use the train services to Charring Cross and London Bridge.</p> <p>Regarding SA Objectives 6 and 7, it is disingenuous to suggest that the negative impact on the landscape of building on Green Belt land near to the ANOB, can be mitigated from a negative to an uncertain negative by design, scale and layout of development."</p>	<p>assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objectives 6: landscape and townscape and 7: heritage, SA is very high-level and the actual effect a site will have on these two objectives will depend in part on the design, scale and layout of development, which will be determined at planning application stage.</p>
42835105	Q8 of the questionnaire	<p>"59745 Site north of Hilden Avenue – 72 Un–ts 59804 - Merging Hildenborough and Tonbridge 59821 – Site North of Oast Road – Mixed Used 59823 – Site North of Oast Road – Mixed U–ed 59808 - Site North of Woodfield Avenue 222 Un–ts 59609 - Little Tr–nch far– - 59612 - Trench farm Yes–No 59625 - Trench F–rm 59746 - Trench f–rm 59683 - Longmead Flood plain and any other sites in –his area - the mapping is very confusing with nlverview... Objective 1: To improve human health and well-being This should be a major negative as the above sites means that a number of areas move further away from greenbelt as the green belt is built on. Objective 4: To encourage sustainable growth should be more negative. The houses are not near the town or the station. It would be much more sustainable to build houses closer to reliable transport links and or using sites in the town. Objective 5: To Protect Biodiversity and GeoDiversity This should be a Major Negative for these sites especially 59745, 59804, and 59808 but this area makes up parts of other sites too. In this locations they are partially wooded, there are ponds, low brush, they are not open fields etc. There is all sorts of wildlife that inhabit these sites. Badgers, Foxes, various small rodents, owls (at least two types), bats, all sorts of insects (multiple butterfly species, dragon flies) Toads, frogs, hedgehogs. We also regularly see woodpeckers, moorhens, kingfisher, heron, various breeds of duck, newts, Jays etc etc. There</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. If a site contains an existing business that could be lost as a result of residential development, it receives a minor negative effect. All mixed use and employment site options are expected to have positive effects on this objective, as they provide opportunities for new jobs.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, all negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, all negative effects are recorded as uncertain, as the actual effects will depend on the design, scale and layout of development, which will be determined at planning application stage.</p> <p>With regard to SA objective 7: heritage, all effects are recorded as uncertain, as the actual effects will depend on factors such as the</p>

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		<p>are very few ares like this in the green belt, especially on the doorstep of town so people can go out and appreciate the biodiversity and wildlife.</p> <p>Objective 6: To protect and enhance the borough's landscape. This should be a major negative as the top five sites will connect Hildenborough and Tonbridge.</p> <p>At the moment from Tonbridge you cannot see the north side of Hildenborough as it is hidden by the brow of the hilden ridge. The top three developments on the list above essentially would mean that the green view from tonbridge will be destroyed and it will remove the gap between the town and the village. Building on fields that until the 1970's were used for hop production.</p> <p>Objective 7: To protect the cultural heritage resource</p> <p>Should be significant negative especially for top four. In this area there are a number of historic farmsteads that have been on maps for hundreds of years.</p> <p>There is the site of an old chandelery, oast houses, farm houses that describe the rural and industrial nature of the Hilden/Tonbridge area. They are able to be walked past on many different walks through the area and surrounding them with new builds will destroy the cultural heritage and the pleasant walks through it for residents.</p> <p>Objective 8: To protect and enhance water features and resources</p> <p>The sites above are on hills that form the catchment area for hildenbrook and the Medway. Both of which flood. At the moment, the run off from these hills is slowed by the presence of vegetation and soil. There is already flood waters that form at the bottom of Hilden Avenue, Hildenborough in heavy rain. The clay soils currently holds significant water but if these are covered in concrete that capacity will be gone and flood risks will increase.</p> <p>All of the above meet the 5 objectives of Metropolitan Green Belt</p> <p>Many of the Sites consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A), the importance of which has been highlighted by recent food shortages. But also land full of nature with multiple species fundamentally reducing biodiversity</p> <p>Many of above have been previously affected and are all at increasing risk of flooding both from fluvial and surface water sources and many are identified as being at huge increased risk as recognised by the strategic flood risk assessment.</p> <p>All will lead to a significant loss of productive agricultural land or land with that potential future use.</p> <p>Longmead plot significantly reduces amenity and facilities for –ublic</p> <p>59745 - significantly increases the traffic on an already congested road with limit access for traffic with only link onto exiting road system is on a blin"</p>	<p>design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, sites are given a significant negative effect if they are entirely or significantly within Flood Zone 2 and/or within an area with a 1 in 30 year risk of surface water flooding. Sites are given a minor negative effect if they are entirely or significantly within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soils, sites are given a significant negative effect if they contain a significant proportion of Grade 1 and/or 2 agricultural land. Sites are given an uncertain significant negative effect if they contain a significant proportion of Grade 3 agricultural land, with the uncertainty acknowledging that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Sites are given a minor negative effect if they contain less than a significant proportion of Grade 1, 2 or 3 agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42615041	Q8 of the questionnaire	<p>"Site 59669</p> <p>SA Objective 1 : up until very recently this site was used for agricultural purposes (animal grazing) and has been cleared of this usage presumably because of potential building purposes.</p> <p>SA Objective 2 : at the moment the only suitable access is from Noble Tree Road which is narrow and busy at peak times with poor visibility at the junctions (especially at the junction with Ringshill). Considerable improvements would be necessary.</p> <p>SA Objective 3 : these are fee paying schools and do not necessarily cater for local residents since pupils travel from other areas to attend.</p> <p>SA Objective 4 : agree that residential sites will not stimulate growth or employment.</p> <p>SA Objective 5 : difficult to see how a residential development could enhance the huge range of wildlife in this particular area. (Deer, birds of prey, bats, grass snakes toads, frogs etc.)</p> <p>SA Objective 6 : definite significant negative. Noble Tree Road is more like a country lane so it is difficult to imagine how the surrounding open green belt</p> <p>Could be enhanced by a residential development.</p> <p>SA Objective 7 : this is an uncertain significant negative.</p> <p>SA Objective 8 : there is standing water on this site. Also the fields are subjected to significant surface water during the winter months with flooding down towards the railway track. For about 6 months of the year there is a stream all the way down towards the railway track which after development would almost certainly increase the possibility of flooding.</p> <p>SA Objective 9 : there is currently no mains drainage for properties adjacent to this site. This is green belt and significant damage could be caused by a residential development.</p> <p>SA Objective 10 : disagree. The amount of emissions both from houses and vehicles will be significant.</p> <p>SA Objective 11 : trees are already being taken down which has a negative effect on climate change.</p> <p>SA Objective 12 : how can air quality be improved with a considerable Increase in the number of car journeys. Not everybody has an electric car.</p> <p>SA Objective 13 : do not understand what a minerals safeguarding area is.</p> <p>SA Objective 14 : present infrastructure not suitable for 100 houses but agree generally about appropriate mix of dwellings."</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, all schools included in the GIS analysis are state schools.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives an uncertain significant negative effect for the reasons provided in the proforma.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 8: water, the site is recorded as not containing a water body or watercourse.</p> <p>With regard to SA objective 9, this objective related to soil not drainage and the Green Belt. The SA is too high-level to give consideration to mains drainage for properties.</p> <p>With regard to SA objective 10, this objective relates to the distance sites are to sustainable transport modes.</p> <p>With regard to trees, this is considered under SA objective 5: biodiversity and geodiversity, not SA objective 11: climate change adaptation.</p> <p>A Minerals Safeguarding Area is defined in the National Planning Policy Framework (NPPF) as "An area designated by minerals planning authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development".</p>
42801633	Q8 of the questionnaire	<p>"Site 59779:</p> <ul style="list-style-type: none"> • Green Belt and the Kent Downs AONB, edge of Shipbourne Conservation Area. 	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in</p>

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		<ul style="list-style-type: none"> • Poor drainage on southern boundary. • Access onto Back lane in close proximity to main access to Shipbourne Primary school. Danger to school children and congestion at pick up and drop off times. • Dangerous junction of Back Lane with the A227. • Bus stop on the A227 currently only provides a school service. • There is an active covenant on this land restricting development. It is therefore undeliverable. <p>Site 59825:</p> <ul style="list-style-type: none"> • Green Belt, Kent Downs AONB, within the Shipbourne Conservation Area. • Very open site. • Dangerous access onto narrow Upper Green Road, or onto Back Lane. • Proposed mixed development on this site is questionable. There is no identifiable need for social housing in Shipbourne. <p>Site 59827:</p> <ul style="list-style-type: none"> • Green Belt, Kent Downs AONB and the edge of the Conservation area. • There are land drainage issues on this site and a watercourse runs along the southern boundary. • There are already issues with sewer overflow across the site. <p>Common to all three sites:</p> <ul style="list-style-type: none"> • All three sites are in the Green Belt and the Kent Downs AONB. If any of these sites were developed, they would be in conflict with GB policy and conflict with the Kent Downs AONB Management Plan which gives advice on how “to conserve and enhance natural beauty” in accordance with the Countryside and Rights of Way (CROW) Act 2000. The village and surroundings are widely valued as a “green lung” north of Tonbridge and extensively enjoyed by walkers & other visitors. New housing estates would erode the attractive character of the area, so SA objective 1 is negative. <p>As there is no effective public transport, every new house would have one or more new cars, significantly increasing traffic and greenhouse emissions (so SA objective 10 is significant negative)</p> <ul style="list-style-type: none"> • Shipbourne Conservation area and the adopted Shipbourne Design Statement set out what is special and important to Shipbourne and clearly indicate how vulnerable Shipbourne is to development. • The village which has no services other than the small primary School, already oversubscribed: it is on a small site so could not be significantly expanded. So no improvement in educational attainment: SA objective 3 is negative. 	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The AONBs are considered under SA objective 6: landscape and townscape. If a site is within 500m of an AONB, it receives an uncertain significant negative effect.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Most of these comments concern mitigation and so relate more to the Local Plan than the SA.</p>

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		<p>All 3 sites are remote from shops, schools, employment so are unsuitable for a mix of dwelling types sizes and tenures, to meet the Borough's housing needs. So SA objective 14 is negative.</p> <ul style="list-style-type: none"> • The junctions at both ends of Back Lane are dangerous and Back Lane experiences speeding traffic. • The village is not on the gas network so the current electricity grid would need upgrading to sustain any new developments in these sites. • Sewerage is also under pressure and overflows are already experienced as mentioned on site 59827. • Provision of water: current systems are inadequate to accommodate new development." 	
42613473	Q8 of the questionnaire	<p>"SA-Objective 2 - Service and infrastructure in the area are already stretched. HTMG is already struggling to cope with the number of patients and with the care home and Oakhill house development going in with no more services being put in is going to push them further, so another 222 properties will mean these will be unsustainable.</p> <p>SA Objective 3: The junior schools are already full, with one of the schools recently refusing to have a second form entry.</p> <p>SA Objective 4: There are very little/no job opportunities in Hildenborough, so this would increase commuting and the impact of emissions.</p> <p>SA Objective 9/10: Berkeley homes used the site to deposit 'clean soil', but this has not been the case; burying building waste, so not helping to conserve and enhance soil resources and guard against land contamination. They deposited the clean soil to save the environment from dies-I emissions - so are they going to remove it again, impacting on the-environment - where will they deposit it this time"</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities, not access to employment opportunities. SA objective 10: climate change mitigation instead gives consideration to things like emissions by looking at the proximity of development sites to sustainable transport links, although the SA acknowledges that the actual use of sustainable transport modes is dependent on people's behaviour. With regard to Berkeley Homes, this comment does not specifically relate to the SA.</p>
42832705	Q8 of the questionnaire	<p>"For any development to meet its sustainability objectives it needs to recognise the environment in which it is being pr1120oesn't \to acheive SA 2. it needs to be recognised that any development between East Malling into West Malling from Mill Street along Claire Lane would require new pavements and lighting so that any new housing would have access to existing community facilities without encouraging additional motor vehicle use (SA10); additional pavements and lighting along Claire Lane would cause damage to a distinct countryside environment impacting wildlife habitat (SA 5 and SA 6) through disruption of wildlife habitats and interruption of ""darksies"" environments; the scale of the developments will materially impact what has been described in the ""East Malling Conservation Study"" as an areas of ""Unspoilt beauty"" and would disturb the distinct, historic characters of East Malling and West Malling villages</p>	<p>It is not clear whether the sustainability objectives the respondent refers to are the SA objectives that comprise the SA framework within the Interim SA Report, or different objectives separate to the SA that developments must meet. The SA is a high-level tool used to identify the likely sustainability effects of a plan, and is one of many factors that feed into the plan-making process. The SA objectives provide a guide for the appraisal of options, be it policy options or site options.</p> <p>The SA is too high-level to consider pavements and lighting. This is instead something that is determined once more specific proposals are developed and submitted as part of a planning application. The SA does, however, give consideration to the landscape and what effects development wil have on the landscape, under SA objective 6: landscape and townscape.</p>

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		<p>Regarding SA 11 and 12: Incomplete ecology impact and air quality surveys need to be completed and associated issues addressed in line with the overall, cumulative impact of changes resulting from proposed development (not on a case-by-case basis) need to be addressed against very localised claims (e.g biodiversity increases in localised developments e.g unqualified/ unquantified 30% increases in biodiversity)</p> <p>Regarding SA 14: Of the proposed developments only a very small proportion are affordable to young buyers in the local demographic"</p>	<p>Biodiversity is addressed under SA objective 5: biodiversity and geodiversity. Information on how sites have been appraised against this objective is provided in Appendix D of the Interim SA Report.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for things like air quality surveys to be undertaken as part of the work. The Council will, however, commission additional evidence on matters including traffic and air quality. SA objective 12: air pollution looks at the distance sites are to Air Quality Management Areas.</p>
42616641	Q8 of the questionnaire	<p>Generally agree on site assessments. But for site 59811, disagree that is positive on Objective 1 (Improve human wealth and well being). It is within 800 metres of a footpath, but not open space or healthcare facility and is inappropriate in respect of 2262 homes in view of appalling access off existing single track road (Matthews Lane)</p>	<p>Site 59811 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of at least one publicly accessible open space and a walking path.</p>
42514977	Q8 of the questionnaire	<p>"Appendix D (non technical summary) seems to outline the objectives not assess the sites. It is only Annex 1 that gives detail for sites. The criteria used are not of equal importance and so it is difficult to give weight to conflicting criteria. Less and more focussed and weighted criteria would have been better.</p> <p>The approach taken seems to have been to include any area of land that might be developed irrespective of practical suitability. This is disappointing and means that we are obliged to review a mass of unsuitable detail.</p> <p>As examples sites 59709, 59720, 59793, 59872 and 59871 vary greatly in size, but the estimated housing is only identified as ',100' or 100+'. This tells us very little to make a detailed comment.</p> <p>However, no consideration is given to existing pressures on infrastructure - a huge weakness of the analysis. e.g. medical facilities available - but already very busy, especially at peak times. School exists but few available places - and only a primary school close. My confidence that the required investment would be made is very low.</p> <p>Road network is not identified as a bottleneck but with larger developments would be a nightmare, eg 59709, 59720. Village would effectively be joined up with the Borough Green urban area. Larger developments should be rejected in small village environments unless there is a very good reason, with supporting infrastructure."</p>	<p>The purpose of the SA is to assess all reasonable alternative development site options, as identified by TMBC.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>
42714529	Q8 of the questionnaire	<p>"59854 I do not agree with rating '++' for SA 10. Greenhouse gas emissions, just because it is 800 m from a rail station. At best it is neutral. New residents will use cars and heating, they cannot do everything by rail.</p> <p>59616 I agree with the findings</p> <p>59620 I agree with the findings</p> <p>59621 I agree with the findings</p> <p>59622 I agree with the findings</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 10: climate change mitigation, the proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based</p>

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		<p>59699 I do not agree with the findings. Any development on this site will have very significant negative impact on : SA6 Landscape quality. This is exceptionally beautiful area of countryside that must not be touched.</p> <p>59740 I agree with most of the findings but disagree with with SA10 reduce greenhouse emissions. Again, new residents will use cars and heating and this will increase greenhouse gas emissions, not decrease."</p>	<p>modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p>
42561377	Q8 of the questionnaire	<p>"Site no. 59770 (The complete lack of detail in this site proposal makes it very difficult to assess. The default position should be rejection until details are pr-vided)</p> <p>Obj1 - the site is on the A25 and cannot be beneficial to-health</p> <p>Obj2 - don't und-rstand</p> <p>Obj3 - on its own, this site would not drive the development of a new school but could overwhelm the existing primary school. It is some miles away from the nearest secondary s-hools.</p> <p>Obj4 - what is the proposed employment development? The site may be near a bus stop but extremely few commuters use it. They nearly all-drive.</p> <p>Obj5 - replacing a field full of sheep with a housing development cannot be good for biodiv-rsity.</p> <p>Obj6 - as fo- obj5.</p> <p>Obj7 - no -omment</p> <p>Obj8 - massive negative. Run-off from the site causes flooding of Rectory Lane at times of heavy rain. It also causes a manhole cover to lift resulting in raw sewage in the road. Increasing the impermeable surface area on the site will exacerbat- this.</p> <p>Obj9 - this is unquestionably agricultural land. It has a flock of sheep - n it.</p> <p>Obj10 - the inhabitants will use cars not -uses.</p> <p>Obj11 - -greed</p> <p>Obj12 - -greed</p> <p>Obj13 - no-idea.</p> <p>Obj14 - as there are no details of the proposal, impossible to assess."</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022), which identified site 59770 as falling within the Fair Accessibility Band.</p> <p>With regard to SA objective 3: education, the site is recorded as falling within 800m of an existing secondary school or primary school but not both. The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Site 59770 is proposed as a mixed-use site and therefore is recorded as having a minor positive effect in relation to SA objective 4: economic growth, as it will create job opportunities.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity and 6: heritage, the site is already recorded as having uncertain significant negative effects against these objectives.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect for the reasons outlined in the proforma. Specifically, the site contains land with a 1 in 30 year risk of surface water flooding.</p>
25408097	Q8 of the questionnaire	<p>"I do not agree with the methodology used by this study. For example the Borough Green Gardens site is treated as a single unit spatially. In reality it is 5 different quarries all at different stages of quarrying. There is no point in ticking a box twice because part of the site is close to a station if the other end of the site is miles away. There is no point in ticking a box because there is a local school when it is obvious that an extra 3,000 families will need multiple new school forms and huge infrastructure that's currently not present.</p>	<p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>It is not the purpose of the SA to quantify the infrastructure required, rather it is used to assess the social, economic and environmental effects of a plan.</p>

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		<p>It would be far better to make a serious attempt to quantify the infrastructure required, including an end to end 'Relief Road', and estimating costs it in order to determine if the proposal is even viable.</p> <p>Can a road be built in time given that the quarries keep extending their time horizon to complete quarrying?"</p>	
42810369	Q8 of the questionnaire	<p>"59795-Residential - this response is predicated on the basis that the site is the site suggested in the document and not the greenfield indicated by the associated map.</p> <p>Agree with TMBC's assessment of the effects of any prospective development on this site except for the following:</p> <p>SA Objective 1: Significant –egative (—) - the site is on a busy cut through route between the A26 and A227 that has poor drainage, no footpaths or verges, no lighting and poorly maintained road edges. The road is hazardous for pedestrian and cycling traffic and therefore the site is inappropriate for such a significant high density residential development with the associated requirements for car parking and car use.</p> <p>SA Objective 3: Minor –egative (-) - 26 additional houses will undoubtedly lead to added need for educational facilities and the concomitant transport load on the road.</p> <p>SA Objective 5: Significant –egative (—) - 26 additional houses with the associated increase in vehicles and household pets will have a significant negative impact on biodiversity in general and local small mammal, bird, reptile and amphibian populations in particular.</p> <p>SA Objective 6: Significant –egative (—) - the sheer scale of the proposals - nearly doubling the housing stock accessing directly onto Ashes Lane - will undoubtedly have a significant negative impact, potentially creating a precedent for substantial infill between the centres of Tonbridge and Hadlow.</p> <p>SA Objective 7: Significant –egative (—) - the scale of any additional development on this site, over and above the existing, will have a significant negative impact by the sheer number of additional buildings, population and vehicles.</p> <p>SA Objective 8: Minor –egative (-) - likely to have a negative impact as Ashes Lane has a consistent drainage problem with large puddles in the road caused by inadequate/poor road construction/maintenance. The additional burden caused by the use of the vehicles owned by 26 additional houses will only exacerbate an existing poor drainage situation.</p> <p>SA Objective 10: Significant –egative (—) - 26 houses on this site will necessitate additional (50+ ?) car use for work, leisure and education undoubtedly increasing emissions.</p> <p>SA Objective 11: Significant –egative (—) - the location of this site, some distance from public transport routes via a dangerous road, will require significant car use.</p>	<p>A map showing the location of site 59795 can be found at the top of its proforma. Although the site may not look as though it comprises brownfield land, TMBC has informed LUC that it does.</p> <p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 1: health and wellbeing relates to the proximity of sites to healthcare facilities, in addition to open space, walking and cycling paths, play areas and sports facilities.</p> <p>With regard to SA objective 3: education, this objective assesses what distance a site is to an educational facility. The SA acknowledges that there is uncertainty regarding the capacity of schools and that the provision of new residential development could stimulate the provision of new schools or school places, but that this cannot be assumed at this stage.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect in relation to this objective. All negative effects recorded against this objective are recorded as uncertain. This is because as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, the site is already recorded as having a significant negative effect in relation to this objective. All effects are recorded as uncertain against this objective, as the actual effects will depend on the design, scale and layout of development, which will be determined at planning application stage.</p> <p>With regard to SA objective 7: heritage, the site is already recorded as having a significant negative effect in relation to this objective. All effects are recorded as uncertain against this objective, as the actual effects will depend on factors such as the design of the development</p>

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		SA Objective 12: Minor –egative (-) - the additional energy/car use will do nothing to protect or improve air quality."	<p>and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site is not recorded as being at risk of flooding.</p> <p>With regard to SA objective 10: climate change mitigation, no sites will have a significant negative effect as this would not be in line with the site assessment criteria. The site received a minor negative effect, as it is more than 800m from a railway station and ore than 400m from a bus stop and cycle route.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, the site is not within 100m of an Air Quality Management Area (AQMA) and so receives a negligible effect.</p>
42707201	Q8 of the questionnaire	<p>"Site 59863:</p> <p>SA1- site is sandwiched between a dual carriageway and a motorway and as such, I have doubts regarding how this placement and proximity to two significant roads will ultimately improve human health and wellbeing if used for housing. Employment use- depends on what exactly is going to go there, but land more suitable for employment use than residential.</p> <p>SA4- area is not serviced by any frequent buses that lead to any significantly populated areas (nearest bus to Maidstone for example, is the 71 from London Road). In addition, I struggle to picture any significant business developments in an area this distant and inaccessible from any established areas.</p> <p>Site 59445- Whilst I agree with the assessment that the site is widely unsuitable, the geography of the site (aka a hole in the ground) makes the site widely unsuitable for any housing anyway. Without spending a massive amount of money filling in a field with a children's playground in it, I cannot see how you can cram a potential yield of 19 houses there.</p> <p>Site 59441/59442: SA6- Any development would result in an effect on the townscape and landscape, so I would disagree with the ""uncertainty"" behind this assessment.</p> <p>Site 59432: SA1- Fail to see how building on what is commonly used as a playing field will constitute a minor positive to improve human health and well-being. In addition it will lead to a decline in the facilities of the already-existing stock of housing and it's residents with regards to health and wellbeing.</p>	<p>The purpose of SA is to assess all reasonable alternative development site options. Site 59863 is proposed for employment development not residential development. It receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an existing area of open space/sports facility or walking/cycle path, which will help meet the recreational needs of employers working at the site.</p> <p>Site 59863 is expected to have a significant positive effect in relation to SA objective 4: economic growth, as it proposes employment development more than 5ha in size. It is also located close to two bus stops, on its western edge.</p> <p>The SA acknowledges that both sites 59445 and 59432 comprise an area of open space that could be lost as a result of development, and therefore both sites receive an uncertain significant negative effect in relation to SA objective 1: health and wellbeing. These effects are coupled with minor positive effects, as both sites are within 800m of a healthcare facility or an existing area of open space/walling and cycle path/play area/sports facility (but not both).</p> <p>With regard to SA objective 6: landscape and townscape, all effects are recorded as uncertain against this objective, as the actual effects will depend on the design, scale and layout of development, which will be determined at planning application stage.</p> <p>With regard to SA objective 3: education, the site is recorded as falling within 800m of an existing secondary school or primary school but not both. The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational</p>

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		SA3- whilst geographically near to a primary school, the limited number of spaces at said primary school will render this assessment invalid. In addition, there is no space in Leybourne itself where a new primary school can be constructed, without the objections to the other sites as listed above."	facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils " [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.
42736321	Q8 of the questionnaire	<p>"Response on Annex B</p> <p>This response relates to site references 59871 (Fen Pond Road). References to Sustainability Appraisal ("SA") Objectives have been abbreviated "SAO".</p> <p>Environmental impact</p> <p>The topography of the site is a very narrow farm track to a small farm field lined by woodland on a significant slope down to the A25 bypass. To replace the existing farmland and woods with a housing site of the scale proposed - more houses than currently line this entire part of Fen Pond Road - would mean very significant changes to the landscape itself in order to create an appropriate site (SAO 5). It would not be possible, as the SA suggests in SAO 5, to conserve or enhance the asset through design - the SAO 5 entry should be updated to account for this and the existing SAO 5 statement should not be considered a relevant consideration for the decision as the impact could only be a significant negative.</p> <p>This development could not be built without losing the entire topography, shape and aspect of the farmland and woods on which it is proposed. It will also reduce the biodiversity and geodiversity, as well as reducing protection of soil resources and the character of the area as a result (SAO 5, 6 and 9). The scale of the site, including by contrast to the scale of the proposal, does not mean design will be able to mitigate these impacts to any meaningful degree.</p> <p>The proposal is extremely close (<250m) to the curtilage of the Grade I listed St Peters Church as well as being on the edge of the Ightham conservation area and is certain to have a negative impact in respect of both (SAO 7) as the essential privacy and tranquility of the churchyard will be significantly reduced by the loss of the farm/woodland buffer to the new development and (as a result of the landscape changes) the A25 bypass.</p> <p>In light of the above, the development would therefore have a materially negative impact on the Green Belt and Ightham as in an Area of Outstanding Natural Beauty.</p> <p>Increased traffic and pollution</p> <p>Access to public transport is extremely minimal in Ightham with a very infrequent bus service from the centre of the village, no cycle paths</p>	<p>Site 59871 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band.</p> <p>With regard to SA objective 3: education, the site has been appraised in line with the site assessment criteria and receives an uncertain minor positive effect due to the fact it is located within 800m of an existing secondary or primary school (but not both). The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown. The site assessment criteria also state "New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added]. This shows that although development could stimulate the provision of new schools or school places, that this has not been a material consideration in the assessments against SA objective 3.</p> <p>SA objective 4: economic growth relates to the delivery of employment opportunities rather than access to employment opportunities. The SA acknowledges that "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect in relation to this objective. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. The same applies to SA objectives 6: landscape and townscape and 7: heritage.</p>

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		<p>and no direct access to trains (SAO 10). As there are no local amenities or business or industrial premises in Ightham aside from the pub (SAO 4) this development cannot be considered to encourage expansion or growth of those objectives. The result of this absence is that most households in Ightham have at least two cars (SAO 2, 12). This proposal is therefore likely to be for around 40-50 cars to be added to this small and already congested area – primarily the Church and the Close section of Fen Pond Road, which is part of the Conservation Area and essential for the church community.</p> <p>Specific impact on the Close (Conservation Area)</p> <p>Unless each new dwelling were to be assigned two parking spaces plus guest parking in the new development, which seems very unlikely given how small the space is - including for the number of proposed dwellings, the overflow parking will have to spill-over into the Close and Fen Pond Road. This is already the case, and was clearly underestimated for, the development comprising 31-35b Fen Pond Road as cars visiting those properties regularly use the Close. The Close parking is already at full capacity aside from small periods in the day meaning any church events have to park along the road and grass already causing significant congestion at key times. This is a significant negative impact for the residents, including in respect of air quality (SAO 12) which the SA assessment currently omits.</p> <p>In light of this, it is hard to see how a new development of this scale in the proposed location, could have anything other than a materially negative on the village's character and quality, cultural heritage resource and pollution levels with cars queueing on Fen Pond Road to get past the parked cars lining the road (SAO 6, 7, 11, 12). Notably the SA currently appears to underestimate the wide-ranging negative impacts.</p> <p>Access to education</p> <p>Ightham has a primary school already at full capacity each entry year and lacks the buildings and facilities to increase its intake any further. A build of the scale proposed in 59871 is likely to have a materially detrimental impact on access to the village school for those across the village. The SA fails to reflect this and the suggestion in the SA that the development could stimulate new schools or spaces being created is unrealistic and should not be a materially relevant consideration for the assessment under SAO 3."</p>	<p>With regard to SA objective 9: soils, the site is already recorded as having a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).</p> <p>The SA acknowledges that in relation to SA objective 10: climate change mitigation, the site is more than 800m from a railway station but within 400m of a bus stop. SA objective 10 (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>The site receives a negligible effect in relation to SA objective 12: air quality, as it is not within 100m of an AQMA. This is in line with the site assessment criteria.</p> <p>The SA utilises a precautionary approach and therefore does not underestimate the adverse effects development could have.</p>
42819681	Q8 of the questionnaire	<p>"In North East Tonbridge:</p> <p>1) Sites 59690, 59693, 59721, 59805 and 59809 fulfil all the five objectives of Metropolitan Green Belt.</p> <p>2) Sites 59690, 59693, 59721, 59805 and 59809 consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A), the importance of which has been highlighted by recent food shortages.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Sites 59693, 59721 and 59809 are recorded as having minor positive effects in relation to SA objective 1: health and wellbeing, as they are</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>3) Development on sites 59690 , 59693, 59721, 59805 and 59809 will exacerbate existing peak period traffic congestion on the A26 leading into Tonbridge and other local roads. The situation will be further worsened as a result of the proposed development in Tudeley and Paddock Wood which is part of the Tunbridge Wells B.C. local plan. This will lead to cut-through traffic on local roads, including Hadlow Rd, Cranford Rd, Three Elm Lane, Barchester Way and Higham Lane.</p> <p>4) I fail to understand how Sites 59693, 59721 and 59809 have been rated as + for SA1 as there are no dedicated cycle paths in this part of Tonbridge and the existing healthcare facilities will be overloaded by the additional population that will live in the large number of new houses that would be built on these sites. It is true that these three developments will join the open countryside on their eastern flank, until that is the town is extended further eastwards towards Hadlow in the next (post 2040) phase of urban sprawl! Also why are Sites 59690 and 59805 rated as only -?/+ for SA1 when they have the same postcode as Site 59809?</p> <p>5) Development on sites 59690, 59693, 59721, 59805 and 59809 will lead to a significant loss of productive agricultural land or land with that potential future use.</p> <p>6) Development on sites 59690, 59693, 59721, 59805 and 59809 will irrevocably alter the open, semi-rural, low-density character of the communities on the current edge of Tonbridge town (so lowering their SA1 score!)</p> <p>7) There will be a significant negative impact on the functioning of Tonbridge town centre due to the expansion of the town boundaries and consequent population increase.</p> <p>8) None of the sites identified on the Green Belt around Tonbridge are easily accessible to local facilities – shops, schools, medical facilities etc. Again, why have Sites 59693, 59721 and 59809 been rated as + for SA1?"</p>	<p>either within 800m of an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both).</p> <p>Sites 59690 and 59805 are incorrectly recorded as containing open space. The reasons these sites are recorded as containing open spaces is that they slightly overlap existing open spaces and so the GIS analysis identified them as containing open spaces. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the sites will receive minor positive effects in relation to SA objective 1.</p> <p>The SA gives consideration to the Agricultural Land Classification under SA objective 9: soils. The sites listed, with the exception of 59690 and 59809, are recorded as having significant negative effects in relation to this objective as they are greenfield and contain a significant proportion of Grade 1 and/or 2 agricultural land (best and most versatile agricultural land). Sites 59690 and 59809 receive uncertain significant negative effects in relation to this objective, as they contain a significant proportion of Grade 3 agricultural land but it is unknown whether the Grade 3 agricultural land is Grade 3a (high quality) or 3b (not classed as high quality). The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>
42483521	Q8 of the questionnaire	<p>"Site 59592</p> <p>1127oesn't1127 the exisitng healthcare facilities are full. The existing open space has a small play area and very little for teenagers</p> <p>2. Obj 3 close to primary School which is oversubscribed but local secondary schools are in Tonbridge or Tunbridge Wells require a long bus ride on a busy road.</p> <p>3. Obj 5 on the pl1127oesn't1127ynd i reguarly see bats, deer, foxes and I understand there may be badgers and snakes. This is not suitable land for the wildlife.</p> <p>4. Obj 6 I cant see how a development on this greenbelt land with no doubt felling of trees and a new access road will enhance the borou-h.</p> <p>5. Obj 8 - 1127oesn'tte map doesnt show it but there is also a pond on the site support the wildlife. The area already has a lot of rainwater</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Both sites fall within 800m of a number of open spaces, not just one.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, both sites are recorded as having an uncertain significant negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>coming from the fields at the back and I believe further building may cause issues.</p> <p>Site 59808</p> <p>1. obj 1 per site 5952 above</p> <p>2. Obj 3 per site 5952 above</p> <p>3. obj 5 we need to be protecting this land, its wildlife. It is regularly used by myself and others for exercise and family walks.</p> <p>4. Obj 6 part of the land has already been approved for development further development before that site has fully bedded in and the impact of local services, the community, wildlife and flooding need to be seen before further such developments."</p>	<p>With regard to SA objective 6: landscape and townscape, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. Some errors have, however, been identified regarding whether sites are within, on the edge of or not located near any settlements in a rural location. This is because the GIS analysis identified some sites as not located near any settlements when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. Therefore, in the next iteration of the SA Report, some of the effects against this objective will be updated to accurately reflect whether sites are on the edge of not located near any settlements.</p> <p>With regard to SA objective 8: water, site 59592 is recorded as not containing a water body or watercourse. There is a water body around 100m to the north east of the site.</p>
42715681	Q8 of the questionnaire	<p>"Sites 59647, 59635, 59601, 59859, 59776, 59637, 59638, 59686, 59842, 59806, 59853, 59857 and 59811. SA objective 1 - should be a significant negative for all. The Hadlow GP surgery is fully subscribed. SA objective 3 - should be a significant negative. The primary school has very little room for expansion, thus parents of primary school aged children will drive them to schools elsewhere (very few entrust children of that age to buses) leading to traffic congestion in the village with a detrimental impact on health and wellbeing.</p> <p>Sites 59635 and 59647. SA objective 6 - should be a significant negative. 59647 is Green Belt land. Also, 61 and 134 additional homes respectively would put unsustainable pressure on Court Lane which is unsuitable for an increase in traffic volume, as is its junction with the A26 which already gets congested.</p> <p>Sites 59601 and 59859. SA objectives 5 and 8 - should be a significant negative. These sites are both bounded by the River Bourne and run off from any development could adversely impact on biodiversity and water quality.</p> <p>Site 59601. SA objective 6 - should be a significant negative. This is Green Belt land. Any development would harm the aspect of the village and Hadlow Tower on the approach from the south.</p> <p>Site 59859 and 59776. SA objective 6 - should be a significant negative. Residents' and/or businesses' vehicles would be using Carpenters Lane which is unsuitable for increased traffic volume. In addition it would add to congestion at the junction with the A26. In addition, Site 59776 is in Green Belt land enjoyed by local walkers using the public footpath that crosses it.</p> <p>Site 59637. SA objectives 1 and 6 - should be significant negatives. This is Green Belt land enjoyed by local walkers using the public footpath that crosses it. Moreover, Cemetary Lane is unsuitable for the additional volume of traffic that development of the site would produce and it has no footpath.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown. This objective does not look at traffic congestion on local roads.</p> <p>With regard to SA objective 6: landscape and townscape, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. Some errors have, however, been identified regarding whether sites are within, on the edge of or not located near any settlements in a rural location. This is because the GIS analysis identified some sites as not located near any settlements when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. Therefore, in the next iteration of the SA Report, some of the effects against this objective will be updated to accurately reflect whether sites are on the edge of</p>

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		<p>Site 59638. SA objectives 5 and 8 should be significant negatives. The site is next to a pond and development could impact on water quality and biodiversity. SA objective 6 - should be a significant negative. This is Green Belt land. Development would ruin the setting of the pond with a rural scene behind it.</p> <p>Site 59686. SA objectives 5 and 6. This is Green Belt land.</p> <p>Site 59842. SA objective 1 - should be a significant negative. Apart from the points about GP surgery and primary school noted above, a development of this size in this location would be out of all proportion to its neighbourhood and have a detrimental impact on the mental health and wellbeing of existing residents. There are two public footpaths adjacent to the site which are heavily used by local walkers whose enjoyment would be negatively impacted by a development here. The volume of traffic from such a development would worsen congestion in the village. SA objective 8 - should be a significant negative. It is understood that this land absorbs run off from fields to the north during heavy rain, helping to prevent flooding of houses to the south of it and the village as a whole. Development of the site could significantly increase the risk of such flooding.</p> <p>Sites 59806. SA objective 1 - should be a significant negative. Apart from the points about the GP surgery and primary school in Hadlow, the additional traffic from such a huge development would cause significant additional congestion through Hadlow with a negative impact on residents' wellbeing. SA objective 6 - should be a significant negative. This is a large area of Green Belt land (including agricultural land) with some woodland.</p> <p>Site 59811. SA objective 1. As above for 59806 with the further issue of a likely heavy use of Carpenters Lane which is unsuited to a high volume of traffic. SA objectives 6 - should be significant negatives. This is Green Belt land and is part of the landscape around Oxenhoath. Development would significantly encroach on the Green Belt land (including agricultural land) where there are public footpaths and ruin the setting of the listed Oxenhoath."</p>	<p>not located near any settlements in a rural location. This objective also does not look at traffic congestion on local roads.</p> <p>Site 59638 is already recorded as containing a water body, under SA objective 8: water. It receives uncertain significant negative effects against both SA objectives 5: biodiversity and geodiversity and 8. All negative effects against these two objectives receive uncertainty, as the actual effects will depend on the final design, scale and layout of development.</p> <p>Site 59842 already receives a significant negative effect in relation to SA objective 8: water. The effect is recorded as uncertain, as the site is located within a Source Protection Zone. Therefore, the extent to which water quality is affected depends on construction techniques and the use of sustainable drainage systems within the design.</p>
42713345	Q8 of the questionnaire	<p>"Site 59761</p> <p>SA Objective 1 is a certain significant negative as it removes the open space used as a sports facility.</p> <p>SA Objective 5 is a certain significant negative as it would destroy a woodland therefore there is not way that biodiversity and geodiversity could be maintained</p> <p>SA Objective 6 is a certain significant negative as it would remove an open space"</p>	<p>The significant negative effect against SA objective 1: health and wellbeing is recorded as uncertain, as the open space may be lost as a result of development. However, it is also possible that the open space may be incorporated into the development as it only overlaps the site in its south east corner.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain. As outlined in the site assessment criteria contained within Appendix D of the Interim SA Report, "Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application".</p> <p>All negative effects against SA objective 6: landscape and townscape are recorded as uncertain, as if a site contains an open space it is unknown whether that open space will be retained or not, and the actual effects will also depend on the final design, scale and layout of development, which will be determined at planning application stage.</p>
42742625	Q8 of the questionnaire	<p>"Site 59830:</p> <p>SA Objective 1 - I disagree that it will have a positive impact on human health. The vast majority of this site is undeveloped land that is used and cherished by the local community. This will negatively impact human physical and mental health.</p> <p>SA Objective 6 - The report incorrectly states the site is not near any rural settlements. It IS near some - Ightham, Wrotham Heath, Platt Village to name some, as well as Borough Green itself. The effect of development would be to combine these individual villages into a large urban settlement. The report suggests the site is within 500m of the AONB; this is incorrect as large parts of the site are WITHIN the AONB.</p> <p>SA Objective 10 - Whilst some of the site may be within 800m of a train station, the site is large and some areas are actually 2.2km away (measured in a straight line).</p> <p>SA Objective 12 - I believe the site IS within close proximity of an AQMA on the A25.</p> <p>Site 59632:</p> <p>No objection."</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59830 is recorded as having a significant positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of a GP surgery and open space, in addition to walking paths.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect because it is within 500m of the AONBs. This wording is used for sites that are within the AONBs, as well as within 500m of them.</p> <p>As only a small percentage of site 59830 overlaps the settlement of Borough Green, the GIS analysis does not identify it as adjoining the settlement of Borough Green. In the next iteration of the SA, we will refine the GIS analysis so that sites where there is very little overlap with existing settlements are still recorded as bordering those settlement. However the effect will remain the same, as the site is within 500m of an AONB.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater."</p> <p>With regard to SA objective 12: air quality, the site is not located within 100m of an AQMA.</p>
42530881	Q8 of the questionnaire	<p>"Site 59669</p> <p>SA Objective 1: development would significantly impact human health and well-being. It is currently used for dog walking and this would be lost. Up until 3years ago this was grazing land for sheep cows horses</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>pigs and goats. As a country we need to produce more food so to lose 40acres of land to housing would impact on that</p> <p>SA Objective 2 : I agree as only access is onto Noble Tree Road which is a narrow lane</p> <p>SA Objective3: Disagree Schools referred to are fee paying and should not be included in the assessment. Fosse Bank School is in a difficult financial position and may close</p> <p>SA Objective 4: Agree</p> <p>SA Objective 5: Definite negative effect as site is existing green infrastructure which is home to roe deer, muntjac deer buzzards, red kites, toads and grass snakes. There is no way wild life could be protected in a housing development</p> <p>SA Objective 6: Definite significant negative. Noble Tree Road is a country lane and to have a housing estate would certainly not enhance the character of Hildenborough. The road is already heavily used and could not cope with significantly increased traffic</p> <p>SA Objective 7: Agree</p> <p>SA Objective 8: Significant negative but assessment inaccurate as there is a small pond adjacent to Noble Tree Road. There is significant surface water flooding and run off into a stream that then runs into the Hawden Stream with the definite possibility of increasing flooding.</p> <p>SA Objective 9: significant negative- this land was originally Rings Hill Wood flattened in the hurricane of 1987. Since then it has been used as grazing land for pigs goats sheep cows and horses. It is now used for dog walking. A development would not conserve nor enhance soil resources and guard against land contamination. There is also no Mains drainage for houses on the west side of Noble Tree Road and down a section of Rings Hill so this would cause huge destruction of greenfield site</p> <p>SA Objective 10: Disagree as car traffic would be greatly increased in country lane with estimated 800 extra car journeys per day</p> <p>SA Objective 11: Disagree as arborists on site of assessing which trees should be removed. Trees help stop climate change so we should be planting them in green field sites not cutting them down</p> <p>SA Objective 12: no comment</p> <p>SA Objective 13: Agree</p> <p>SA Objective 14: uncertain minor positive as there are no details of what Bovis is planning on the 4 fields"</p>	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, all schools included in the GIS analysis are state schools.</p> <p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain. As outlined in the site assessment criteria contained within Appendix D of the Interim SA Report, "Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application".</p> <p>All negative effects against SA objective 6: landscape and townscape are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development, which will be determined at planning application stage.</p> <p>With regard to SA objective 8: water, the pond the respondent is referring to is located outside of the site, not within it. The site already receives a significant negative effect in relation to this objective, as it is within an area with a 1 in 30 year risk of surface water flooding.</p> <p>The significant negative effect against SA objective 9: soils is recorded as uncertain, to acknowledge the fact it is unknown whether the Grade 3 agricultural land is Grade 3a (high quality) or 3b (not classes as high quality).</p> <p>SA objective 10: climate change mitigation looks at the proximity of development sites to sustainable transport links, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities. The SA does not specifically look at traffic levels but to inform plan-making, the Council will commission additional evidence on traffic.</p> <p>Site 59669 receives a significant positive effect in relation to SA objective 14: housing, as it is expected to comprise 100 dwellings or more. We have responded to this estimated yield provided by TMBC, which was generated using a methodology agreed by the Council and applied to all sites.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			With regard to the respondent's comments on the remaining SA objectives, these have all been appraised in accordance with the site assessment criteria.
42107681	Q8 of the questionnaire	<p>"59550</p> <p>SA Objective 1. This conflicts with the Objective as it would remove an outdoor children's recreation facility which is currently well used. The next nearest children's facility is at Haysden Country park which can not be safely accessed by unaccompanied children.</p> <p>SA Objective 5. This would remove a green area and impact adversely therefore unless really good enhancement of biodiversity were made.</p> <p>SA Objective 14. The site is not large enough to make any significant contribution, for example a low rise block of affordable housing, as it is not large enough.</p> <p>59552.</p> <p>SA Objective 1. This conflicts with the Objective as it would remove an outdoor children's recreation facility which is currently well used. The next nearest children's facility is at Haysden Country park which can not be safely accessed by unaccompanied children.</p> <p>SA Objective 5. This would remove a green area and impact adversely therefore unless really good enhancement of biodiversity were made.</p> <p>Overall there will be a significant negative impact on the functioning of the town centre both income and amenity due to the expansion of the town boundaries and consequent population increase. It will be easier to access Sevenoaks for example due to congestion.</p> <p>None of the sites identified on the Green Belt around Tonbridge are easily accessible to local facilities – shops, schools, medical facilities etc.</p> <p>Air Quality. In Southwest Tonbridge sites 59550, 59552, 59571, 59572, 59641, 59695, 59764, 59765 and 59869 will all contribute to an unacceptable increase in traffic along Brook Street and will further overwhelm all the roundabouts along the A26 from Brook Street, St Stephens', Vale Road and will worsen the air quality in the Air Quality Management Area in Tonbridge High Street.</p> <p>Site 59683 will lead to signifcant loss of amenity and recreational space at Tonbridge Farm Sportsground where we have been told there is insufficient spare capacity for a Baseball Diamond but that we can now squeeze in hundreds of houses on a Floodplain! The selection of sites 59515, 59516, 59521, 59522, 59550, 59552, 59554, 59555, 59571, 599572 will all result in an unacceptable loss of amenity space for our communities."</p>	<p>Sites 59550 and 59552 are both recorded as having uncertain significant negative effects in relation to SA objective 1: health and wellbeing, due to the fact they contain an open space that could be lost as a result of development, although this is uncertain. The effects are coupled with a minor positive effects, as both sites are within 800m of other areas of open space, as well as walking paths.</p> <p>Site 59550 is already recorded as having a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, whilst site 59552 is recorded as having a minor negative effect. All negative effects against this objective are uncertain.</p> <p>With regard to SA objective 14: housing, the SA acknowledges that the site 59552 would provide fewer than 100 dwellings.</p> <p>The SA acknowledges that sites 59515, 59516, 59521, 59522, 59550, 59552, 59554, 59555, 59571 and 59572 contain open space. Site 59683 already receives an uncertain significant negative effect in relation to SA objective 8: water, as it falls within Flood Zone 3 and an area with a 1 in 30 year risk of surface water flooding. It also contains a watercourse.</p>
42801793	Q8 of the questionnaire	<p>"59597 disagree with assessment for obj 1, 3, 5,6,7,9,10,13and 14</p> <p>They are all Significant negative</p>	All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>All the sites around Oxenhoath this is West Peckham not Hadlow</p> <p>59806</p> <p>59811</p> <p>How on earth can building in an area of natural beauty, risk to flooding , narrow lanes be acceptable"</p>	<p>justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>
42719745	Q8 of the questionnaire	<p>"These comments cover Site IDs 59735, 59798, 59801, 59835 and 59804</p> <p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover a unique area of greenbelt land which sits between Tonbridge, Hildenborough and Shipbourne and has many bridleways and footpaths and so is accessed and enjoyed by horse-riders, cyclists and walkers. Development on these sights would have a devastating impact on the openness and permanence of the greenbelt land between Coldharbour Land and Horns Lodge Lane.</p> <p>2. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes. Sites 59801 and 59798 correctly have SA2 assessed as '-' and as such are flagged as least suitable for development. Sights IDs 59735, 59835 and relevant parts of 59804 should be equally scored '-' for SA2 and as such should also be ranked amongst the least suitable.</p> <p>3. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), climate change (SA11) and local air quality (SA12).</p> <p>4. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community.</p> <p>Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>5. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>6. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>7. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p> <p>8. Previous application to move a Dutch barn for stables on to sight IDs 59798, 59835 and equivalent section of 59804 was rejected due to impacting the openness of the greenbelt."</p>	
42713473	Q8 of the questionnaire	<p>"Site 59761</p> <p>Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Sub-Objectives</p> <ul style="list-style-type: none"> • To protect and enhance designated sites of nature conservation importance. • To protect and enhance wildlife especially rare and endangered species. • To protect and enhance habitats and wildlife corridors. • To provide opportunities for people to access wildlife and open green spaces. • To increase biodiversity net gain. • To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline. • To protect, enhance and expand ecological networks and their interconnectivity. • Conservation of biodiversity, including priority habitats and species, under the NERC Act (S41). • To protect and enhance sites designated for geodiversity. <p>. By taking away the woodland you will take away and significantly negatively impact all of the above. There are endangered species in the woodland and every one of these sub objectives will be negatively impacted. You will destroy habitats and wildlife corridors and further endanger species."</p>	<p>Site 59761 is recorded as having an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity, for the reasons outlined in the proforma.</p>
42539777	Q8 of the questionnaire	<p>"Site 59618</p> <p>The Sustainability Appraisal Objectives are too rigid and do not take into account site specific circumstances. The rigidity of the objectives could result in suitable sites being dismissed such as this particular site which is edge of settlement and which would satisfy Strategy Option 4. We can provide the following comments against the Council's assessment of the site as measured against the SA objectives.</p>	<p>The SA findings are one of many factors taken into account when determining a preferred option to take forward in a plan..</p> <p>Mitigation, as referred to in relation to SA objectives 5 and 6, is not taken into consideration in the 'policy-off' appraisals of the reasonable alternative development site options contained within Chapter 5 and Annex 1 of the Interim SA Report. If the sites are allocated at a later stage in the plan-making process and policy wording provided, mitigation will be taken into account through 'policy-on' appraisals of the sites.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 2 - development proposals can result in better connectivity once built out as planning policy requires residential schemes to improve the sustainability credentials of a site. It is therefore probable that this site will have improved accessibility with the benefit of planning permission compared to its current status.</p> <p>SA Objective 3 - it is unhelpful when a site is marked negatively based on uncertain factors. When factors are unknown or uncertain sites should be marked as neutral or negligible until those factors become known.</p> <p>SA Objective 4 - we disagree with the Council as a Minor Positive should be given here as residential development irrespective of location can contribute towards economic growth and delivery of employment opportunities.</p> <p>SA Objective 5 - again this is an unfair and incorrect judgement given that the Council itself states that it may be possible to conserve or even enhance the asset through the design and layout of the new development. We would reiterate this point and also add that Biodiversity Net Gain will be a compulsory requirement by which time the Local Plan will be adopted. This should be scored negligible as a minimum or even a Minor Positive.</p> <p>SA Objective 6 - The site is within the AONB but this does not preclude development per se. As the Council states, the effects of development are uncertain at this stage as the effects on the landscape will depend on the design, scale, and layout of development which may help mitigate any adverse effects. Any planning application that may come forward on the land would be accompanied by a Landscape and Visual Impact Assessment. This should be marked negligible at this stage.</p> <p>SA Objective 7 - the Council has incorrectly scored this as no heritage asset is within 250m of the site. This should be scored negligible.</p> <p>SA Objective 8 - again the Council have reached an incorrect conclusion as we can confirm that the site is within Flood Zone 1 which has no risk of flooding. This should be scored negligible.</p> <p>We have also submitted sites 59619, 59620, 59621 and 59622 on behalf of the same client. All these sites form part of the same landholding but were put forward as a whole and in parts thereof. This landholding is not within the AONB but is Green Belt. It is also edge of settlement and a short distance away from the High Street of West Malling. The site is highly sustainable. The majority of the comments we raise above for site 59618 apply here and we do not wish to repeat them again."</p>	<p>Some of the effects in the SA are recorded as uncertain, as the actual effects will depend on such things as mitigation which as outlined above, will be determined at a later stage in the plan-making process.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.</p> <p>With regard to SA objective 7: heritage, the site falls within 250m of a number of monuments as recorded in Kent County Council's Historic Environment Record. Therefore, the site receives a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain minor negative effect, as it contains land with a 1 in 100 year risk of surface water flooding.</p>
42796225	Q8 of the questionnaire	<p>"59745 Site north of Hilden Avenue – 72 Units</p> <p>59804 - Merging Hildenborough and Tonbridge</p> <p>59821 – Site North of Oast Road – Mixed Used</p> <p>59823 – Site North of Oast Road – Mixed Used</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>59808 - Site North of Woodfield Avenue 222 Units</p> <p>59609 - Little Trench farm -</p> <p>59612 - Trench farm</p> <p>59625 - Trench Farm</p> <p>59746 - Trench farm</p> <p>59683 - Longmead Flood plain</p> <p>and any other sites in this area - the mapping is very confusing with no overview...</p> <p>Objective 1: To improve human health and well-being</p> <p>This should be a major negative as the above sites means that a number of areas move further away from greenbelt as the green belt is built on.</p> <p>Objective 4: To encourage sustainable growth should be more negative. The houses are not near the town or the station. It would be much more sustainable to build houses closer to reliable transport links and or using sites in the town.</p> <p>Objective 5: To Protect Biodiversity and GeoDiversity This should be a Major Negative for these sites especially 59745, 59804, and 59808 but this area makes up parts of other sites too.</p> <p>In this locations they are partially wooded, there are ponds, low brush, they are not open fields etc. There is all sorts of wildlife that inhabit these sites. Badgers, Foxes, various small rodents, owls (at least two types), bats, all sorts of insects (multiple butterfly species, dragon flies) Toads, frogs, hedgehogs. We also regularly see woodpeckers, moorhens, kingfisher, heron, various breeds of duck, newts, Jays etc etc. There are very few ares like this in the green belt, especially on the doorstep of town so people can go out and appreciate the biodiversity and wildlife.</p> <p>Objective 6: To protect and enhance the borough's landscape. This should be a major negative as the top five sites will connect Hildenborough and Tonbridge. At the moment from Tonbridge you cannot see the north side of Hildenborough as it is hidden by the brow of the hilden ridge. The top three developments on the list above essentially would mean that the green view from tonbridge will be destroyed and it will remove the gap between the town and the village. Building on fields that until the 1970's were used for hop production.</p> <p>Objective 7: To protect the cultural heritage resource</p> <p>Should be significant negative especially for top four. In this area there are a number of historic farmsteads that have been on maps for hundreds of years. There is the site of an old chandelery, oast houses, farm houses that describe the rural and industrial nature of the Hilden/Tonbridge area. They are able to be walked past on many different walks through the area and surrounding them with new</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. If a site contains an existing business that could be lost as a result of residential development, it receives a minor negative effect. All mixed use and employment site options are expected to have positive effects on this objective, as they provide opportunities for new jobs.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, all negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, all negative effects are recorded as uncertain, as the actual effects will depend on the design, scale and layout of development, which will be determined at planning application stage. Some errors have, however, been identified regarding whether sites are within, on the edge of or not located near any settlements in a rural location. This is because the GIS analysis identified some sites as not located near any settlements when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries. Therefore, in the next iteration of the SA Report, some of the effects against this objective will be updated to accurately reflect whether sites are on the edge of or not located near any settlements.</p> <p>With regard to SA objective 7: heritage, all effects are recorded as uncertain, as the actual effects will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, sites are given a significant negative effect if they are entirely or significantly within Flood Zone 2 and/or within an area with a 1 in 30 year risk of surface water flooding. Sites are given a minor negative effect if they are entirely or significantly within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soils, sites are given a significant negative effect if they contain a significant proportion of Grade 1 and/or 2 agricultural land. Sites are given an uncertain significant negative effect if they contain a significant proportion of Grade 3</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>builds will destroy the cultural heritage and the pleasant walks through it for residents.</p> <p>Objective 8: To protect and enhance water features and resources</p> <p>The sites above are on hills that form the catchment area for hildenbrook and the Medway. Both of which flood. At the moment, the run off from these hills is slowed by the presence of vegetation and soil. There is already flood waters that form at the bottom of Hilden Avenue, Hildenborough in heavy rain. The clay soils currently holds significant water but if these are covered in concrete that capacity will be gone and flood risks will increase.</p> <p>All of the above meet the 5 objectives of Metropolitan Green Belt</p> <p>Many of the Sites consist of productive, Best Most Valuable agricultural land (Grades 1,2,3A), the importance of which has been highlighted by recent food shortages. But also land full of nature with multiple species fundamentally reducing biodiversity</p> <p>Many of above have been previously affected and are all at increasing risk of flooding both from fluvial and surface water sources and many are identified as being at huge increased risk as recognised by the strategic flood risk assessment.</p> <p>All will lead to a significant loss of productive agricultural land or land with that potential future use.</p> <p>Longmead plot significantly reduces amenity and facilities for public</p> <p>59745 - significantly increases the traffic on an already congested road with limit access for traffic with only link onto exiting road system is on a blind corner (Hillview Road/Hilden Avenue)"</p>	<p>agricultural land, with the uncertainty acknowledging that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Sites are given a minor negative effect if they contain less than a significant proportion of Grade 1, 2 or 3 agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>
42720097	Q8 of the questionnaire	<p>"Sites 59424, 59544, 59547</p> <p>Objective 1The development would remove trees and worsen air quality and quality of life for existing nearby residents.</p> <p>Objective 10 and 12 The loss of trees and vegetation combined with the increase in traffic would not be a positive. The site is not accessible for all (ref NPPF) as the rail station is too far for many to walk and the bus service does not run 24/7 on a frequent basis.</p> <p>Sites 59531, 59534, 59884</p> <p>Objectives 1, 2, the site is used as a community play area by children.</p> <p>10 and 12 the removal of the green space and new traffic movements associated with the development will increase greenhouse gases. Car ownership at Kings Hill is high due to the lack of local services and facilities (it's not a town) the distance to the train station and the lack of adequate bus services.</p> <p>Annoyingly the list of sites in Annex 1 are not in any order and who has the time to sift through all the sites? I have commented on those that I have found but have been told there are other sites which affect where I live which were at the back of the Annex. Please provide a list of all sites proposed at and around Kings Hill so that me and others affected can easily access the information and take part in this</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to trees, this is considered under SA objective 5: biodiversity and geodiversity, not SA objective 1: health and wellbeing. Air quality is considered separately under SA objective 12: air quality.</p> <p>Each of these three sites is more than 800m from a railway station but within 400m of a bus stop. As such, they each receive a minor positive effect in relation to SA objective 10: climate change mitigation.</p> <p>The SA acknowledges that sites 59531, 59534 and 59884 contain open space.</p> <p>The unique ID numbers are how the sites are referred to throughout the Local Plan and so names for each site have not been provided. In the next iteration of the SA Report, the proformas will be structured by ward and a Contents page provided.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		consultation. This would be a fair and reasonable way to consult local people so that they can make their views known and help to shape the new Local Plan. Currently the documents are difficult to access, difficult to read and take hours to filter through."	
42616033	Q8 of the questionnaire	<p>"Loss of Kings Hill Golf Course including loss of local employment, bar, club staff and green keepers - Contrary to SA Objective 4 and 1</p> <p>Loss of enjoyment to golf members, including seniors, juniors and local associations using the club facilities contrary to SA Objective 5 and 1</p> <p>The site contains a body of water contrary to SA Objective 8</p> <p>The site is principally a golf course not agricultural land contrary to SA Objective</p> <p>The site expected to provide 1228 dwellings contrary to SA Objective 14 namely 100 dwellings. If a smaller site is being proposed, it should be shared with the community"</p>	<p>Sites 59797 and 59800 receive uncertain significant negative effects in relation to SA objective 1: health and wellbeing, as they contain Kings Hill Golf Course. SA objective 4: economic growth relates to the delivery of employment opportunities. Both sites are expected to have a negligible effect in relation to SA objective 4 as "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>The sites receive uncertain significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within 250m of Kings Hill Golf Course, Cattering & Hoath Wood Local Wildlife Site and area of Ancient Woodland. They also contain green infrastructure assets.</p> <p>Site 59800 is acknowledged in the SA as containing a water body and therefore received an uncertain significant negative effect in relation to SA objective 8: water.</p> <p>SA objective 9: soil relates to the Agricultural Land Classification (ALC). The ALC still applies when land is not actively being used for agricultural purposes.</p> <p>The sites receive significant positive effects in relation to SA objective 14: housing, as they are expected to comprise 100 dwellings or more. This is in line with the site assessment criteria.</p>
42442881	Q8 of the questionnaire	<p>"Some of the site assessments consider impacts to be negligible or not have a negative impact which I disagree with for example site 59424 would involve felling trees, destruction of bio diversity and wild life habitats. How does this comply with COP 26 pledges? Also this site suggests potential for 100+ dwellings , how would the local health infrastructure be supported to manage this increase with a GP group that is already struggling to serve the existing population."</p>	<p>Site 59424 is recorded as having an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p>
42801121	Q8 of the questionnaire	<p>"1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it.</p> <p>This fact alone must significantly reduce the suitability of the areas for development."</p>	<p>It is noted that Horns Lodge Lane is used for recreational purposes.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>
42721345	Q8 of the questionnaire	<p>"1. Site 59821, 59823, 59683 apply</p> <p>i) These fulfills all the 5 objectives of Metropolitan Green Belt.</p> <p>The above sites to the North of Oast Lane directly on the boundary between Tonbridge and Hildenborough serves as a green wedge effectively protecting Hildenborough's status as a village and stopping it becoming absorbed into the urban sprawl of Tonbridge. It is not infill within the village and will effectively remove any demarcation between the town and the village. Hildenborough will become part of the town forever and will completely lose its identity.</p> <p>ii) Development on these sites will lead to a significant loss of productive agricultural land which has been farmed for decades</p> <p>iii) (SA Objective 5 , 6 and & 7) Environment- These sites are the start of a vast stretch of open countryside stretching all the way to Shipbourne and beyond. It provides protection against flooding, opens out onto a historic orchard used in the hop industry. As such it attracts birds of prey including buzzards, barn and screech owls, swifts, swallows and roe deer. There are two very old ponds and</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is important to note that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers when selecting preferred options for a plan.</p> <p>As acknowledged in the proformas for these sites against SA objective 9: soils, each comprises greenfield land and contains a significant proportion of Grade 3 agricultural land. Therefore, each site receives a significant negative effect against this objective. The effect is recorded as uncertain to acknowledge the fact that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>multiple mature trees over a hundred years old which would be destroyed forever if these sites are developed.</p> <p>This site IS located near a rural settlement namely the 8 houses off Oast Lane four of which (1 oast houses, 1 cottage, 1 hop barn and 1 bull barn) are of significant cultural heritage being used in Kent's historic hop and farming industry. If the fields surrounding these properties were to be developed the essence of the rural nature of these historic hop properties would be lost forever.</p> <p>iii) Infrastructure: The bus service through Hildenborough out of rush hour is only hourly and access to train stations is not within an acceptable walking distance for many people being more than 30 mins to Tonbridge train stations and an hour to Hildenborough from the South side.</p> <p>iv) SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change: Development of these sites, being over 2 miles from the North access to the A21 (Morley's Roundabout), would result in a significant amount of south bound traffic joining the already congested B245 route towards Tonbridge High Street to join the A21 (Vauxhall Lane junction).</p> <p>During rush hour the queues from the intersection with the Shipbourne Road and the High Street already tail back to Dry Hill Park Road and this will only cause further congestion backing up through Hildenborough village and Shipbourne Road causing more pollution and for the local residents and school children. Over 450 children live during term time in the boarding houses on these main roads and they will be directly affected by the pollution caused by any increase in traffic in the North Tonbridge/ South Hildenborough area. The adverse health effects of such pollution on children and the links to asthma are well documented. As well as Tonbridge boarding school there are 2 primary schools on Dry Hill Park Road which will also be affected by pollution should traffic increase.</p> <p>The traffic along the B245 is solid at rush hour and without lights or a roundabout the ability of traffic leaving Oast Lane to drive North Bound will be severely restricted causing traffic to back up a short access road.</p> <p>vi) SA Objective 2: To improve equality and access to community facilities and services: Local services already under considerable strain - in particular Hildenborough's GP surgery and schools & school buses. Already a considerable number of houses being built on Fidelity site plus the new care home will begin to affect those services too.</p> <p>Vii) The B245 regularly floods in particular by Waterfield Lane and Farm Lane. Any destruction of greenfield sites on the North (higher) side of this Road will cause more rain water to run into the B245 and causing flooding to the properties on the South of this road. Properties around Correnden Road and Hawden Lane/Road have flooded in the past and will do some more regularly.</p>	<p>With regard to SA objective 5: biodiversity and geodiversity, all three sites receive an uncertain significant negative effect against this objective.</p> <p>With regard to SA objective 7: heritage, all three sites are recorded as having uncertain significant negative effects in relation to this objective.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 8: water, all three sites receive significant negative effects for the reasons provided in the proformas.</p> <p>With regard to SA objective 10: climate change mitigation, the criteria for this objective look at proximity to railway stations, bus stops and cycle paths, so as to encourage more active and sustainable transport modes. All three sites receive a minor positive effect in relation to this objective because although they are more than 800m from a railway station, they are within 400m of at least one bus stop.</p> <p>The site assessment criteria for SA objective 2: services and facilities relate more specifically to access to services and facilities, rather than capacity of existing services.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Viii) Development will irrevocably alter the open, semi-rural, low-density character of the communities on the current edge of Tonbridge town</p> <p>ix) None of the sites identified on the Green Belt around Tonbridge are easily accessible to local facilities – shops, schools, medical facilities with spare capacity"</p>	
42795649	Q8 of the questionnaire	<p>"59715: SA Objectives 5,6,7,9 will have a definite significant negative effect destroying agricultural land and impacting heritage assets. It is located on a narrow road close to the rural settlement of East Malling Village which will be negatively impacted. Most traffic from this site will come through East Malling Village having a negative effect on air quality and green house gases (objectives 10 & 12) and add to the congestion in Chapel Street & the High Street. This will have a serious negative effect on the heritage assets of the village</p> <p>59726 & 59631: Same comments as above</p> <p>59740, 59636, 59824, 59743, 59698 & 59630 are close to East Malling Village and will have a negative effect on air quality due to increase in traffic</p> <p>The cumulative effect of all these developments needs to be taken into account as East Malling village is being surrounded on all sides with significant negative effect on green areas, character, heritage assets and air quality. The current developments along New Road and Forty Acres should also be taken into account as East Malling Village will be directly impacted by the huge traffic increase. Traffic needs to be diverted away by other routes and rat running prevented through the village. Please do not look at these sites individually as there are a large number in close proximity to East Malling Village"</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). The sites listed are not within 100m of an AQMA.</p> <p>The next iteration of the SA will contain a cumulative effects section, which will explore the total effects of the plan as a whole, including where settlements may have more than one allocation and what cumulative effect this might have.</p>
42666881	Q8 of the questionnaire	<p>"SA objective 2</p> <p>59750: bus service recently reduced to twice per hour during daytime, I would question whether much of proposed site will be within a 'fair' walking distance of existing bus stops on The Street.</p> <p>59758: Beech Road is narrow single-track lane without footpaths, only the eastern end of the road (Airfield Estate) is served by a bus route (and that of indeterminate frequency).</p> <p>59752: again question whether access is 'fair' rather than 'poor' given distance some of site is from A26 and A228.</p> <p>SA objective 3</p> <p>59749: given distance between site and primary school, and the busy/dangerous roads between do not believe this should be 'positive' in any way.</p> <p>59753: likewise.</p> <p>SA objective 8</p> <p>59816: is the flood risk really 'negligible'?</p> <p>SA objective 10</p>	<p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Site 59752 was recorded in the Urban Capacity Study as falling within the Fair Accessibility Band and so received a minor negative effect in relation to SA objective 2.</p> <p>SA objective 3: education looks at access to educational facilities only, not road safety.</p> <p>It is correct that site 59816 is not considered at risk of flooding.</p> <p>Sites 59750, 59752, 59758, 59759, 59760 and 59761 are all recorded as falling within 400m of a bus stop.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		59750, 59752, 59758, 59759, 59760 and 59761: do not believe all of proposed sites will be within 400m of an existing bus stop."	
42443361	Q8 of the questionnaire	<p>"+ There are inaccuracies in the Sustainability Appraisal for various startegic & individual sites.</p> <p>+ For example, the train station indicated at Wateringbury is NOT in Tonbridge & Malling Borough but in Maidstone.</p> <p>+ Further, the Station is in Green Transport/walking/cycling distance of only a very few areas/sites. The Station has a very small Car Park (shared with the local School)</p> <p>+ In the case of some site assessments has been inaccurately considered - one INDICATIVE example is Appendix B Site 59803 stated as within 800m of the station when in fact only a very small remote corner of the site may be within a arc as the crow flies."</p>	<p>The railway station the respondent refers to is located within the boundaries of Tonbridge and Malling Borough. However, even if the railway station were located within Maidstone Borough, residents living within Tonbridge and Malling would still likely access it.</p> <p>With regard to the respondent's comment on site 59803, the SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater."</p>
42718849	Q8 of the questionnaire	<p>"Site ref 59791 and 59792</p> <p>Although the objectives may cover most eventualities nearly all assessments are wrong due to a lack of local knowledge by the compilers of this local plan.</p> <p>1) The medical centre quoted in objective 1 does not exist at this present time, and is unlikely to be built, if past experience is anything to go on. The local G.P. surgery are unable to cope with the present level of patients. The site is within an area of open space and these outdoor spaces are of much need to the local residents including the allotments. I would suggest your minor positive is in fact totally wrong as an objective because there would be no positives to improve health and well being in fact with a further influx of residents from any further housing once again the levels would become major negatives and not minor positives.</p> <p>2) With the great increase of traffic within the local area, which has had a huge impact on the infrastructure already, the exits from these sites do not have the best sight lines and in my opinion will in fact create a dangerous area.</p> <p>3) The school mentioned within the 800 mtrs boundary is already full to capacity, and local families coming to the area are having to seek places at other schools further away from the village. This means further movements of vehicles which will increase emissions and add to air pollution.</p> <p>5)The taking of agricultural land and allotments not only do they not enhance the well being of local residents, but in the bigger picture reduce food supplies.</p> <p>6)The AONB mentioned in this area is in point of fact only 100mtrs from this proposed site and will have an effect on wild life which is of various types including badgers.</p>	<p>The proformas for sites 59791 and 59792 state that they are either within 800m of an existing healthcare facility <i>or</i> an existing area of open space/walking and cycle path/play area/sports facility (but not both). Specifically, both sites are within 800m of an area of open space and some walking paths. The SA acknowledges that both sites contain an area of open space that could be lost as a result of development, although this is uncertain. The overall effect for both sites against this objective is mixed uncertain significant negative and minor positive.</p> <p>The SA is too high-level to give consideration to sight lines.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 7: historic environment, sites 59791 and 59792 are recorded as having uncertain significant negative effects for the reasons provided in the proformas. All effects against this objective are recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>Both sites are recorded as having significant negative effects in relation to SA objective 9: soils, as they contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>The SA uses 500m as a threshold for determining effects on the AONB. Due to the fact both sites are within 500m of an AONB, both receive an uncertain significant negative effect in relation to SA objective 6: landscape and townscape.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does</p>

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		<p>7)While it is uncertain what the impact 170 houses will have on the heritage site, the site will obviously have a horrendous effect on the well being of all residents.</p> <p>8)The rainfall on the Downs/ANOB which at present is absorbed by the agricultural fields would not have any natural soak away when these fields are replaced by footings and roadways.</p> <p>10) The bus stop is within 400 yards of these sites but at present there are no buses visiting Wouldham village, and this would mean residents of these properties would need to use their cars for all journeys therefore increasing the gas emissions .</p> <p>11) With the remarks already made re: emissions, it is obvious that these sites will only add to climate change, and will not minimise its impact on climate change.</p> <p>12) Air quality has always been a bone of contention in Wouldham and more vehicles will only add bad gases to this level.</p> <p>To summarise these answers to sites 59791 and 59792 it is very obvious that these sites are not suitable for housing due to the lack of infrastructure including no schools, no medical centre, no bus service, and a sharp rise in the bad air quality. Remembering that this area is still called ""The Garden of England"" and should be treated as such."</p>	<p>not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). The sites listed are not within 100m of an AQMA.</p>
42721793	Q8 of the questionnaire	<p>"For each of Site 59803, Site 59845, Site 59728 and Site 59700 the document states</p> <p>"SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA.""</p> <p>This is incorrect. The site is within 100m as per Drawing DD / 343/3 (Management area No 3 order 2005) This AQMA has the highest levels in the Borough.</p> <p>The development of these sites will significantly increase the already very high levels of congestion on this cross roads every morning and evening with mile+ long tail backs in each direction (check Google traffic historic maps for evidence of this) as well as adding to and expanding the area of air quality concern.</p> <p>It is also the case that there has very recently been the addition of 55 homes in the Meadow View Court development in the centre of the Orpines.</p> <p>Since that development there has been a significant increase in flooding along the main road blocking half or at times the whole road. Throughout this area there are a series of complex water courses and such a major development will lead to much higher levels of water coming down the slope of the valley to cause flooding at the junction."</p>	<p>Although sites 59803, 59845, 59728 and 59700 are within fairly close proximity of the AQMA mentioned, they are just over 100m from it. As such, they receive negligible effects in relation to SA objective 12: air quality.</p> <p>None of the sites have been identified as being at risk of flooding, including surface water flooding.</p>
42442017	Q8 of the questionnaire	<p>"59685; 59690; 59693; 59721; 59805; 59809</p> <p>The following are errors in the assessment:</p>	<p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In</p>

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		<p>1) SA objectives 4 and 10 rely on the presence of a bus stop within 400m. The bus service is poorly used by residents in that area - most use cars. Data on this will exist, but I cannot provide it in time for this consultation. Factoring in this local knowledge and data should turn these positive marks to negative marks. See e.g. consultation's paragraph 5.5.11 ""Bus patronage has not recovered to pre-pandemic levels and there is concern at this time regarding the ongoing viability of many bus services, which could be lost if patronage does not improve, or if government funding is reduced or withdrawn.""</p> <p>2) SA objective 8 ""The site does not contain a water body or watercourse"" - this is incorrect. The area is well known locally for having poor drainage and possible springs.</p> <p>3) SA objective 14. No justification at all is given for the positive mark.</p> <p>4) SA objectives 5, 6 and 7. The impacts on culture and environment will also be determined by car usage. As noted, despite the presence of a bus stop, car usage among local residents is high and bus usage low. This has not been considered.</p> <p>5) SA objective 3 is listed as uncertain positive. The ""positive"" rating depends on their being places at local schools. If the places do not appear, this will be a negative score. Given the uncertainty, why is the score given ""uncertain minor positive"" when ""uncertain minor negative"" is equally plausible? The rating is biased and should be corrected."</p>	<p>the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>The site is not identified as containing a water body. No evidence suggests otherwise.</p> <p>It is acknowledged that in some proformas, justification text is missing from some of the SA objectives. This will be corrected in the next iteration of the SA Report.</p> <p>SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape and 7: heritage do not specifically relate to transport. Sustainable transport is instead considered under SA objectives 4: economic growth and 10: climate change mitigation.</p> <p>With regard to SA objective 3: education, it is unknown whether places will be available or not in local schools. Therefore, the effects will remain uncertain. A minor positive effect is used instead of a minor negative effect, to acknowledge that the site is within 800m of a school.</p>
39066721	Q8 of the questionnaire	<p>"The interim Sustainability Appraisal Report ('iSA') offers preliminary assessment of sites. Tarmac's interests relate to three sites – numbers 59858, 59864 and 59866. Our comments relate solely to their appraisal in the iSA. We note that none of the Tarmac sites are summarised in paragraph 5.41 of the iSA as being poorly performing.</p> <p>The three Tarmac sites represent alternative scale options on the site of the Medway Cement Works for which planning permission was granted in 2001 and which remains extant following implementation. The sites represent cumulative development options, with site 59866 being the largest, capable of accommodating up to around 4,000 homes, supported by social, community and educational facilities, together with substantial open and natural space. Other than in relation to sustainability appraisal objective 3, the sites perform equally against the assessment objectives.</p> <p>The iSA analysis is undertaken at a broad scale, without the benefit of understanding of the prospective development. No criticism is made of that given the early stage of plan making. Opportunities exist, however, to refine the SA at subsequent plan-making stages. In support of that, a Prospectus is submitted in parallel with our response, demonstrating how the site responds positively to the sustainability objectives. Our responses below reflect the opportunity presented in that Prospectus.</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Mitigation is not taken into consideration in the 'policy-off' appraisals of the reasonable alternative development site options contained within Chapter 5 and Annex 1 of the Interim SA Report. If the sites are allocated at a later stage in the plan-making process and policy wording provided, mitigation will be taken into account through 'policy-on' appraisals of the sites.</p> <p>With regard to SA objective 1: health and wellbeing, sites 59858, 59864 and 59866 all receive mixed significant positive and uncertain significant negative effects because while they are in close proximity of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility, they contain Holborough Park, which comprises Holborough Cricket Pitch and Football Pitch, which could be lost as a result of development although this is uncertain. As mentioned in the previous paragraph, mitigation is not yet taken into account at this stage.</p> <p>All effects against SA objective 3: education are recorded as uncertain. The site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will</p>

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		<p>SA1: the sites score as significantly positive and uncertain significant negative. This generic assessment reflects the proximity of mixed-use sites to existing healthcare facilities, an analysis that we support. The Tarmac sites are of sufficient scale to offer new or expanded facilities to serve new residents, ensuring no adverse impacts on users of existing facilities. An uncertain significant negative effect is assumed. Whilst the existing Holborough cricket ground is within the sites, that facility is to be retained and enhanced, alongside provision of substantial new open space and recreational facilities. In the largest development scenario, a substantial new country park is proposed serving the wider Snodland area. The uncertain significant negative outcome can therefore be reasonably regarded as pessimistic and should be considered a positive outcome.</p> <p>SA2: the sites score as a minor negative outcome. As the iSA notes at paragraph 5.10, larger sites have the potential to incorporate new provision of community facilities and services. The submitted prospectus demonstrates that new development can be well-served by new facilities which support active travel choices, ensuring that positive SA outcomes can be secured.</p> <p>SA3: this is the only objective where the three sites score differently: the larger site scoring better. We support the iSA's analysis of positive outcomes, but do not consider these to be uncertain. Provision is made for new schooling which can support new development, with the submitted Prospectus demonstrating how provision can be made for new education facilities at the heart of new development.</p> <p>SA4: we support the ISA's analysis, further noting that new public transport and active travel mode provision is integral to the Medway Valley opportunity. Opportunities also exist for proportionate provision of commercial spaces within new development.</p> <p>SA5: the analysis recognises that opportunities exist for mitigation of potential biodiversity impacts. The site offers strong prospects for positive biodiversity net gain, including delivering up to 60% of the site area as open or natural green space. We therefore do not consider these benefits to be uncertain.</p> <p>SA6: the proximity of the sites to the AONB lead to an uncertain significant negative outcome. We agree that through detailed design, but also strategic advanced mitigation measures, any such uncertainty can be addressed. A substantial new country park ensures no built development encroachment within the AONB.</p> <p>SA7: significant opportunities exist to both conserve and enhance the cultural heritage of the site, including opportunities for positive interpretation of industrial heritage. We consider the uncertain significant negative assessment to be pessimistic.</p> <p>SA8: we disagree with the analysis that the site is significantly within flood zone 3 and believe this to be an error in the analysis. The prospectus demonstrates that existing water bodies are retained, with opportunities for new sustainable drainage systems to be implemented.</p>	<p>depend on there being capacity at those schools to accommodate new pupils" [emphasis added].</p> <p>With regard to SA objective 8: water, all three sites receive an uncertain significant negative effect because they are all within an area with a 1 in 30 year risk of surface water flooding. All three sites contain water bodies and sites 59864 and 59866 also overlap Source Protection Zone 1.</p> <p>With regard to SA objective 9: soils, TMBC informed LUC that all three sites comprise greenfield land. Land where minerals have been extracted is not defined as previously developed/brownfield land in the National Planning Policy Framework.</p>

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		<p>SA9: whilst part so the sites are in agricultural use, much of the site has bene previously quarried and does not exhibit high quality agricultural land. Much of the site is therefore not greenfield in the conventional sense. The site benefits from extant planning permission for a cement works and quarry, to be restored to wetland and thus represents a fall-back position.</p> <p>SA10: the iSA recognises existing provision of public transport, which would be further enhanced to support new development. Strategic development increases the potential for internalised travel patterns and use of active travel modes, offering further SA benefits. The strategic scale of development can help to support rail services, including the existing HS1 services at Snodland.</p> <p>SA11, SA12: we support the iSA analysis.</p> <p>SA13: the recently published Kent Minerals and Waste Local Plan review proposes to delete the specific safeguarding of the Medway Valley Cement Works (KMWLP policy CSM3) reflecting the status of the extant permission. Any alternative use of the site would rely upon an analysis against other policies within the KMWLP.</p> <p>SA14: we consider the analysis of the sites to be pessimistic, since the potential exists for the delivery of significant numbers of new dwellings supported by infrastructure, facilities and open space. Given the acute housing needs identified in the HNS and the prospect for strategic development to deliver quicker than smaller sites (as per the HMDS), a significant positive outcome should be anticipated."</p>	
42337889	Q8 of the questionnaire	<p>"Some general points of concern</p> <p>Inconsistency: Some sites have been give different assessments but the commentary is exactly the same.</p> <p>Access: It is stated that access to schools or public transport are within a specific distance of the designated sites but this cannot be the case for the whole area of the site.</p> <p>Local knowledge: Equally, access to a school site may be via a woodland or for public transport to a bus stop with limited services – there is no way that all new residents would use these services.</p> <p>Health: There is now no GP service in West Malling, the closest is Kings Hill or Leybourne. The Sustainability Objective also conflates health facilities with access to sporting facilities/playgrounds!</p> <p>Highways: Sustainability Appraisal objectives do not include impact on the local road system.</p> <p>Specific points of concern (by Sustainability Appraisal objective)</p> <p>59594 – 34 houses</p> <ul style="list-style-type: none"> • Objective 10: I question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. 	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>The GP surgeries data used to inform the Interim SA Report does not acknowledge that West Malling GP surgery will be closed in the future. In the next iteration of the SA Report, the GP surgery will be removed from the GIS data and the proformas for the sites affected updated.</p> <p>There is considered to be a lot of crossover between access to healthcare facilities and areas of open space and sports facilities, as these can encourage more physical activity with beneficial effects on people's health. The site assessment criteria for SA objective 1: health and wellbeing are considered suitable and appropriate.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA</p>

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		<p>• Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59602 – 19 houses</p> <p>• Objective 3: I question if this is within 800m of a primary or secondary school.</p> <p>• Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59603 – 30 houses</p> <p>• Objective 3: I question if this is within 800m of a primary or secondary school.</p> <p>• Objective 9: As this includes site 59602 in its entirety which is classified as greenfield, how can this site be assessed as brownfield?</p> <p>• Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size. Does it also double-count the site it encompasses: 59602?</p> <p>59699 – 260 houses</p> <p>• Objective 1: With the closing of West Malling surgery the site is not within 800m of an existing health facility.</p> <p>• Objective 4: The site is not all within 400m of a bus stop, nor would all 260 households be able to use this limited bus service or cycle. It is also unclear what business opportunities this mixed-use site would deliver and therefore its impact on the local economy.</p> <p>• Objective 6: This should be significant negative as it will have a major impact on the landscape.</p> <p>• Objective 10: The majority of the site is not within 400m of a bus stop and the bus service is extremely limited – it would increase car/highway movements significantly.</p> <p>59716 – 28 houses</p> <p>• Objective 1: Contradictory, no explanation is given. It can't be both significantly negative and significantly positive.</p> <p>• Objective 10: I question if all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited.</p> <p>• Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size.</p> <p>59733 – 27 houses</p>	<p>Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The proformas for each site accurately state whether they are within 800m of a primary school or not.</p> <p>The appraisal of site 59603 does not double-count site 59602, which it encompasses. Each of these sites has been appraised separately.</p> <p>With regard to SA objective 9: soils, site 59602 comprises brownfield land. In the next iteration of the SA, the GIS analysis will be updated to reflect this.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA, the justification text will be added to the proforma. In accordance with the SA methodology set out in Chapter 2 of the Interim SA Report, sites can have mixed effects.</p>

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		<ul style="list-style-type: none"> • Objective 9: Brownfield? • Objective 10: Majority of site not within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited. • Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size. <p>59406 – 20 houses</p> <ul style="list-style-type: none"> • Objective 2: This should be the same as for site 59596 ie significant negative, as it is immediately next door. • Objective 3: Stated that this is within 800m distance walking, but this would be through woodland, dark at each end of a Winter's Day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. • Objective 9: I question if this is all brownfield land. • Objective 14: I question why a positive, we don't believe the site would give a mix of tenures due to its size. <p>59596 – 23 houses</p> <ul style="list-style-type: none"> • Objective 3: Stated that this is within 800m distance walking, but this would be through woodland, dark at each end of a Winter's Day and very muddy if weather is inclement. It is also inconsistent – the site across the road (59648) is classified as a minor negative. • Objective 14: I question why a positive, I don't believe the site would give a mix of tenures due to its size. <p>59648 – 17 houses</p> <ul style="list-style-type: none"> • Objective 9: I question if this is all 'brown field'. • Objective 14: I question why a positive, I don't believe the site would give a mix of tenures due to its size. <p>59649 – 9 houses</p> <ul style="list-style-type: none"> • Objective 3: This should be the same as site 59648, ie negative? as it is immediately next door. • Objective 9: We question if this is all 'brown field'. • Objective 14: We question why a positive, we don't believe the site would give a mix of tenures due to its size." 	
42802177	Q8 of the questionnaire	"Given the inconsistent numbering, it is difficult to assess the combined impact on the village of Hildenborough of the 23 sites listed for development. It would appear that there is the belief that there is the potential for at least 2,120 homes, covering 268 hectares of mostly green belt land; this is more than 1% of the whole of Tonbridge and	All sites are considered reasonable alternative development site options. All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in

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		<p>Malling. The B245, and other local services and infrastructure, cannot easily be scaled up to support this scale of additional development. The assessment criteria for the individual sites seems inconsistent, and it seems off to equally weight the criteria which is the implicit methodology.</p> <p>It would seem evident that ALL of the Hildenborough sites fail to deliver key sustainability objectives (as defined in the SA framework): SA Objective 1 - To improve human health and well-being; SA Objective 2 - To improve equality and access to community facilities and services; SA Objective 4 - To encourage sustainable economic growth, business development, and economic inclusion across the borough; SA Objective 5 - To protect and enhance biodiversity and geodiversity; SA Objective 6 - To protect and enhance the borough's landscape and townscape character and quality.</p> <p>The Sustainability Appraisal Report correctly identifies 4 out of 23 Hildenborough sites as being less sustainable than others as they are expected to have significant negative effects across at least six different SA Objectives. Given Hildenborough's unique situation, and dearth of services, it is suggested that more sites should be considered similarly as reflected in recent planning reports.</p> <p>As an example: It is unclear why Site 59669 is assessed to have a 'significantly positive' impact on SA Objective 1; Site 59679 should be assessed to be in a Poor Accessibility Band (as Site 59669); Planning permission was refused for site 59669 in Oct 21 (TM/21/02831/FL, TM/21/02834/LB). The 'employment development' benefits were shown to be minimal, at best."</p>	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Site 59669 is not assessed in the SA as having a significant positive effect in relation to SA objective 1: health and wellbeing. It is recorded as having a mixed uncertain significant negative and minor positive effect. In the next iteration of the SA Report, this will be amended to a minor positive effect only. The uncertain significant negative effect is as a result of the site containing an area of open space. However, the site does not contain an open space, just overlap one. The GIS analysis will be refined so that sites overlapping open spaces are not recorded as containing open spaces. The site receives a minor positive effect because it is within 800m of an existing area of open space and walking paths.</p> <p>In the Urban Capacity Study (July 2022), site 59679 is recorded as falling within the Good Accessibility Band whereas site 59669 is recorded as falling within the Poor Accessibility Band. This information has fed into the SA.</p>
42662465	Q8 of the questionnaire	The council disagrees with SA of site 59811 as promoting health and wellbeing – would harm Green Belt, surrounded by footpaths and open countryside. Agree that on all other measures it would represent a negative impact to the identified strategic assessments. As off-grid, most likely domestic heating oil would be used in any large-scale development which would harm air quality.	Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.
42527265	Q8 of the questionnaire	<p>"Site 59791</p> <p>SA1 is incorrect. There is no health facility within 800 mtrs.</p> <p>SA3 is incorrect. There is no secondary school within 800mtrs which is an issue as the bus service is not secure. The primary school is already full and current students already need to travel to schools outside of the area.</p> <p>SA6. The site rises to an AONB and an SSSI risk area. It is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8. The gradient of the site means that by changing the land from farmland (which soaks up water) to buildings, means that surface water would drain to the houses below increasing the risk of flooding in the village. KCC already state that the Southern Water system cannot cope with the amount of water being currently passed to it</p>	<p>The proformas for sites 59791 and 59792 state that they are either within 800m of an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both). Specifically, both sites are within 800m of an area of open space and some walking paths. The SA acknowledges that both sites contain an area of open space that could be lost as a result of development, although this is uncertain. The overall effect for both sites against this objective is mixed uncertain significant negative and minor positive.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore,</p>

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		<p>during extreme weather events. This was reported to them as recently as 21/09/2022 under their Ref No: 4431246</p> <p>SA10 is incorrect. There may be a bus stop within 400 mtrs, but there is only a bus twice a week.</p> <p>Your hierarchy statement says that 'rural' areas would not have major development.</p> <p>Also, with the lack of buses, more cars are needed. The road infrastructure is already unable to cope with the increase in traffic caused by the Peters Village development and the bridge. KCC have looked at possible solutions to solve the immediate problem with a one way system. However, this will not be sufficient to accommodate any further development in the area. The only access for construction vehicles would be through the High Street or Borstal which are both restricted and totally impractical.</p> <p>Site 59792</p> <p>SA1 is incorrect. There is no health facility within 800 mtrs.</p> <p>SA3 is incorrect. There is no secondary school within 800mtrs which is an issue as the bus service is not secure. The primary school is already full and current students already need to travel to schools outside of the area.</p> <p>SA6. The site rises to an AONB and an SSSI risk area. It is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8. The gradient of the site means that by changing the land from farmland (which soaks up water) to buildings, means that surface water would drain to the houses below increasing the risk of flooding in the village. KCC already state that the Southern Water system cannot cope with the amount of water being currently passed to it during extreme weather events. This was reported to them as recently as 21/09/2022 under their Ref No: 4431246</p> <p>SA10 is incorrect. There may be a bus stop within 400 mtrs, but there is only a bus twice a week.</p> <p>Your hierarchy statement says that 'rural' areas would not have major development.</p> <p>Also, with the lack of buses, more cars are needed. The road infrastructure is already unable to cope with the increase in traffic caused by the Peters Village development and the bridge. KCC have looked at possible solutions to solve the immediate problem with a one way system. However, this will not be sufficient to accommodate any further development in the area. The only access for construction vehicles would be through the High Street or Borstal which are both restricted and totally impractical."</p>	<p>all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Neither site has been identified as being at risk of flooding, including surface water flooding.</p> <p>With regard to SA objective 6: landscape and townscape, site 59792 already receives an uncertain significant negative effect. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site is recorded as having a negligible effect as it is within Flood Zone 1 (i.e. not at risk of flooding) and does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section in the SA entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
38330753	Q8 of the questionnaire	<p>"Site 59791 and 5979</p> <p>SA1: The medical centre quoted, does not exist at the present time or in the near future. The local GP surgery is unable to cope with the</p>	<p>The proformas for sites 59791 and 59792 state that they are either within 800m of an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not</p>

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		<p>present level of patients, any additions could reduce the service to a dangerous level. The site is within an area of open space and much needed for the well-being of the local residents, including allotment space.</p> <p>SA2: The exit roads from the development would come out onto a single/narrow country lane with bad visibility.</p> <p>SA3: The primary is full and there are no secondary schools within 3 miles.</p> <p>SA5: The taking of agriculture land for would not enhance the well-being of local residents, but also reduce food supplies.</p> <p>SA6: The AONB mentioned is only 100 mtrs from the proposed development and this development will have an effect on local wildlife, including badgers. The area also rises to an SSSI risk area and is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8: The rainfall on the North Downs which is at present absorbed by agricultural fields would not have any natural soak-away if these fields are replaced by roads and properties. The gradient means that surface water would drain to the houses below increasing the risk of flooding the in the village. KCC already state that the water system cannot cope with the current amount of water passed into it during extreme weather events, drains are already becoming overloaded, causing flooding towards the river.</p> <p>SA10: There is no bus service, the bus stop is now redundant. This means that residents of any new properties would need to use their cars for all journeys, therefore increasing gas emissions. This is not a minor positive, but a major negative.</p> <p>SA11: The lack of public transport and the increased use in private vehicles will only increase emissions which will additionally contribute to climate change and NOT minimise any impact.</p> <p>SA12: Air quality in Wouldham has been a bone of contention and more vehicles with the congestion they bring will only add to the poor air quality.</p> <p>To summarise these answers to sites 59791 and 59792. It is very obvious that these sites are not suitable for housing due to the lack of infrastructure, including no schools, no medical centre and no bus service. The road infrastructure is already unable to cope with the increased traffic caused by Peters Village and the bridge. KCC have continually investigated options for road improvements but are unable to implement any solution even to alleviate the present traffic problems."</p>	<p>both). Specifically, both sites are within 800m of an area of open space and some walking paths. The SA acknowledges that both sites contain an area of open space that could be lost as a result of development, although this is uncertain. The overall effect for both sites against this objective is mixed uncertain significant negative and minor positive.</p> <p>The SA is too high-level to give consideration to sight lines.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to the respondent's comment on SA objective 5: biodiversity and geodiversity, agricultural land is dealt with separately under SA objective 9. Sites 59791 and 59792 are recorded as having significant negative effects in relation to SA objective 9L soils, as they are greenfield and contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regard to the respondent's comment on SA objective 11: climate change adaptation, sustainable transport is considered separately under SA objective 10: climate change mitigation. Sites 59791 and 59792 receive minor positive effects in relation to SA10, as they are more than 800m from a railway station but within 400m of a bus stop. Air quality is dealt with separately under SA objective 12: air. With regard to SA12, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). The sites listed are not within 100m of an AQMA.</p> <p>The SA uses 500m as a threshold for determining effects on the AONB. Due to the fact both sites are within 500m of an AONB, both receive an uncertain significant.</p> <p>Neither site has been identified as being at risk of flooding, including surface water flooding.</p> <p>With regard to SA objective 10: climate change mitigation (and SA objective 4: economic growth), the criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
42684641	Q8 of the questionnaire	"I have answeredon some sites showing my answers . I do not have time to go through each one . I will say with this number of houses water will be an issue especially by 2040 and I don' t think this is taken seriously enough.	<p>Appendix C of the Interim SA Report contains some baseline information on water.</p> <p>Site 59637 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8: water, as it contains land with a 1</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>59637 Outskirts of Hadlow. Flood Zone 3 sump area for water. No rail service not a great bus service. Tight road access to the A26 which will be packed with cars . Not one of the brightest ideas.</p> <p>59691 Wedged between J4 and another round surrounded by water in zone 3. I would not want any child breathing in air form these potential houses.</p> <p>59669 Near Hildenborough Rail sation. great site careful build as prone to flooding? on a slope? This would help with co2 levels as no need to drive to the station!</p> <p>59763 This is part of a whole site near Eccles. I still think building here would be really interesting as the water features around here would be fabulous. Expensive build as all houses would need to be raised .</p> <p>59783 The other side of the road to the station- a bit further away. Greenbelt and not a great shaped plot. 59669 a much better site in Hildenborough.</p> <p>59799 Is this near a heritage site? Over a stream are you planning watermills? Think again I would suggest.</p> <p>59800 and 59802 both extensions to Kings Hill so not a bad idea locations not ideal but plant lots of trees. It could be a lovely site.</p> <p>59806 a site between Hadlow and Mereworth Spread across the a228 High Flood risk and along with 50811 and 59637 you have just build on good farmland and built the 9000 homes. All cars would have to drive to a rail station A26 is the only major road and the congestion would be a nightmare. This is prime farming land and to buildings here would be an eyesore for miles around- especially the Oxenhoath site. NO NO NO</p> <p>59818 Burham what a delightful Kent Village- the most glorious views and you want to build how many home near the river? On aesthetic grounds . No and nowhere near a rail station and bus route .Car or water transport only then. No</p> <p>59827 this site is not near any amenities, could flood and is in a sleepy kent village NO. There were s couple of sites in Plaxtol which would be</p>	<p>in 30 year risk of surface water flooding. The site is also recorded in the SA as receiving a significant negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band. The SA is too high-level to consider road width, and the Council will commission additional evidence on matters including traffic.</p> <p>Site 59691 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding. We note the site is adjacent to main roads. However, as it is not within 100m of an Air Quality Management Area it receives a negligible effect in relation to SA objective 12: air quality.</p> <p>Site 59669 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to site 59783, Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59799 is recorded in the SA as receiving a significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded on the Kent Historic Environment Record. As such, there is potential for it to have an adverse effect on the historic environment. The site is also recorded as receiving a significant negative effect in relation to SA objective 8, as it contains a watercourse and is also at risk of surface water flooding.</p> <p>Site 59806 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains water bodies and land with a 1 in 30 year risk of surface water flooding. Sites 59806 and 59637 also receive significant negative effects in relation to SA objective 9: soil, as they are greenfield and contain a significant proportion of Grade 1 or 2 agricultural land (best and most versatile agricultural land). Site 59811 receives an uncertain significant negative effect because it is greenfield and contains a significant proportion of Grade 3 agricultural land. The uncertainty acknowledges the fact it is unknown whether the site comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land. All three sites fall within the Poor Accessibility Band, as recorded in the Urban Capacity Study, and so receive significant negative effects in relation to SA objective 2: services and facilities. Sites 59806 and 59811 receive minor negative effects in relation to SA objective 10: climate change mitigation, as they are more than 800m of a railway station and 400m of a bus stop. Site 59637, however, is recorded as having a minor positive effect in relation to SA objective 10 as although it is more than 800m from a railway station, it is within 400m of a bus stop.</p> <p>Site 59818 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains water bodies and</p>

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		<p>infill and this village has a post office . Relook at these if you want to build around this area. They would no flood either.</p> <p>59839 Near Barming rail station and a good site.</p> <p>59749 The northern part of this plot would flood probably as Flood zone 3/1. This is still well away from a rail station on green belt land and agricultural land. The use of cars on this site would be the way to go and I think is a poor choice.</p> <p>TMBC have in the above choices chosen to build mainly on greenfield sites north of Hadlow with poor access to rail services and a mediocre bus service. Cars would be the transport of choice. The main A26 is accessible for this volume of Traffic through Hadlow Village – where you are also planning to build a large no of homes on flooded fields, which form a sump for the area around.</p> <p>These choices are very poor indeed. It is imperative that homes are build near good transport links and that means a good rail service. There are at least four excellent rails links in this borough. You will not be able to achieve car usage reduction if you continue with these sites. All councils keep hammering about bike usage. I am a fit 62 year old and I would not ride a bike to my local co-op in Martin Hardie way as Cuckoo Lane is too dangerous. So if I am not a user this is NOT a good omen. People take the easy route -if it is cheaper and faster (as you don't park a car) to walk to a rail station or have a very frequent bus route- people will use that option. So concentrate your plans on areas with rail services. This is the main reason why people move here quick access to London.</p> <p>The above choices are NOT sound and will only cause more road usage.</p> <p>59796 the Lidl site good as you just roll out of bed to the station.</p> <p>59878/9 the station car park great position but people need to park so build a multi storey on the other car park site. 59815 really stocks green?"</p>	<p>land with a 1 in 30 year risk of surface water flooding. The site is also recorded in the SA as receiving a significant negative effect in relation to SA objective 6: landscape and townscape, as it is within 500m of the AONB. It also receives a significant negative effect in relation to SA objective 2: services and facilities, as it falls within the Poor Accessibility Band, as recorded in the Urban Capacity Study. However, the SA acknowledges under SA objective 10: climate change mitigation that the site is more than 800m of a railway station but within 400m of a bus stop.</p> <p>Site 59827 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding. The site is also recorded in the SA as receiving a significant negative effect in relation to SA objective 2: services and facilities, as it falls within the Poor Accessibility Band. It is also recorded as having a minor negative effect in relation to SA objective 10: climate change mitigation, as it is more than 800m from a railway station and more than 400m from a bus stop and cycle route.</p> <p>The SA acknowledges that site 59839 is within 800m of a railway station, under SA objective 10: climate change mitigation.</p> <p>Site 59749 is recorded in the SA as receiving a significant negative effect in relation to SA objective 8, as it contains land with a 1 in 30 year risk of surface water flooding. The site is also recorded as having a minor negative effect in relation to SA objective 10: climate change mitigation, as it is more than 800m from a railway station and more than 400m from a bus stop and cycle route. As mentioned already, Green Belt is not covered by the SA. With regard to agricultural land, the site receives a significant negative effect against SA objective 9: soil, as it is greenfield and contains a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>TMBC is considering brownfield sites, as well as greenfield sites. The Interim SA Report provides an appraisal of all reasonable alternative development site options. No allocations have yet been determined.</p> <p>Respondent has not raised any specific points regarding the SA for site 59763, 59800, 59802, 59796, 59878, 59879 and 59815.</p>
42729441	Q8 of the questionnaire	<p>As mentioned before the existing developed Kings Hill should not be added to, it has not enough green space, it was planned and accepted as is, its facilities are overrun and do not meet current capacity requirements. The golf course should not be touched, gives employment and recreational area and sold as part of the original plan which TMBC had major input to.</p>	<p>The SA provides an appraisal of all reasonable alternative development site options, some of which are located in and around Kings Hill. The Council will determine which sites to allocate and not allocate.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
42469985	Q8 of the questionnaire	Please do not build on anything further which is green, brown land only!	The SA provides an appraisal of all reasonable alternative development site options, including whether they are on brownfield or greenfield land. The Council will determine which sites to allocate and not allocate.
42832833	Q8 of the questionnaire	<p>"The Site has been assessed through the Interim Sustainability Appraisal (site reference: 59773) and there are some parts of the appraisal that we agree and support, whilst others we consider incorrect.</p> <p>Our comments on the relevant objectives (that we do not agree with) are set out in response to the Interim Sustainability Appraisal - Annex 1."</p>	<p>Site 59773 has been appraised in line with the site assessment criteria as outlined in Appendix D of the Interim SA Report. In accordance with the site assessment criteria, the site receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of open space and walking paths. Housing delivery is considered separately under SA objective 14: housing.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022). Housing delivery is dealt with separately under SA objective 14: housing. This is a 'policy-off' appraisal and so consideration is not given to mitigation, such as financial contributions towards community facilities and public transport.</p> <p>With regard to SA objective 3: education, again this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. contributions towards education provision). This ensures all sites are appraised on a consistent basis. All effects against this objective are recorded as uncertain due to uncertainty regarding school capacity.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Although it is noted that an SME would undertake the construction work, this is an appraisal of the site and does not take into consideration who is developing the site.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape and 7: heritage, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain and landscaping). If the site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-off' basis.</p>
43487649	Q8 of the questionnaire	<p>"1.2.33 In respect of this question, our client only wishes to comment upon site 59771. In this regard, we support the double positives that will be achieved in respect of the provision of housing and soil resourcing and the single positives regarding reduction in greenhouse emissions, and housing mix. However, we believe the SA takes an overly negative stance in respect of some wider objectives.</p> <p>1.2.34 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p> <p>1.2.35 The desktop nature of the site assessment is also of concern. Based on a human judgement there are not any significant heritage or</p>	<p>Site 59771 contains green infrastructure assets in the form of trees and thick vegetation. For this reason, it receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p> <p>SA is a desk-based, strategic assessment and all reasonable alternative development site options have been appraised on a 'policy-off' basis. This means they are appraised on their physical constraints only and not mitigation (e.g. Biodiversity Net Gain) or</p>

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		<p>landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>1.2.36 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information."</p>	<p>supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail.</p>
43514945	Q8 of the questionnaire	<p>"In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we support the double positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.35 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment and this should represent a strong positive.</p> <p>1.2.36 The desktop nature of the site assessment is also of concern. Based on a human judgement it is clear that there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>1.2.37 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information"</p>	<p>Site 59664 is located within 1km of two Local Wildlife Sites (Oaken Wood, Barming and Kings Hill Golf Course, Catterling & Hoath Woods). For this reason, it receives a minor negative effect in relation to SA objective 5: biodiversity and geodiversity. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure..</p> <p>SA is a desk-based, strategic assessment and all reasonable alternative development site options have been appraised on a 'policy-off' basis. This means they are appraised on their physical constraints only and not mitigation (e.g. Biodiversity Net Gain) or supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail.</p>
41998081	Q8 of the questionnaire	<p>"In respect of this question, we support the double positive that will be achieved in respect of the provision of housing, reduction in green house gas emissions, soil resourcing and access to education facilities owing to the proximity to Borough Green and Wrotham Schools.</p> <p>1.2.55 However, we believe the ISA takes an overly negative stance in respect of some wider objectives.</p> <p>1.2.56 For example, the land is currently of no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment than can otherwise be expected and so this should represent a further positive for redevelopment.</p> <p>1.2.57 The desktop nature of the site assessment is also of concern. Based on a human judgement there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>1.2.58 The notion that this former quarry is positively contributing to landscape character and quality and justifies a negative score based on being 500m from the AONB boundary is unsound. The land is not within the designated landscape and provides little or no positive landscape features.</p> <p>1.2.59 Similarly, the site being within 250m of a listed building (The Old Manor House List UID: 1235988) is not justification for a negative score and the redevelopment of the site would have no material impact upon the setting of the heritage asset given the lack of intervisibility. This listed building is protected for being a 16th Century Farmhouse yet the setting has seen any wider characteristics of a</p>	<p>Site 59732 is incorrectly recorded as containing a green infrastructure asset. This is due to the fact it is adjacent to a green infrastructure asset which partially overlaps the site and so the GIS analysis identified the site as containing a green infrastructure asset. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect. This is due to the fact it is within 1km of a Local Wildlife Site (Bourne Valley Woods) and some areas of Ancient Woodland. All negative effects against this objective are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure.</p> <p>SA is a desk-based, strategic assessment and all reasonable alternative development site options have been appraised on a 'policy-off' basis. This means they are appraised on their physical constraints only and not mitigation (e.g. Biodiversity Net Gain) or supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail.</p> <p>As the site is within 500m of the AONB, it could have an adverse impact on the AONB. Therefore, it receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. This is in accordance with the site assessment criteria.</p> <p>With regard to SA objective 7: heritage, the site is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. Therefore, it receives an uncertain significant negative effect in relation to this objective. SA utilises a precautionary approach and as this is a 'policy-off' appraisal, consideration is not given to mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>farmstead being lost many years previous. Accordingly, we say no heritage harm would occur.</p> <p>1.2.60 The site is not within Flood Zone 3 nor vulnerable to surface water flooding and development would result in an overall betterment given the need to exceed greenfield conditions.</p> <p>1.2.61 In short, it is essential that sites are properly appraised on a qualitative basis to ensure that decisions are made on credible information. At present it appears that</p> <p>Page 16 of 26</p> <p>the ISA assessments are all software generated and missing key human judgement."</p>	<p>With regard to SA objective 8: water, the site contains land with a 1 in 30 year risk of surface water flooding. Therefore, it is correct that the site receives a significant negative effect in relation to this objective.</p> <p>All reasonable alternative site options have been appraised in line with the site assessment criteria contained in Appendix D of the Interim SA Report. A GIS model was developed to appraise each site against these criteria, so as to ensure consistency and no introduction of human error. The appraisals are 'policy-off', as this ensures they are all appraised on a consistent basis. If a site is allocated via policy in the Local Plan containing mitigation measures, it will be appraised on a 'policy-on' basis.</p>
43779649	Q8 of the questionnaire	<p>"Site Identification Number: 59709</p> <p>Berkeley has some concerns with the ISAR scorings given to this site as explained below.</p> <p>SA Objective 2: The outcome of objective 2 is accepted. Berkeley strongly believes that access to community facilities and services will be improved post development of the site. Two primary schools are located less than 1km from the site, in addition to a secondary school being located approximately 1.8km from the land at Dark Hill Farm.</p> <p>SA Objective 5: Berkeley would ask the council to reconsider the assessment of objective 5 (to protect and enhance biodiversity and geodiversity) as uncertain significant negative. The site's definition as a green infrastructure asset is questionable given the limited public access to it. While Berkeley appreciates the site lies within close proximity to a Local Wildlife Site, it is not within 250m of one or more internationally or nationally designated sites. Development will be unlikely to cause disruption to the Local Wildlife Site.</p> <p>Berkeley endeavours to achieve 10% net-biodiversity gain on all projects and the land at Dark Hill Farm is no exception. There is an opportunity as part of the development to retain, enhance and create areas of green space on site and will do so with the upmost respect for the current landscape setting. It is incorrect to assume that development will worsen the surrounding natural environment and not enhance it.</p> <p>SA Objective 6: Berkeley disagrees with regard to scoring the site with an uncertain significant negative for objective 6 – to protect and enhance the borough's landscape and townscape character and quality.</p> <p>Greater certainty about the impacts of development on the landscape is provided by landscape assessment work undertake by Murdoch Wickham Associates for Berkeley. The analysis explains that the land comprises paddocks with areas of scrub and derelict farm buildings. The characteristics of the site are not typical of the wooded, traditional farmed landscape associated with the Greensand Ridge within the Kent Downs AONB.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of Bourne Valley Woods Local Wildlife Site and Ancient Woodland. The site also contains existing green infrastructure assets (thick vegetation).</p> <p>Although development of this site offers the opportunity to achieve biodiversity net gain, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is located within the North Downs AONB.</p> <p>With regard to SA objective 7: heritage, the site is recorded as containing Neolithic finds, in addition to falling within 250m of a number of heritage assts. Therefore, it receives a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertain significant negative effect is as a result of the site containing land with a 1 in 30 year risk of surface water flooding. Further to this, there is some overlap with a watercourse in the north west of the site and therefore it is uncertain what effect development might have on the watercourse in terms of water quality.</p> <p>With regard to SA objective 9: soils, the site receives an uncertain significant negative effect because it comprises Grade 3 agricultural land but it is unknown whether it is Grade 3a (high quality) or 3b (not classified as high quality) agricultural land. The criteria for this</p>

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		<p>Residential development on the western fringes of Borough Green is visible in views to the site and other urbanising influences including traffic noise associated mainly with the A25 and the nearby residential development in the former quarry site to the south west further detract from the site's contribution to the AONB.</p> <p>Overall, the site has a relatively high degree of visual enclosure, in particular the fields north of the footpath, which runs across the centre of the site. The northern hedge provides an effective screen between the site and the A25. There are potential views to the land from the west in the vicinity of Oldbury Hill, but this is a densely wooded area, and no viewpoints were identified.</p> <p>The site does not share the dominant characteristics of the Kent Downs AONB. The site serves a much lower function in comparison to the wider area and the land contributes little to the AONB designation. It is concluded that the development of the Dark Hill Farm site would have a negligible impact on the AONB.</p> <p>SA Objective 7: the scoring the site with an uncertain significant negative for objective 7 due to the site's proximity (being within 250m) to a heritage asset requires further analysis.</p> <p>The site does not contain any designated or non-designated heritage assets. Furthermore, there are no listed buildings directly adjacent to the site. The Borough Green conservation area is located on the eastern side of the town and as such would not be impacted.</p> <p>The site is located approximately 135m from the closest heritage asset in Borough Green, with further Grade II listed buildings, found an additional 20m eastward and still within the urban confines of Borough Green. Ightham Court, a Grade II* listed building (Registered Park and Gardens designation) is located approximately 750m from the site north-westward.</p> <p>There is limited or no intervisibility between the site and the nearby heritage assets. The land at Dark Hill Farm will have a negligible impact on any of the surrounding heritage assets and it is incorrect to score the site with an uncertain significant negative, purely based on proximity.</p> <p>SA Objective 8 - The SA assesses the site, in line with objective 8 criteria, to have a 'significant negative' impact on enhancing the quality of water features and resources. The assessment states the site to be either entirely or significantly (i.e. >25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding.</p> <p>While a proportion of the western boundary is part of Flood Zone 3, it is not in excess of 25% of the site. In fact, much less than 25% of the site resides in Flood Zone 3 as this only affects a small area on the western site boundary.</p> <p>Surface water flooding is also determined to affect more than 25% of the site, alongside the land being associated with a 1 in 30-year risk of</p>	<p>objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>

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		<p>surface water flooding. It is evident that only a small proportion of the northern parcel is prone to surface water flooding.</p> <p>Surface water flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures (SuDS) within the design proposal.</p> <p>Overall, whilst there is some flood risk on site, which is accepted, this has the potential to be avoided or suitably mitigated. This means that the impact would be negligible.</p> <p>SA Objective 9 - The SA assessment of objective 9 ranks the site as an uncertain significant negative. An agricultural land classification survey will need to be undertaken to determine whether the Option Land is Grade 3a (best and most versatile) or Grade 3b (not best and most versatile). However, either way this should not prejudice the assessment of suitability, as the site is not currently in productive agricultural use and realistically is not of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed."</p>	
43544961	Q8 of the questionnaire	<p>"It is acknowledged the initial SA site level assessments are necessarily broad brush, and that further refinement with the benefit of site specific assessment is necessary. In many instances the impacts of development for Site 59692 are overstated, and similarly, benefits understated. Our client is in the process of updating the site assessments and masterplan options for this site. We would welcome the opportunity to share this with the Council once complete. This emerging work continues to confirm this site is suitable for housing, with no known overriding constraints to its delivery within the first five years of the plan period post adoption. This builds on the conclusion the LPA reached in proposing this site for allocation under Policy LP25 (x) of the former Reg. 19 Submission Local Plan."</p>	<p>SA is a high-level tool used to identify the likely sustainability effects of a Local Plan. It is one of many factors that feed into the plan-making process.</p> <p>Site 59692 has been appraised in accordance with the site assessment criteria on a 'policy-off' basis. This ensures all sites are appraised on their physical constraints only with no consideration given to mitigation or supporting documents submitted by site promoters. If this site is allocated at a later stage in the plan-making process and policy wording provided, mitigation will be taken into account through a 'policy-on' appraisal of the site.</p>
24986657	Q8 of the questionnaire	<p>"The findings and assessments of each of the sites 59779, 59825 and 59827 made in Annex 1 of the SA are inaccurate and the scoring is misleading. Also as indicated in answers to other questions the SA should have screened out sites in the Green Belt and the AONB as constraints at this iteration of the SA.</p> <p>Comments on the 3 sites in Shipbourne Parish:</p> <p>Common to all three sites 59779, 59825 and 59827</p> <ul style="list-style-type: none"> □ The junctions at both ends of Back Lane are dangerous and Back Lane experiences speeding traffic since the road is used as a cut through to from the A228/A26- to A227 and cross country to the A21 □ The bus stop mentioned in relation to site 59779 is only used at school times and provides no better service than to the other two sites in terms of accessibility to the current school bus route. □ All three are unsustainable and undeliverable unless huge changes are made to the current policies covering conservation and enhancement of this AONB Village in the GB. 	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>The SA is too high-level to consider dangerous road junctions, congestion and speeding traffic, in addition to the gas network, electricity grid and sewage network, but these are things that will instead be considered at planning application stage if the sites are allocated.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does</p>

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		<p>□ The village is not on the gas network so the current electricity grid would need upgrading to sustain any new developments in these sites.</p> <p>□ The pipes for providing water supply are inadequate for new development</p> <p>□ Sewerage and land drainage is also under pressure and overflows are already experienced as mentioned below on site 59827.</p> <p>□ Development of any one of these sites would have a huge impact on the character and landscape of this small Conservation Area status village which is in the AONB and the Green Belt and which has no services other than the small primary School, already oversubscribed.</p> <p>Site 59779:</p> <p>□ Green Belt and the Kent Downs AONB, edge of Shipbourne Conservation Area.</p> <p>□ Poor drainage on southern boundary.</p> <p>□ Access onto Back lane in close proximity to main access to Shipbourne Primary school. Danger to school children and congestion at pick up and drop off times.</p> <p>□ Dangerous junction of Back Lane with the A227.</p> <p>□ Bus stop on the A227 currently only provides a school service.</p> <p>□ There is an active covenant on this land restricting development. It is therefore undeliverable.</p> <p>Site 59825:</p> <p>□ Green Belt, Kent Downs AONB, within the Shipbourne Conservation Area.</p> <p>□ Very open site.</p> <p>□ Dangerous access onto narrow Upper Green Road, or onto Back Lane.</p> <p>□ Proposed mixed development on this site is questionable. There is no identified need for social housing in Shipbourne.</p> <p>Site 59827:</p> <p>□ Green Belt, Kent Downs AONB and the edge of the Conservation area.</p> <p>□ Open site</p> <p>□ There are land drainage issues on this site and a watercourse runs along the southern boundary.</p> <p>□ There are already issues with sewer overflow across the site.</p> <p>□ Dangerous access onto Back Lane or narrow Reeds Lane and dangerous junctions at either end of Back Lane"</p>	<p>not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Sites 59779 and 59827 are recorded as having significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. Site 59827 also contains a watercourse and this is recorded in the SA. Site 59825 receives a negligible effect in relation to SA objective 8, as it is not at risk of flooding.</p> <p>All three sites receive a significant negative effect in relation to SA objective 6: landscape and townscape, as they are within 500m of the AONB. With regard to the Green Belt, this is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to sites 59825 and 59827 and SA objective 7: heritage, significant negative effects are recorded as the sites are within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p>

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42380353	Q8 of the questionnaire	<p>"The findings and assessments of each of the sites 59779, 59825 and 59827 made in Annex 1 of the SA do not accord with local knowledge. Also as indicated in answers to other questions the SA should have screened out sites in the Green Belt and the AONB as constraints at this iteration of the SA.</p> <p>Comments on the 3 sites in Shipbourne Parish:</p> <p>Common to all three sites 59779, 59825 and 59827</p> <ul style="list-style-type: none"> • The junctions at both ends of Back Lane are dangerous and Back Lane experiences speeding traffic since the road is used as a cut through to from the A228/A26- to A227 and cross country to the A21 • The bus stop mentioned in relation to site 59779 is only used at school times and provides no better service than to the other two sites in terms of accessibility to the current school bus route. • All three are unsustainable and undeliverable unless huge changes are made to the current policies covering conservation and enhancement of this AONB Village in the GB. • The village is not on the gas network so the current electricity grid would need upgrading to sustain any new developments in these sites. • The pipes for providing water supply are inadequate for new development • Sewerage and land drainage is also under pressure and overflows are already experienced as mentioned below on site 59827. • Development of any one of these sites would have a huge impact on the character and landscape of this small Conservation Area status village which is in the AONB and the Green Belt and which has no services other than the small primary School, already oversubscribed. <p>Site 59779:</p> <ul style="list-style-type: none"> • Green Belt and the Kent Downs AONB, edge of Shipbourne Conservation Area. • Poor drainage on southern boundary. • Access onto Back Lane in close proximity to main access to Shipbourne Primary school. Danger to school children and congestion at pick up and drop off times. • Dangerous junction of Back Lane with the A227. • Bus stop on the A227 currently only provides a school service. • There is an active covenant on this land restricting development. It is therefore undeliverable. <p>Site 59825:</p> <ul style="list-style-type: none"> • Green Belt, Kent Downs AONB, within the Shipbourne Conservation Area. • Very open site. 	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.</p> <p>The SA is too high-level to consider dangerous road junctions, congestion and speeding traffic, in addition to the gas network, electricity grid and sewage network, but these are things that will instead be considered at planning application stage if the sites are allocated.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Sites 59779 and 59827 are recorded as having significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. Site 59827 also contains a watercourse and this is recorded in the SA. Site 59825 receives a negligible effect in relation to SA objective 8, as it is not at risk of flooding.</p> <p>All three sites receive a significant negative effect in relation to SA objective 6: landscape and townscape, as they are within 500m of the AONB. With regard to the Green Belt, this is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to sites 59825 and 59827 and SA objective 7: heritage, significant negative effects are recorded as the sites are within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p>

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		<ul style="list-style-type: none"> • Dangerous access onto narrow Upper Green Road, or onto Back Lane. • Proposed mixed development on this site is questionable. There is no identified need for social housing in Shipbourne. <p>Site 59827:</p> <ul style="list-style-type: none"> • Green Belt, Kent Downs AONB and the edge of the Conservation area. • Open site • There are land drainage issues on this site and a watercourse runs along the southern boundary. • There are already issues with sewer overflow across the site. • Dangerous access onto Back Lane or narrow Reeds Lane and dangerous junctions at either end of Back Lane" 	
43629217	Q8 of the questionnaire	<p>"Site 59807 – Land off Ashton Way, West Malling</p> <p>The ISA determines that there is an 'Uncertain minor positive (+?)' impact of the site against SA Objective 3, which relates to improving levels of educational attainment and skills and training development. The assessment notes that development could provide contributions to education. Gladman would like to take this opportunity to confirm that, subject to CIL compliance, any education contributions sought by the Council will be secured via a S106 agreement to ensure suitable provision for new and existing residents.</p> <p>Under Objective 5 (to protect and enhance biodiversity and geodiversity), the site is rated as 'Uncertain significant negative (--?)'. The SA states that the site contains an existing green infrastructure asset that could be lost as a result of new development and that the effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>Gladman disagree with this assessment and this representation confirms via the site submission that the Public Right of Way to the south of site will be conserved and enhanced as part of any future development package. All green infrastructure assets on site will be retained and enhanced to ensure the site is well screened with a suitable level of buffering.</p> <p>Under SA Objective 6 (to protect and enhance the borough's landscape and townscape character and quality), the site is rated as 'Uncertain significant negative (--?)'. The SA notes that the site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces, but these effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Gladman do not consider it appropriate to determine unknown impacts as 'significant' when the site does not impact settlements in rural locations, nor does it result in the loss of designated open space.</p>	<p>Site 59807 like all other reasonable alternative development site options, has been appraised on a 'policy-off' basis. This means that consideration has not been given to mitigation. Instead, sites have been appraised on their physical constraints only. This ensures all sites are appraised to a consistent level of detail. Therefore, although the respondent has referred to financial contributions and other forms of mitigation, these will not be taken into consideration at this stage of the plan-making process. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA utilises a precautionary approach. Therefore, impacts can be significant but recorded as uncertain if they are dependent on other factors.</p> <p>The SA is too high-level to give consideration to previous applications for sites, including appeal decisions.</p> <p>Site 59807 receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The 25% threshold only applies to Flood Zones 2 and 3.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". Site 59807 is still expected to have a positive effect in relation to this objective, albeit minor.</p>

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		<p>Development at this location will be sympathetically designed to ensure that the scale and layout of the development mitigates any adverse effects.</p> <p>This is supported by appeal decision APP/H2265/W/20/3254563, which states at paragraph 33 that “due to the topography around the site, its development would have no notable impact on the wider landscape.”</p> <p>Under SA Objective 7 (to protect and enhance the cultural heritage resource), the site’s impact is rated ‘Uncertain significant negative (–?)’ as the site is located within 250m of a heritage asset. The effects are considered uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Tonbridge & Malling Local Plan Reg. 18 Representations 14</p> <p>Gladman disagree with the potential for significant negative impacts on a heritage asset and take the opportunity to confirm that the site can be designed and delivered in a way that is sensitive to the conservation considerations. Gladman recognise that there is the potential for minor negative impacts on the wider setting of St Mary’s Abbey Complex, the Church of St Mary the Virgin, The Lavenders, St Leonards Tower and West Malling Conservation Area, however, this would amount to less than substantial harm (at the lower end of the spectrum) as defined by the NPPF.</p> <p>Under SA Objective 8 (to protect and enhance the quality of water features and resources), the site is considered to have ‘Significant negative (–)/Negligible (0)’ impacts. This considers that the site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding and that the site does not contain a water body or watercourse or fall within a Source Protection Zone.</p> <p>However, the site is not within Flood Zone 3 (see Figure 1) and the small area of surface water flood risk along the north-western boundary does not constitute over 25% of the site (see Figure 2)3.</p> <p>Further, as concluded by the Flood Risk Assessment carried out by Enzygo in support of planning application ref. 19/02856/OA, the development of the site can be achieved with minimal risk from flooding and without increasing flood risk elsewhere.</p> <p>Therefore, Gladman consider the significant negative assessment to be inappropriate and should be considered negligible at the very most.</p> <p>Under SA Objective 14 (to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types, and tenures), the site is considered to have a ‘Minor positive (+)’ impact as the site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or</p>	

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		<p>making as greater contribution towards local housing needs as larger sites would.</p> <p>Gladman disagree that the contribution of up to 75 dwellings, of which 40% will be affordable, should be considered 'minor positive'. Smaller development sites are essential to ensuring a range of housebuilders can operate in an area at one time, boosting the supply of housing across the plan period. Gladman consider that the delivery of up to 75 dwellings, on a site located outside the Green Belt and AONB in a significantly constrained authority, should be considered a significant positive.</p> <p>Furthermore, Gladman are promoting the parcel of land immediately south of this site which in combination, could provide circa 105 units. This larger site therefore has the potential to meet the >100-unit threshold to ensure a 'significant positive' contribution to local housing needs.</p> <p>Site 59814 – West Malling</p> <p>Under SA Objective 3 (to improve levels of educational attainment and skills and training development), the site is considered to have an 'Uncertain minor positive (+?) impact. The assessment notes that development could provide contributions to education. As previously stated,"</p>	
44336545	Q8 of the questionnaire	<p>"We wish to clarify Question 8 as Appendix D of the Interim Sustainability Appraisal ('SA') includes the Site Assessment Criteria, not the findings of the individual site assessments. The individual site assessments are provided at Annex 1: Reasonable Alternative Development Site Options.</p> <p>3.77 Assuming the reference is incorrect within Question 8, we agree and support the assessment of the individual sites within the SA at Annex 1, particularly the assessment of Court Lane Nurseries (Site ID: 59853 / 59857) which against the SA objectives, scores the highest in Hadlow / East Peckham ward.</p> <p>3.78 We have the following further comments to make on the SA Assessment: 1) Hadlow is a sustainable location for growth</p> <p>3.79 In relation to existing settlements in the Borough, the findings of the SA site assessments clearly suggest that Hadlow is one of the most sustainable settlements to accommodate growth within the new Local Plan, against all objectives, given its accessibility to existing services and facilities. This is also illustrated by Hadlow's place in the settlement hierarchy as a Rural Service Centre (Tier 2 settlement).</p> <p>3.80 Furthermore, upon a review of all sites located within the "Hadlow / East Peckham" ward, those sites located within and around Hadlow are the most sustainable against the SA objectives, in comparison to others that are located away from Hadlow village.</p> <p>3.81 The settlement has a wide range of services and facilities, access to public transport and has limited designations, other than Green</p>	<p>Question 8 of the consultation was "Do you agree with the findings of the individual site assessments in Annex 1 of the Interim Sustainability Appraisal? Yes/No Please explain and quote the individual site reference number".</p> <p>Table 16 in the Non-Technical Summary presents the findings of the residential site options. This table is also presented in the Interim SA Report, in Table 5.1.</p> <p>Annex 1 of the Interim SA Report provides a proforma for each site appraised in the SA, whilst Appendix D of the Interim SA Report presents the site assessment criteria.</p> <p>Support noted.</p> <p>The SA is one of many factors that feed into the plan-making process. It does not specifically identify which sites should come forward through allocations in the Local Plan but provides an objective assessment of their sustainability.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Belt, therefore can promote sustainable development, in line with NPPF, Para. 11.</p> <p>2) Court Lane Nurseries is the most sustainable site with Hadlow</p> <p>3.82 12 sites have been identified and assessed as part of the SA at Hadlow.</p> <p>3.83 We conclude that it is clear that the site at Court Lane Nurseries (Site ID 59853 / 59857) scores the highest against all SA objectives. We consider this assessment of the sites to be accurate.</p> <p>Most significantly, as identified by the Council, what sets Site ID 59853 / 59857 above all of the other sites is that it is brownfield land. As a result, the SA assessment scores the site as having a "significant positive effect likely" against SA Objective 9, which states "the site is located on brownfield land", as well as SA Objectives 3 and 4, which relate to accessibility to schools and economic growth. Overall, the site scores the most "positive effects" out of all the sites assessed in Hadlow.</p> <p>3.85 We support the findings of this assessment which in accordance with the NPPF mean that the site should come forward for future development / achieve site allocation in the new Local Plan. This point is further explored below.</p> <p>3) Court Lane Nurseries is brownfield land</p> <p>3.86 The site at Court Lane Nurseries (Site ID 59853 / 59857) is the only site at Hadlow that is identified as being brownfield land.</p> <p>3.87 Against SA Objective 9, the site scores as having a significant positive effect. All other sites within Hadlow are considered to be greenfield and containing a proportion of Grade 1 or 2 agricultural land therefore scoring as having a "significant negative effect likely".</p> <p>3.88 We agree and support this assessment given the site contains a number of large buildings and glasshouses, most of which are now vacant and at risk of becoming derelict and possibly vandalised. The site also contains significant hardstanding, including a concrete vehicular access and a large area of the site being covered in gravel to facilitate overflow parking facilities for College students.</p> <p>3.89 In line with Para.119 of the NPPF, strategic policies should promote an effective use of land and should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.</p> <p>3.90 Therefore, we recommend that Court Lane Nurseries, Hadlow should be considered in the first instance for an allocation within the new Local Plan."</p>	
44403137	Q8 of the questionnaire	<p>"In respect of this question, our client only wishes to comment upon their site [Site 59720]. In this regard, we support the double positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p>	<p>Site 59720 receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains existing green infrastructure assets, specifically trees and thick vegetation in the north of the site and around its edges. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p> <p>Flooding has been a concern to the local residents of Ightham and flood incidents along the Busty Stream have occurred, the most severe of which took place in 2016. This site falls outside of the area impacted by past flood events.</p> <p>In short, the desktop nature of the site assessment is of concern. Based on a human judgement there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive. It is therefore essential that sites are properly appraised to ensure that decisions are made on credible information."</p>	<p>a wide variety of features which may vary in their value". Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>The SA acknowledges that the site is largely with Flood Zone 1 (less than 1 in 1,000 annual probability of river flooding), is not at risk of surface water flooding and does not contain a water body or watercourse, but that it does fall within Source Protection Zone 3. For this reason, it receives a mixed uncertain minor negative and negligible effect in relation to SA objective 8: water.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>
44406689	Q8 of the questionnaire	<p>"Site reference 59797 and site reference 59800:</p> <p>Development on any of the golf course would result in the loss of golf course and loss of businesses that operate it (which provides employment for local residents). Impact of Wildlife as Golf Course is designated by the Environment Agency as a Local Wildlife Site as part of the nature conservation sites in their screening report for Nature and Heritage Conservation in 2019. Area is part of Green Belt. Harm to the aquifer for streams. Development risks impacting designated Historic Woodland adjacent to site. Loss of recreation facilities for golfers, and public footpaths used by walkers, dog walkers, and cyclists would adversely impact health and well-being of local residents in contradiction to SA Objective 1. Road Infrastructure cannot support current traffic demands with bottlenecks regularly occurring on A228 and no easy options to address. Medical Facilities and Schools cannot support existing demand. Approval for Kings Hill development was granted based upon 40% of the area remaining green space with the golf course an agreed amenity"</p>	<p>The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. The promoter of this site has not declared that it contains an existing business.</p> <p>Although not explicitly stated in the proforma, the SA does acknowledge the fact sites 59797 and 59800 overlap a Local Wildlife Site (Kings Hill Golf Course, Cattering & Hoath Woods). In the next iteration of the SA Report, the proformas for both sites will be updated to each state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites, or Ancient Woodland, or contains a locally designated site."</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Both sites receive significant negative effects in relation to SA objective 7: heritage, as they are within 250m of heritage assets as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain as they depend on the design of new development and whether there are sight lines between the development site and nearby heritage assets.</p> <p>The SA acknowledges that development of these sites will result in a loss of open space and therefore both sites receive an uncertain</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>significant negative effect (as part of a mixed effect) against SA objective 1: health and wellbeing.</p> <p>The SA is too high-level to consider specific road networks and their capacity, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1: health and wellbeing do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>The SA also does not take into consideration the capacity of schools. With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>
44412897	Q8 of the questionnaire	<p>"No. Again, the SA is based on unevidenced assumptions partly due to the fact that TMBC have elected to proceed with this Regulation 18 consultation and accompanying SA in advance of the publication of the SHLAA. In respect of the site south west of Teston Road, Kings Hill (ref 59655), we wish to make the following comments:</p> <p>SA Objective 2</p> <p>With regard to the site's accessibility (SA Objective 2) we question the conclusion that the site falls within the Fair Accessibility Band. It is not at all clear how this conclusion has been arrived at. Paragraph 5.6 states that each site's overall accessibility score has been determined by applying a scoring matrix to each element of accessibility, however this matrix does not appear to have been published. It is therefore impossible to be able to review and confirm whether the scoring is fair or indeed whether it has been informed by accurate factual information or not. In respect of the site's accessibility, it should be noted that it is a short 340m walk from the Discovery School (Primary School) within Kings Hill, whilst there are various sports facilities and allotments in the immediate vicinity, with the centre of Kings Hill also nearby.</p> <p>SA Objective 5</p>	<p>As stated in paragraph 2.27 of the Interim SA Report, "Reasonable alternative options for the residential, employment and mixed use sites to be allocated in the Local Plan have been identified by TMBC. These sites were identified via a call-for sites exercise and an Urban Capacity Study. In addition, allocations from the withdrawn Local Plan which were not submitted during the call-for-sites exercise and were not identified in the Urban Capacity Study have been identified in the pool of reasonable alternative options."</p> <p>Site 59655 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band. The Urban Capacity Study can be found online here: https://www.tmbc.gov.uk/downloads/download/446/local-plan-regulation-18-consultation-evidence-base. The SA acknowledges that the site is within close proximity of The Discovery School under SA objective 3: education, and that it is also within close proximity of open space including allotments under SA objective 1: health and wellbeing.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. provision of a buffer). This ensures all sites are appraised to a consistent level of detail. If the site were to be allocated via policy in the Local Plan containing mitigation measures then it would be appraised on a 'policy-on' basis. The site contains green infrastructure assets in the form of trees and thick vegetation on its northern and</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The SA states that:</p> <p>"The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites."</p> <p>And</p> <p>"The site contains an existing green infrastructure asset that could be lost as a result of new development"</p> <p>The site adjoins ancient woodland to the south and to the east. The site's boundary extends slightly into the ancient woodland to the south. Nevertheless, Bellway have significant experience of developing near to ancient woodland. A buffer will be provided, and the site's structural landscaping will be undisturbed by the development.</p> <p>Other than the trees, predominantly on the boundaries plus a single belt of vegetation within the site, the farmed land is currently of little or no ecological value. A development would need to achieve biodiversity net gain and therefore the provision of housing would result in betterment and this should represent a strong positive.</p> <p>SA Objective 6</p> <p>The SA grades the site as "Uncertain minor negative" in respect of SA Objective 6 which is to protect and enhance the borough's landscape and townscape character and quality. It is stated that these effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scape and layout of the development, which may help mitigate any adverse effects.</p> <p>Bellway have commissioned evidence in respect of landscape and visual impact, to help inform TMBC's Sustainability Appraisal and Local Plan evidence base. A Landscape & Visual Appraisal with Green Belt Review, prepared by Barton Willmore now Stantec (BWnS) can be found at Appendix 1 to these representations. This considers the site to be of Low Sensitivity and Low Landscape Value for the following reasons:</p> <p>Whilst the adjoining woodland is clearly characteristic of the Mereworth Woodlands LCA, the Site itself is not, with no evidence of ecological, geological, geomorphological, or physiographic interest that contribute positively to the landscape;</p>	<p>southern boundary, and through the east of the site. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p> <p>With regard to SA objective 6: landscape and townscape, consideration is not given to supporting documents submitted by site promoters. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 7: heritage, the SA correctly acknowledges the fact site 59655 is within 250m of a heritage asset, as recorded in the Kent Historic Environment Record. Specifically, it contains a Second World War anti-tank buoy, and is adjacent to a Farmstead. There are additional heritage assets within 250m of the site.</p> <p>With regard to SA objective 9: soil, as the site is greenfield and contains Grade 2 agricultural land to its north, it receives a significant negative effect in relation to this objective.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The Site does not form part of the historic landscape setting to a noted heritage asset, or show evidence of archaeological, historical, or cultural interest that would contribute positively to the landscape;</p> <p>The landscape condition of the Site is unremarkable, with the internal field boundary of sweet chestnut offering the only landscape feature of interest;</p> <p>The Site is not thought to be connected with notable people, events, or the arts;</p> <p>The character of the Site does not demonstrate a strong identity or sense of place;</p> <p>The Site does not currently afford the opportunity for public recreation;</p> <p>The Site is generally not of noteworthy scenic beauty, insofar that it comprises a series of equestrian paddocks and a large area of hardstanding, contained by woodland;</p> <p>The Site does not benefit from a perception of relative wildness or naturalness, but the strength of the woodland enclosure does offer a sense of tranquillity within the Site despite the proximity to Kings Hill;</p> <p>The Site demonstrably functions as an equestrian facility; and</p> <p>The Site is not covered by any landscape designations.</p> <p>The site has a very localised visual envelope due to the enclosure and containment provided by the existing boundary vegetation. As the site sits on relatively high ground, it does not allow for overlooking from distant views.</p> <p>Given the availability of this new landscape evidence, the site should be considered to provide the opportunity for residential development from a landscape and visual perspective. The site's grading in respect of SA Objective 6 should be revised to neutral.</p> <p>SA Objective 7</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>According to Historic England's online map search, the nearest designated heritage asset is a Scheduled Ancient Monument some 450 to the north west of the site. The statement that the site is located within 250m of a heritage asset appears to be inaccurate, particularly given the absence of any evidence. The site's grading should be revised from 'uncertain significant negative' to neutral.</p> <p>SA Objective 9</p> <p>According to Natural England's Land Classification Map of London and the South East, the site falls within an area categorised as "Other land primarily in non-agricultural use", and therefore is not given an agricultural land classification. This is a fair reflection of the site's equestrian use. An extract of the Natural England map is provided below. The site's grading should therefore be revised from 'significant negative' to neutral."</p>	
44416033	Q8 of the questionnaire	<p>"No. Again, the SA is based on unevidenced assumptions partly due to the fact that TMBC have elected to proceed with this Regulation 18 consultation and accompanying SA in advance of the publication of the SHLAA. In respect of the Land South of Station Approach, West Malling (ID 59860), we make the following comments:</p> <p>The Site Area</p> <p>The area assessed, should include the in the north-western corner, currently occupied by a tennis court and positioned between Lavenders Road and Swan Street. This formed part of the application discussed further below. This area will not form part of the development area, but will usefully secure, an area of ecology and landscaping and critically secure an offset from the adjacent heritage assets (the Abbey).</p> <p>SA Objective 5</p> <p>As the Council is aware, the Site being was subject to an Outline application in 2018 (ref 18/02093/OA). The application was accompanied by an Ecological Appraisal. The condition and management of the Site has not changed since that time.</p> <p>The assessment confirms that the habitats within the Site are common and widespread and are generally of value at Site level only. Hedgerows and trees are considered to be of somewhat elevated value within the context of the Site at the local level. Proposals can</p>	<p>The SA is high-level and does not give consideration to previous planning applications for sites, and giving consideration to supporting documents would result in not all sites being appraised on a consistent basis.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59860 was incorrectly recorded as containing a green infrastructure asset. The reason the site is recorded as containing a green infrastructure asset is that it slightly overlaps a green infrastructure asset (trees and thick vegetation to the north west of the site) and so the GIS analysis identified the site as containing a green infrastructure asset. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective, as it is within 1km of Ancient Woodland.</p> <p>With regard to SA objective 6: landscape and townscape, the proforma for the site states that it is not located near any settlements in rural locations <i>and/or</i> would result in the loss of designated open space. The SA does not state that the site would result in the loss of open space as if it did, it would receive an uncertain significant negative effect in relation to SA objective 1: health and wellbeing. The site receives an uncertain significant negative effect in relation to SA objective 6, as it is not located near any settlements in a rural location and could therefore have an adverse effect on the landscape.</p> <p>With regard to SA objective 7: heritage, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. reduction of the development area). If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>retain those features identified to be of value, with all the hedgerows and the vast majority of trees retained. New habitats can also be created to offset losses, in conjunction with landscape proposals.</p> <p>1.2.37 The above assessment was based on a larger development and the proposed smaller development area (with development now not proposed in the north-western part of the Site), would have a further reduced impact. The Council's assessment of "Uncertain significant negative (--?) " therefore must be changed to "neutral".</p> <p>SA Objective 6</p> <p>The Site is not within a designated open space and therefore will not result in its loss. Furthermore, it lies adjacent to the "Rural Service Centre", West Malling. The Site is also not subject to any landscape designations and is not within an area identified as a "valued landscape". The Council's assessment of "Uncertain significant negative effect (--?) " is therefore unjustified.</p> <p>Following the aforementioned application, the area of development is proposed to be reduced. The proposed development will still result in change to the landscape, as is the case with any development on a greenfield site. However, these impacts will be minimised and suitable mitigation can be put in place, through high quality development and landscaping, which can further minimise any impacts. The assessment must therefore be amended to "negligible (0)".</p> <p>SA Objective 7</p> <p>Following the Outline application and subsequent Appeal (ref APP/H2265/W/19/3227034), it is proposed that the development area is reduced to facilitate a development that provides greater separation from the designated heritage assets as well as facilitate a form and arrangement of development that is more in keeping with the identified rural character, which forms the setting to the heritage assets. The Council's assessment of impacts must therefore be amended to "negligible (0)".</p> <p>SA Objective 8</p> <p>As demonstrated as part of the Outline application and supporting Flood Risk Assessment, the Site is located within Flood Zone 1 and the development of the Site would not lead to an increase of flooding on or off the Site. In addition, the majority of the Site is at low risk of</p>	<p>With regard to SA objective 8: water, the site receives a significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>The SA correctly identifies the site as containing Grade 1 agricultural land, under SA objective 9: soil. As more than 25% of the site comprises Grade 1 agricultural land and SA utilises a precautionary approach, a significant negative effect is correctly recorded in relation to SA objective 9.</p> <p>With regard to SA objective 13: material assets and waste, the SA specifically states in the proforma for the site "The effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed."</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>surface water flooding, with a very small area of "low risk" flooding on the northern boundary of the Site.</p> <p>The Council's assessment of "Significant negative (-)/Negligible (0)", must therefore be amended to "Negligible (0)"</p> <p>SA Objective 9</p> <p>In respect of the abovementioned Appeal, the Inspector determined that:</p> <p>"So in common sense terms even as BMVAL the appeal site presents an isolated pocket of agricultural land which in the economy of scale and the constraints of the land, at worst, its loss would be modest. Therefore, the development of the grade 1 and 3a agricultural land in real terms would not adversely impact on the economic and other benefits of BMVAL and the primary purpose of food production. Therefore, the aims of the Framework in this regard, would not be undermined by the proposed development" (para 22)</p> <p>The Council's assessment fails to take into account the above, or the contribution the Site would actually make to food production when weighing the impact the development would have on the availability of BMVAL. In light of the above, the assessment must be amended to "Negligible (O)".</p> <p>Objective 13</p> <p>Whilst the Site is within a Minerals Safeguarding Area, the Council's assessment fails to consider:</p> <p>a) The size of the Site and whether it is of a size that mineral extraction would be viable; and</p> <p>b) The context of the Site, including the proximity of residential development and Abbey (a heritage asset), which would likely preclude extraction because of the impact on amenity.</p> <p>In light of the above, the Council's assessment must be amended to "Negligible (O)", since it is clear that the Site is unlikely to have a detrimental impact on the availability of minerals."</p>	
44426049	Q8 of the questionnaire	<p>"In respect of this question, our client only wishes to comment upon the site they are promoting [59613]. In this regard, we support the 'significant positive' that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives and attributes only minor positives and</p>	<p>Site 59613 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of open space and a walking path, but is not within 800m of a GP surgery. This is in accordance with the site assessment criteria outlined in Appendix D of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>a minor negative in relation to the accessibility of the site to amenities (SA Objectives 1-3). Given the location of the site, within convenient active travel distance to grocery stores, primary school, pharmacy, open space, a range of independent business and regular bus services with East Peckham, we consider that the benefits of development at the site would yield greater sustainability benefits than the SA suggests, particularly in the context of the rural nature of the borough where sustainable opportunities outside of the principal settlement of Tonbridge and inherently more limited. Development would also contribute positively to the viability and vitality of the facilities and community and can contribute to the provision of additional infrastructure. This does not appear to have been considered within the appraisal.</p> <p>We note also that East Peckham was identified previously by the Council as a suitable and reliable location for growth within the failed Local Plan. In our view, East Peckham should continue to be identified as suitable for development and the release of this site from the green belt would contribute to meeting the Council's housing requirement which has increased further still since the previous Plan preparation.</p> <p>In addition, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p> <p>The desktop nature of the site assessment is also of concern. Based on a human judgement there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>In short, it is essential that sites are properly appraised to ensure that decisions are made on credible information."</p>	<p>The site receives a minor negative effect in relation to SA objective 2: services and facilities, as the site is placed in the Fair Accessibility Band within the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria.</p> <p>The site receives an uncertain minor positive effect in relation to SA objective 3: education, as it is within 800m of a primary school (East Peckham Primary School). All effects against this objective are recorded as uncertain for the reason outlined in the site assessment criteria, specifically "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on their being capacity at those schools to accommodate new pupils" [emphasis added].</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>
44417409	Q8 of the questionnaire	<p>"No we do not agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report. In fact we have serious concerns about the accuracy and robustness of the findings of the SA when it comes to a number of sites in and around Hadlow. Starting with the land east of Carpenters Lane/ north of The Paddock, Hadlow, site reference 59776 we would advise as follows:</p> <p>JAA table 5 – Overview of the SA scoring of site 59776</p> <p>[See SA Annex 1 for table and revised scoring and additional comments on sites 59776, 59601, 59859, 59806, 59846, and 59811.]"</p>	<p>Paragraph 3.55 in the Interim SA Report identifies one of eleven key sustainability issues facing Tonbridge and Malling Borough. These key sustainability issues (identified using the baseline information) have been used to develop a set of SA objectives, which provide a framework against which the effects of the Local Plan will be assessed.</p> <p>The site assessment criteria outlined in Appendix D of the Interim SA Report are developed using the SA objectives, and are also reliant on what information the local planning authority has available. The SA is a desk-based strategic assessment and it would not be possible of proportionate for the SA to explore tranquillity.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>With regard to SA objective 1: health and wellbeing, justification text was not provided due to an error. In the next iteration of the SA Report, justification for the effect against SA objective 1 will be provided. The site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a significant positive effect only in relation to SA1.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. open space provision). This ensures all sites are appraised on a consistent basis. If the site were to be allocated via Local Plan policy containing mitigation measures, it would be appraised on a 'policy-on' basis.</p> <p>The appraisal against SA objective 2: health and wellbeing has been informed by the Urban Capacity Study (July 2022). As the site falls within the Fair Accessibility Band, it receives a minor negative effect in relation to this objective. This is in accordance with the site assessment criteria. SA objective 2 does not cover homelessness and so the sub-objective "To tackle homelessness more effectively" will be moved to underneath SA objective 14: housing. Although, it is noted above that the sub-objectives are used when appraising policies, not sites. Access to public transport is considered separately under SA objective 10: climate change mitigation.</p> <p>Site 59776 is incorrectly recorded as containing green infrastructure assets, as it overlaps some green infrastructure assets in its vicinity. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect, as it is within 1km of an area of Ancient Woodland. All negative effects against SA objective 5 are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>SA objective 6: landscape and townscape looks at the effect development of each reasonable alternative development site option may have on the landscape and townscape. The fact site 59776 is a paddock does not relate to the effect its development might have on the landscape.</p> <p>Site 59776 is, however, incorrectly recorded as having a significant negative effect in relation to this objective. In the next iteration of the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>SA, the effect will be upgraded to a minor negative effect, as the site is located on the edge of the settlement of Hadlow.</p> <p>All negative effects against SA objective 6: landscape and townscape are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>Whether a site comprises brownfield or greenfield land is considered separately under SA objective 9: soils.</p> <p>Site 59776 receives an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets. This is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, the proforma for site 59776 states that it is entirely or significantly within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site contains land with a 1 in 30 year risk of surface water flooding in its south eastern corner and so the significant negative effect against this objective is correct. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation. If the site were to be allocated via Local Plan policy containing mitigation measures, it would be appraised on a 'policy-on' basis.</p> <p>With regard to SA objective 10: climate change mitigation, a distance of 400m was considered appropriate walking distance to a bus stop. The site is not within close proximity of a railway station. Therefore, the site correctly receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 13: material assets and waste, it is acknowledged in the SA that although the site is within a Minerals Safeguarding Area, the effect is uncertain and it will depend on factors such as whether sites would in fact offer viable opportunities for minerals extraction.</p> <p>With regard to SA objectives 3: education, 4: economic growth, 9: soil, 11: climate change adaptation, 12: air quality and 14: housing, respondent has not expressed any disagreement over the effects given for site 59776.</p> <p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. If a site is not consistent with the spatial strategy, it may still be considered a reasonable alternative.</p> <p>Site 59846 has been appraised in line with the site assessment criteria and therefore receives a minor positive effect in relation to SA objective 1: health and wellbeing. The SA is too high-level to give consideration to barriers to pedestrian movement.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>Site 59846 does not contain Ancient Woodland but is within close proximity of Ancient Woodland. It correctly receives an uncertain significant negative effect as it contains green infrastructure assets, in addition to falling within is within 250m of areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). The presence of waterbodies is dealt with separately under SA objective 8: water. The SA correctly acknowledges site 59846 as containing water bodies.</p> <p>Site 59811 contains Ancient Woodland, in addition to green infrastructure assets. Therefore, it correctly receives an uncertain significant negative effect in relation to SA objective 5. The SA correctly acknowledges site 59811 as containing water bodies under SA objective 8.</p> <p>SA objective 6: landscape and townscape does not give consideration to green infrastructure and vegetation cover, which is instead considered under SA objective 5: biodiversity and geodiversity. As mentioned already, the assessment of site 59776 will be corrected to reflect the fact it is located on the edge of a settlement.</p> <p>All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development. Furthermore, this is a 'policy-off' appraisal and so consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail.</p> <p>The sequential test is a separate assessment process to the SA and will be used at a later stage in the plan-making process to help inform the SA. All sites have been correctly appraised against SA objective 8: water, in line with the site assessment criteria.</p>
44460673	Q8 of the questionnaire	<p>"3.8 We have some concerns with the individual site assessments in relation to our client's site.</p> <p>The site was submitted to TMBC's Call for Sites consultation that took place in January 2022 (ref. 59681). The site has been reviewed by TMBC in accordance with the key objectives surrounding Suitability, Availability and Deliverability as set out within the Sustainability Appraisal.</p> <p>Response to Specific Questions</p> <p>3.9 We have set out the objectives below and our commentary on the individual objectives, as supported by the technical assessments which have been produced for the Planning</p> <p>Application which is due to be submitted to TMBC shortly.</p> <p>SA Object ive 1: To improve human health and well-being</p> <p>Minor positive (+)</p>	<p>It is not the role of the SA to explore the suitability, availability and achievability/deliverability of sites, this is role of other pieces of evidence to inform plan preparation. The purpose of SA is to assess all reasonable alternative development site options, to help the Council determine which sites to allocate and not allocate. The SA is one of many factors that feed into the plan-making process.</p> <p>The site receives a significant negative effect in relation to SA objective 2: services and facilities, as it falls within the Poor Accessibility Band in the Urban Capacity Study (July 2022). The SA states in the site assessment criteria in Appendix D that "The location of employment sites to community facilities and services is relevant as people may make use of the facilities and services near to their workplaces around working hours.</p> <p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. Site</p>

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		<p>The site is within 800m of an existing area of open space/sports facility or walking/ cycle path.</p> <p>3.10 We agree with this observation.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band.</p> <p>3.11 Whilst we recognise that the site is located outside of the settlement boundary of Wrotham, due to its employment use, accessibility to community facilities and services is not necessarily a key consideration compared to housing development, for example. Therefore, we consider that the assessment does not affect the sites continued development potential for employment use. The score should be neutral.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>N/A</p> <p>The location of employment sites is not considered likely to affect this objective.</p> <p>3.12 We agree with this observation.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Minor positive (+)/Negligible (0)</p> <p>The site includes employment development smaller than 5ha in size. The site is not within 800m of a train station or within 400m of a bus stop or cycle path.</p> <p>3.13 We consider that the assessment rating should be 'significant positive'. The development proposals at the site will generate significant economic benefits including employment opportunities during the construction and operational phases of development, with 70 direct on-site employment opportunities with a total net employment of 92 jobs provided at the operational phase. Operations on site will also support approximately 180 drivers, operating</p> <p>Response to Specific Questions as part of Owner Driver Franchisees. The development proposals have the potential to generate £4.1m GVA national from direct and indirect jobs. Support towards local employment and skills and training opportunities. It is not often that brownfield employment sites are located as well as this Site in terms of access to the Strategic Road Network. The Site has excellent connectivity to the Strategic Road Network with the A20 London Road providing direct access to the M26 Junction 2a to the south-east and M20 Junction 2 to the north-west.</p> <p>The M20 accommodates long distance journeys to Maidstone, Ashford, and Folkestone to the south-east and towards the M25</p>	<p>59681 is still expected to have a positive effect in relation to this objective, albeit minor. Although different types of employment development may have different locational requirements, the SA is high-level and so does not look into the different types of employment that may be provided, particularly as this cannot be guaranteed.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain or a landscape strategy). This ensures all sites are appraised to a consistent level of detail.</p> <p>With regard to SA objective 6: landscape and townscape, again this is a 'policy-off' appraisal and consideration is not given to additional information provided by site promoters, so as to ensure all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Junction 3 to the north-west. The M26 provides a link between the M25 Junction 5 and the M20 Junction 3. Due to this level of connectivity the site is particularly well suited to Class B8 storage and distribution uses.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>Uncertain significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The site contains an existing green infrastructure asset that could be lost as a result of new development. The effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>3.14 We do not agree with this assessment although note that it is dependent on detailed development proposals coming forward. The development proposals have considered the provision of 10% Biodiversity Net Gain, including both on-site and off-site measures to align with measures within the Environment Bill. In terms of on-site measures, it is considered that a landscape strategy could be progressed at the site that reinforces boundary planting and vegetation, providing species rich habitats. In addition, how biodiversity enhancement measures can be implemented as part of development proposals to support wildlife habitats, as identified within the submitted Ecological Mitigation Strategy.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality</p> <p>Uncertain significant negative (--)</p> <p>The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is within 500m of the AONBs. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Response to Specific Questions</p> <p>3.15 We do not agree with this assessment although note that it is dependent on detailed development proposals coming forward. Through the preparation of the emerging proposal for the redevelopment of the Site, the visual effects of the proposed development have been found to be predominantly localised to within the setting of the site, with the potential for a comprehensive Landscape scheme to assist in"</p>	
44471521	Q8 of the questionnaire	"The Site has been assessed through the Interim Sustainability Appraisal (site reference: 59773) and there are some parts of the	Site 59773 has been appraised in line with the site assessment criteria as outlined in Appendix D of the Interim SA Report. In accordance

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>appraisal that we agree and support, whilst others we consider incorrect. Our comments on the relevant objectives (that we do not agree with) are outlined below.</p> <p>We therefore consider the Interim Sustainability Assessment Report scores for the objectives as listed above should be higher than set out within the assessment. We therefore request that the interim sustainability Appraisal for the Site is reviewed by the Council and amended in accordance with the above."</p>	<p>with the site assessment criteria, the site receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of open space and walking paths. Housing delivery is considered separately under SA objective 14: housing.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022). Housing delivery is dealt with separately under SA objective 14: housing. This is a 'policy-off' appraisal and so consideration is not given to mitigation, such as financial contributions towards community facilities and public transport.</p> <p>With regard to SA objective 3: education, again this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. contributions towards education provision). This ensures all sites are appraised on a consistent basis. All effects against this objective are recorded as uncertain due to uncertainty regarding school capacity.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Although it is noted that an SME would undertake the construction work, this is an appraisal of the site and does not take into consideration who is developing the site.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape and 7: heritage, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain and landscaping). If the site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-off' basis.</p>
44459553	Q8 of the questionnaire	<p>"In relation to site references [59637], [59638] and [59686] – No. The ISA has been undertaken in insufficient detail and has not considered measures to offset impacts. Specific comments are made in relation to ISA objectives 5 (bio and geodiversity), 6 (land and townscapes), and 8 (water).</p> <p>In relation to site reference [59615] – No. The ISA has been undertaken in insufficient detail and has not considered measures to offset impacts. Specific comments are made in relation to ISA objectives 5 (bio and geodiversity), 6 (land and townscapes), 7 (cultural heritage) and 8 (water)."</p>	<p>It is correct that the Interim SA Report has not considered measures to offset impacts, as this ensures all sites are initially appraised on a consistent basis (i.e. 'policy-off'). If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>
42821345	Q8 of the questionnaire	<p>"Site [59830] - [INCLUDES A SUSTAINABILITY APPRAISAL REVIEW NOTE]</p> <p>The Sustainability Appraisal Review note at Appendix B provides a site-specific appraisal of Borough Green Gardens against the Sustainability Appraisal objectives based on technical and design work previously completed for the Site.</p>	<p>Annex D of the Interim SA Report contains 'policy-off' appraisals of sites that do not take into consideration mitigation. This ensures all sites are initially appraised on a consistent basis. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>As detailed in the note, TMBC's assessment of the Site within Annex 1 of the Interim Sustainability Appraisal did not include consideration for committed mitigation measures and controls which have been embedded within the design of the development to reduce adverse effects and enhance beneficial effects.</p> <p>Through the consideration of this it is possible to conclude development of the Site has potential to lead to, predominately, significantly positive effects, including in respect of objectives to improve human health and wellbeing, improve levels of education attainment, encouraging sustainable economic growth, reducing greenhouse gas emissions, to protect and improve air quality and to provide a suitable supply of housing. Where negative effects are identified, these are minor and likely to be experienced by alternative allocation options."</p>	
44819617	Q8 of the questionnaire	Site [59822] - [INCLUDES AN INTERIM SUSTAINABILITY APPRAISAL REVIEW - COPY OF REPRESENTATION IN "COPIES FOR LUC" FOLDER]	<p>With regard to the SA framework, the respondent has referred to the sub-objective "To promote the use of more sustainable modes of transport" as incorrectly being located under SA objective 11: climate change adaptation when it should be under SA objective 10: climate change mitigation. However, it is under SA objective 10 in the Interim SA Report.</p> <p>The respondent has requested a map showing the proposed strategic options and reasonable alternative development site options. Consideration will be given to including a map in the next iteration of the SA if appropriate, and depending on the content of the next version of the Plan.</p> <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible to explore the cumulative effects of the Plan at this stage.</p> <p>There is a lot of crossover between the SA objectives but this is not something the SA is required to explore. The SA objectives (i.e. the SA framework) were established via the review of plans, policies and programmes (Appendix B) and the key sustainability issues (paragraphs 3.52 to 3.92) identified by the baseline review (Appendix C).</p> <p>The SA has provided an appraisal of all reasonable alternative options and will continue to do so.</p> <p>The respondent has provided a detailed table regarding the SA's compliance.</p> <ul style="list-style-type: none"> ■ It is not necessary for the SA to provide an infographic or table showing the timeline and key dates specific to the stages of the Local Plan and SA, rather it is the role of the Local Development Scheme to provide this information. ■ The quality of Figure 3.1 will be improved.

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			<ul style="list-style-type: none"> ■ It would not be appropriate or proportionate to provide even further detail on existing policies, sustainability issues and mitigation within surrounding and neighbouring local authorities. Appendix B of the Interim SA Report provides enough detail on this currently. ■ However, you can view how we have addressed each comment on the SA Scoping Report in Appendix A of the Interim SA Report. It is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ With regard to the changing policy context, this is addressed under paragraphs 1.11 and 3.4 of the Interim SA Report. As there is a lot of uncertainty over these changes, further detail is not available. ■ It is not within the scope of the SA to explain how all international, national and sub-national plans and agendas will work holistically to achieve sustainable growth. ■ With regard to the baseline information, it is not usual practice to show what has changed in each iteration of the SA, as there are often many changes throughout the plan-making process. ■ In Chapter 3 of the Interim SA Report the heading 'Likely Evolution of the Issue without the Local Plan' is used throughout, under each key sustainability issue identified. In line with the SEA Regulations, the SA correctly explores what will happen without the Local Plan. Further detail will be added to the sentence regarding the historic environment, in addition to references to vehicle technologies where relevant. ■ 'Do nothing' options result in negligible effects against all SA objectives, as they do not change the existing baseline. ■ A sub-objective regarding net zero has been added under SA objective 10: climate change mitigation. SA objective 10 explores climate change mitigation whereas SA objective 11 explores climate change adaptation. Climate change mitigation relates to the reduction of CO2 emissions whereas climate change adaptation relates to adapting to the effects of climate change (e.g. extreme weather events). ■ LUC was commissioned to undertake SA of the Local Plan, not HRA. The HRA is a separate, standalone document to the SA that will inform the SA at later stages in the plan-making process. ■ As mentioned already, the Interim SA Report does not contain a cumulative effects section due to the high-level nature of the Regulation 18 Local Plan. ■ The reasonable alternative development site options were appraised using the site assessment criteria outlined in Appendix D of the Interim SA Report, not the SA objectives and sub-objectives, which the policies and appraised against.

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			<ul style="list-style-type: none"> ■ In the next iteration of the SA, consideration will be given to short, medium and long-term effects, and permanent and temporary effects. This will be in the cumulative effects section which as explained already, was not provided in the Interim SA Report as there were no policies and allocations to clearly identify the overall effects of the Plan, just options. ■ The site appraisals are 'policy-off' not 'policy-on', as consideration has not yet been given to mitigation. This ensures all sites are initially appraised on a consistent basis. If a site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis. <p>The Interim SA Report does not contain an appraisal of cumulative effects due to the high-level nature of the Regulation 18 Local Plan. As TMBC were consulting on issues and options, not policies and allocations, it would not have been possible explore the cumulative effects of the Plan.</p> <p>It is important to note that the SA is one of many factors that feed into the plan-making process. The appraisals in Annex 1 of the Interim SA Report have been undertaken on a 'policy-off' basis, which means that the sites have been appraised on their physical constraints only. This ensures they are all appraised to a consistent level of detail. If sites are allocated in the Local Plan via policy that contains mitigation measures, the sites will be appraised on a 'policy-on' basis (i.e. taking into consideration mitigation).</p> <p>The respondent has provided their own appraisal of site 59822. As mentioned already, this is a 'policy-off' appraisal and so consideration is not given to mitigation at this stage.</p> <p>With regard to SA objective 1: health and wellbeing, Air Quality Management Areas (AQMA) are considered separately under SA objective 12: air quality.</p> <p>With regard to SA objective 2: services and facilities, the site receives a minor negative effect, as it falls within the Fair Accessibility Band in the Urban Capacity Study (July 2022). Therefore, it correctly receives a minor negative effect which is in accordance with the site assessment criteria outlined in Appendix D of the Interim SA Report.</p> <p>The minor positive effect against SA objective 3: education is recorded as uncertain because the actual effect will also depend on whether there is capacity at nearby schools to accommodate new pupils.</p> <p>With regard to SA objective 4: economic growth, the site receives a minor positive effect instead of a significant positive effect because it is smaller than 5ha. This is in accordance with the site assessment criteria, which distinguishes between smaller and larger employment and mixed-use sites.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59822 receives an uncertain significant negative effect as in addition to containing green infrastructure assets (thick trees and vegetation), it is within 250m of some areas of Ancient Woodland. In the next iteration of the SA Report, the proforma will clearly distinguish</p>

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			<p>between internationally and nationally designated sites, and Ancient Woodland (Ancient Woodland is currently covered under international and national biodiversity and geodiversity sites).</p> <p>With regard to SA objective 6: landscape and townscape, the site receives an uncertain significant negative effect as it is not located near any settlements in a rural location and so cannot be as easily integrated into existing development than if it were located inside of or on the edge of a settlement.</p> <p>With regard to SA objective 7: heritage, the SA does not utilise independent historic appraisals that have been undertaken and submitted by some site promoters, as this would mean that the sites are not appraised on a consistent basis. The site receives an uncertain significant negative effect as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>With regard to SA objective 8: water, the site receives a significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding. The site is also located in Source Protection 3 but this is not the reason for its significant negative effect. Again this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively used for agriculture. Contamination is different to the Agricultural Land Classification. It is correct that the site receives an uncertain significant negative effect in relation to this objective.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. The SA correctly identifies the site as falling within 400m of a bus stop but not 800m of a railway station.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, 59822 receives a negligible effect as it is not within 100m of an Air Quality Management Area (AQMA).</p> <p>With regard to SA objective 13: material assets and waste, the SA at this stage does not take into consideration mitigation and so even if the site will be extracted prior to development, the effect should remain as it is. This is because information like this may not be available for other sites and so they would not all be appraised on a consistent basis.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.
45325537	Q8 of the questionnaire	<p>"While we endorse that site ref. 59682 (Land South Of Church Lane) scores more favourably against other sites promoted for development at East Peckham, Snoll Hatch and Hale Street, we do not agree with the assessment of the Site at Appendix D of the SA for the reasons explained below.</p> <p>We consider that this Site has a greater potential to score more positively than the 'Minor Negative' scored with regard to SA2 'improving equality and access to community facilities and services'. This is because the site is sustainably located in proximity to the facilities and services available at East Peckham, which are all accessible via foot, cycle or bus. In addition, we would highlight that the Site is currently subject to a planning application (ref. 21/03353/FL) that includes a new community facility, designed specifically to provide accommodation for providers delivering health care for older people as well as preserving WWII heritage asses such as a Pillbox.</p> <p>With regards to SA5, we consider that the site has the potential to scope more positively than an 'uncertain minor negative' and certainly should not be scored any worse than a 'minor negative'. This is because while we acknowledge the SA does not take into account the potential for landscape mitigation, we would highlight the current planning application for the Site demonstrates how a scheme could be progressed that sensitively responds to its landscape context. This can be achieved via the sensitive placement of development, retention and incorporation of key landscaping feature and mitigation measures within the Site including native tree planning. This is evident from the Landscaping scheme submitted to support the planning application at Church Lane. The Landscaping scheme provides a landscape strategy comprising the retention of the existing hedgerows and trees that border the Site and those which currently divide the two parcels of land. The proposal will also add generous buffer zones to the edges of the Site. The Site will also provide good areas of public open space. The public open space will provide new landscaping such as wildflower and grass meadows.</p> <p>SA6 relates to the character and appearance of streetscapes of development in relation to existing settlements, particularly how new development should enhance or reflect the existing pattern of development. We consider that the Site has potential to score more positively than 'uncertain minor negative', and certainly should not be scored any worse than a 'minor negative'. This is because, the SA does</p>	<p>Site 59682 receives a minor negative effect in relation to SA objective 2: services and facilities, as it falls within the Fair Accessibility Band in the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria. The SA acknowledges under SA objective 10: climate change mitigation that although the site is more than 800m of a railway station, it is within 400m of a bus stop.</p> <p>Although the respondent notes that the site is subject to a planning application that includes a new community facility, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. provision of a community facility). The SA is too high-level to give consideration to individual planning applications for sites, and giving consideration to supporting documents would result in not all sites being appraised on a consistent basis.</p> <p>SA objective 5: biodiversity and geodiversity does not cover landscape, which is covered separately under SA objective 6: landscape and townscape. Site 59682 receives an uncertain minor negative effect in relation to SA objective 6 as it is located on the edge of a settlement and so there's potential for it to be more easily integrated into existing built development, compared to more rural and isolated sites. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. a landscaping scheme). All adverse effects against this objective are recorded as uncertain, as the actual effects are dependent on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The site receives a significant negative effect against SA objective 9: soil, as it is greenfield and comprises Grade 2 agricultural land. The SA looks at whether sites comprise best and most versatile agricultural land, not whether proposals would or would not represent significant development on best and most versatile agricultural land.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>not consider the potential for mitigation, the current planning application has demonstrated a way in which a development could be progressed at the site provide a range of typologies, building heights and streetscapes reflective of the mixed character of the settlements of Hale Street and East Peckham.</p> <p>SA9 relates to the conservation and enhancement of soil resources and the guarding against land contamination. SA9 scores the site as a 'Significant Negative'. We do not agree with how the Site has been assessed, as the Site has been incorrectly identified as Grade 1 agricultural land. However, the Agricultural Land Classification Report (Appendix C) submitted in support of the planning application at Land South of Church Lane identifies that all East Peckham and the surrounding land is covered by Grade 2-3 agricultural land. We believe the score for SA9 should be scored as a 'Minor Negative' in light of the above.</p> <p>In addition, at 3.2ha of BMV land, the proposals would not represent "significant development" of agricultural land in NPPF terms as the site falls well below the guideline figure of 20ha in order to constitute "significant development". Accordingly, the loss of the site would comply with the NPPF (para 174) in terms of the loss of BMV.</p> <p>SA10 relates to reducing greenhouse gas emissions to minimise climate change. The Site was scored a minor positive. We endorse this score given to the Site from TMBC.</p> <p>The Site was assessed as a 'Minor Positive' against SA14, which relates to providing a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures. The submitted planning application clearly shows that through the efficient use of the Site the land has capacity to deliver 69 residential units towards the 839dpa Standard Method target for the Borough if the allocation were to come forward. The Site is therefore, considered to be a medium size which could be delivered in the first few years of the Plan period. We consider that this would provide more than a minor positive benefit. Thus, the score should be upgraded to 'Positive'.</p> <p>Indeed, we would highlight that Site 59682 scored sufficiently highly in the SA for the previous draft Local Plan to support the proposed released of the Site from the Green Belt in that draft local plan and its allocation for residential development under draft Policy LP25 (t) and (v).</p> <p>With regard to Site 59782 we endorse TMBCs assessment in the interim SA."</p>	<p>SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
24925793	Q8 of the questionnaire	<p>"No. In our opinion, the scoring for some of the Objectives is questionable*, especially for sites in south-west Tonbridge. It also does not seem to reflect the potential negative impacts of the developments, given the infrastructure/highway capacity and air quality issues**, in our local area.</p> <p>Our initial abbreviated comments, for each of the locally listed development sites, are as follows.</p> <p>□ Sites 59550 & 59552 (Brindle's Field playground) – the loss of open space/recreational areas, which are locally valuable (so should be listed as Local Green Spaces – see Q.34), reduces access to recreational opportunities and local community facilities (like play areas). As such, the scoring should be negative for both SA1 and SA2 (not "--?/+", or "0"). Also, given the current lack of local primary school places* and the additional cumulative demand from other granted developments (inc. Site 59869: 125 houses), then SA3 should be slightly negative.</p> <p>□ Sites 59571 & 59572 (nr Milton Gardens) – the loss of open green spaces in residential areas again reduces access to recreational opportunities and so is detrimental to Objective SA1, which seeks to promote health/wellbeing. As such, SA1 should have a negative score (not "--?/+"). Again, given the current lack of local primary school places*, SA3 should be slightly negative. In addition, Site 59572 provides a buffer, minimising the landscape harm (SA6).</p> <p>□ Site 59641 (land adjoining Lower Haysden, on east side) – generally has the lowest Objective scores, than most other sites, so is least likely to deliver sustainable development and should not be taken forward. Furthermore, with reference to SA6 that rightly acknowledges the "significant negative impact", but the justification for this being "uncertain" (i.e. "--?") is questionable on balance. Firstly, as the justification text incorrectly states that "The site is not located near any settlements in rural locations", but this site adjoins the rural hamlet of Lower Haysden and so the scoring may have underestimated the impact.</p> <p>Secondly, having such a disproportionate amount of development, compared to existing hamlet, will cause significant harm (i.e. "--") to the character of this rural Conversation Area.</p> <p>Thirdly, such disproportionate development in this rural location is likely to cause significant harm to the landscape setting of the ANOB (<500m, as noted in L.P. Para. 5.21.92) and the surrounding countryside, regardless of it's design, especially given the flat open farmland.</p> <p>Lastly, this Green Belt site provides an important buffer to preserve the separate identity of Lower Haysden and prevent coalescence with the Tonbridge urban confines. As noted below (in Q.11, as stated by TMBC1) a minimum of 500m is required as an effective Green Belt buffer, but this loss green field buffer (at the western-edge) could be compounded by development within the eastern-half of this small</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>Sites 59550, 59552, 59571 and 59572 are recorded as having uncertain significant negative effects in relation to SA objective 1: health and wellbeing, due to the fact they contain an open space that could be lost as a result of development, although this is uncertain. The effects are coupled with a minor positive effects, as both sites are within 800m of other areas of open space, as well as walking paths.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Site 59572 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is within 500m of the AONB.</p> <p>All adverse effects against SA objective 6: landscape and townscape are recorded as uncertain, as the actual effects will also depend on the final design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Although the respondent has raised the point that sites 59641 is located on the edge of Lower Haysden, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct (it should receive a significant negative effect). In the next iteration of the SA, we will add this limitation to the section entitled 'Difficulties and Data Limitations'. Site 59641, in addition to site 59869 are not located within 500m of the AONB.</p> <p>Site 59695 is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. This is as a result of the percentage overlap between the site and settlement boundaries. In the next iteration of the SA Report, the effect will remain the same, as the site is located within 500m of the AONB. As mentioned already, all adverse effects against this objective are recorded as uncertain.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are</p>

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		<p>Green Belt buffer. For instance, if Site 59764 was taken forward, then Tonbridge would come within 200m of this site and Lower Haysden.</p> <p>□ Site 59695 (Lower Haysden Ln. south side, eastern land parcel) – as above, given the current lack of local primary school places*, SA3 should be negative; in view of the large number of new homes proposed, on top of the other granted developments (inc. Site 59869: 125 homes).</p> <p>This site will also have a “significant impact” on the landscape setting of the AONB, which overlooks this site, as acknowledged in the SA6 justification text. However, given the lack of natural screening along southern-boundary of the site, compared to the trees that screen the edge of the existing town confines, it is likely that any development here (regardless of it’s design, scale) would probably have a more certain detrimental landscape setting impact. Note to maintain an minimum effective Green Belt buffer of 500m (as per TMBC1), between Tonbridge and Lower Haysden, either this site or Site 59641 cannot be taken forward. □ Site 59764 (Lower Haysden Ln. south side, western land parcel) – as above, given the current lack of local primary school places*, SA3 should be negative; in view the even larger number of new homes proposed here, on top of the other granted developments (59869: 125 homes).</p> <p>Similarly, to Site 59695, this has a more certain “significant impact” on the landscape setting of the AONB, given the lack of natural screening. The scoring may also have underestimated the impact (i.e. “---”), given that the justification text incorrectly states that “The site is not located near any settlements in rural locations”, but this site is within 500m of rural Lower Haysden. Moreover, this site is located midway into the small Green Belt buffer that separates Tonbridge’s urban confines from the separate hamlet of Lower Haysden. As such, it would render this vital Green Belt buffer ineffective (<500m1), with the edge of the town extending to within 200m of Lower Haysden and would be contrary to its purpose to prevent coalescence.</p> <p>□ Site 59869 (Lower Haysden Ln. north side) – in the previous Draft Local Plan, this site had provision for a new primary school, which is needed, given the current lack of local primary school places*. However, the omission of new primary school at this site and increase in the proposed number of new houses (now 125), will put more pressure on local school places, together with the demand from other new housing sites (e.g. West [now North] Kent College).</p> <p>As such, development here without the proposed school should have SA3 negative score. On the basis that the site is over-looked by the AONB, which is 500m of the site, and given the potential “significant impact” on the landscape setting, robust policies need to be adopted for this site, to limit the visual impact; e.g. houses limited to 2-storeys, as noted below (see Q.19).</p> <p>(continues in comments)"</p>	<p>not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
45712961	Q8 of the questionnaire	PLEASE SEE SEPARATE PDF DOCUMENT ATTACHED TO EMAIL SUBMISSION: Objections to Local Plan Sites In & Around Kings Hill_Norma Watters ME19 4EG.pdf	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not within the scope of the SA to consider the capacity of rail services. The SA is too high-level to give consideration to the availability of car parking spaces, road width and congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic and air quality.</p> <p>With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA also does not take into consideration the capacity of schools. The site assessment criteria for SA objective 3: education in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA acknowledges that development of sites 59797 and 59800 would result in the loss of open space, under SA objective 1: health and wellbeing. The sites are expected to have mixed uncertain significant negative and minor positive effects in relation to this objective. The minor positive effects are due to the fact both sites are close to other areas of open space and walking paths.</p> <p>Although not explicitly stated in the proforma, the SA does acknowledge the fact sites 59797 overlaps a Local Wildlife Site (Kings Hill Golf Course, Cattering & Hoath Woods) and areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for the site will be updated to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites, or Ancient Woodland, or contains a locally designated site." Although site 59800 does not overlap a Local Wildlife Site, it is located directly adjacent to the Kings Hill Golf Course, Cattering & Hoath Woods Local Wildlife Site and areas of Ancient Wodland.</p> <p>Site 59797 receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield land and contains Grade 1 and 2 agricultural land.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>With regard to the respondent's 'Example reasons for objections', the SA gives consideration to Ancient Woodland, Local Wildlife Sites and green infrastructure assets, but does not specifically explore Defra's National Forest Inventory (NFI), which is used to monitor woodland and trees within the UK. As the SA is high-level, the NFI is considered too detailed for use in the SA. The SA is also too high-level to consider Tree Protection Orders (TPOs).</p> <p>Consideration is given in the SA to development outside of settlements under SA objective 6: landscape and townscape. If development is not located near any settlements in a rural location, a site is likely to have significant adverse effects in relation to landscape, as development cannot as easily be integrated into existing built development than if it were within or on the edge of a settlement, and therefore has more potential for adverse effects in relation to landscape character. This objective also looks at which sites are within close proximity of an AONB or not.</p> <p>As mentioned already, the SA is too high-level to give consideration to traffic congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic.</p> <p>Historic environment is dealt with under SA objective 7: heritage and if a site is within 250m of a heritage asset as recorded in the Kent Historic Environment Record, it receives an uncertain significant negative effect. All effects against this objective are uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The Agricultural Land Classification is considered under SA objective 9: soil. If sites comprise Grade 1 or 2 agricultural land, they receive a significant negative effect. If sites comprise Grade 3 agricultural land, they receive an uncertain significant negative effect as the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p> <p>Lastly, loss of public open space is addressed under SA objective 1: health and wellbeing.</p>
42609601	Q8 of the questionnaire	<p>"Here I have used an example of one your Rural Service Centres at East Peckham, site 59682, which is a location I know and as a resident of the Borough I cannot look at all the proposals, but I will focus on the one site ref. 59682 (Land south of Church Lane, East Peckham).</p> <p>I consider that this Site has a greater potential to score more positively than the 'Minor Negative' scored with regard to SA2 'improving equality and access to community facilities and services'. This is because the site is sustainably located in proximity to the facilities and services available at East Peckham, which are all</p>	<p>Site 59682 receives a minor negative effect in relation to SA objective 2: services and facilities, as it falls within the Fair Accessibility Band in the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria. The SA acknowledges under SA objective 10: climate change mitigation that although the site is more than 800m of a railway station, it is within 400m of a bus stop.</p> <p>Although the respondent notes that the site is subject to a planning application that includes a new community facility, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>accessible via foot, cycle or bus. In addition, I would highlight that the Site is currently subject to a planning application (ref. 21/03353/FL) that includes a new community facility, designed specifically provide accommodation for providers delivering health care for older people.</p> <p>With regards to SA5, I consider that the site has the potential to scope more positively than an 'uncertain minor negative' and certainly should not be scored any worse than a 'minor negative'. This is because while I acknowledge the SA does not take into account the potential for landscape mitigation, I would highlight that current planning application for the site demonstrates how a scheme could be progressed at the site that sensitively responds to its landscape context. This can be achieved via the sensitive placement of development, retention and incorporation of key landscaping feature and mitigation measures within the Site including native tree planning. This is evident from the Landscaping scheme submitted to support the planning application at Church Lane. The Landscaping scheme provides a landscape strategy comprising the retention of the existing hedgerows and trees that border the Site and those which currently divide the two parcels of land. The proposal will also add generous buffer zones to the edges of the Site. The Site will also provide good areas of public open space. The public open space will provide new landscaping such as wildflower and grass meadows.</p> <p>SA6 relates to the character and appearance of streetscapes of development in relation to existing settlements, particularly how new development should enhance or reflect the existing pattern of development. I consider that the Site has potential to score more positively than 'uncertain minor negative', and certainly should not be scored any worse than a 'minor negative'. This is because, the SA does not take into account the potential for mitigation, the current planning application has demonstrated a way in which a development could be progressed at the site provide a range of typologies, building heights and streetscapes reflective of the mixed character of the settlements of Hale Street and East Peckham.</p> <p>SA9 relates to the conservation and enhancement of soil resources and the guarding against land contamination. SA9 scores the site as a 'Significant Negative'. I do not agree with how the Site has been assessed, as the Site has been incorrectly identified as Grade 1 agricultural land. However, the Agricultural Land Classification Report submitted in support of the planning application at Land South of Church Lane identifies that all East Peckham and the surrounding land is covered by Grade 2-3 agricultural land. I believe the score for SA9 should be scored as a 'Minor Negative' in light of the above.</p> <p>In addition, at 3.2ha of BMV land, the proposals would not represent "significant development" of agricultural land in NPPF terms as the site falls well below the guideline figure of 20ha in order to constitute</p>	<p>provision of a community facility). The SA is too high-level to give consideration to individual planning applications for sites, and giving consideration to supporting documents would result in not all sites being appraised on a consistent basis.</p> <p>SA objective 5: biodiversity and geodiversity does not cover landscape, which is covered separately under SA objective 6: landscape and townscape. Site 59682 receives an uncertain minor negative effect in relation to SA objective 6 as it is located on the edge of a settlement and so there is potential for it to be more easily integrated into existing built development, compared to more rural and isolated sites. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. a landscaping scheme). All adverse effects against this objective are recorded as uncertain, as the actual effects are dependent on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The site receives a significant negative effect against SA objective 9: soil, as it is greenfield and comprises Grade 2 agricultural land. The SA looks at whether sites comprise best and most versatile agricultural land, not whether proposals would or would not represent significant development on best and most versatile agricultural land.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>"significant development". Accordingly, the loss of the site would comply with the NPPF (para 174) in terms of the loss of BMV.</p> <p>The Site was assessed as a 'Minor Positive' against SA14, which relates to providing a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures. The submitted planning application clearly shows that through the efficient use of the Site the land has capacity to deliver 69 residential units towards the 839dpa Standard Method target for the Borough if the allocation were to come forward. The Site is therefore, considered to be a medium size which could be delivered in the first few years of the Plan period. I consider that this would provide more than a minor positive benefit. Thus, the score should be upgraded to 'Positive'.</p> <p>Indeed, I would highlight that Site 59682 scored sufficiently highly in the SA for the previous draft Local Plan to support the proposed released of the Site from the Green Belt in that draft local plan and its allocation for residential development under draft Policy LP25 (t) and (v)."</p>	
45742881	Q8 of the questionnaire	<p>"Review of the Interim Sustainability Appraisal – Site Specific</p> <p>Within the Interim Sustainability Appraisal (at Annex 1) an initial summary of all the present 292 sites promoted to the council has been produced. BDW's Land at Bunyards, Beaver Road being identified with reference 59852, at pages 265 to 267 of the Interim SA.</p> <p>The Consultation Plan makes clear in numerous places the Council have not yet committed to any preferred or proposed site allocations across/from within the 292 promoted sites.</p> <p>Given the importance of the SA process in selecting the most sustainable sites for potential allocation we have reviewed the site-specific SA assessment carried out on BDW's land at Bunyards. Overleaf, we present our assessment of the council's analysis for site ref. 59852.</p> <p>Where the level of constraint has been overstated or misunderstood in the Interim SA, we have presented an appropriately revised score.</p> <p>List of Sites – Appendix B: Table 9 of the Main Local Plan Consultation Document</p> <p>Whilst not a matter the Consultation Document specifically raises a question or invites comments to be made upon, for completeness, we note BDW's site ref. 59852 is included to have a potential yield for 372 homes. As demonstrated by BDW's already submitted planning application, ref. TM/22/00409/OAEA, the land at Bunyards is capable</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>These are 'policy-off' appraisals and so sites are appraised on their physical constraints only, with no consideration given to mitigation. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). Therefore, the minor negative effect it receives in relation to SA objective 2 is correct.</p> <p>The site's proximity to healthcare facilities and open space is considered separately under SA objective 1: health and wellbeing. The site receives a significant positive effect against this objective, as it is within 800m of existing healthcare facilities, open space and walking paths.</p> <p>The site's proximity to schools is considered separately under SA objective 3: education whereby the site receives a minor positive effect as it is within 800m of at least one primary school (Palace Wood Primary School and Allington Primary School). All effects against this objective are uncertain, as school capacity is unknown.</p> <p>Site 59852 contains green infrastructure assets and they are in the form of trees and thick vegetation, which could be lost as a result of development. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>of delivering up to 435 new homes. This is demonstrated by the application's supporting parameter plan drawings, the concept masterplan, the Design and Access Statement, etc.</p> <p>Accordingly, BDW would encourage the Council to recognise the site's development potential as work on the emerging local plan continues here on."</p>	<p>infrastructure assets dataset includes a wide variety of features which may vary in their value". The significant negative effect is recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. It is important to note that this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). If the site was allocated in the Local Plan via policy containing mitigation measures, it would be appraised on a 'policy-on' appraisal.</p> <p>Site 59852 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is not located inside of or on the edge of a settlement. However, we note that it is within close proximity to Allington in Maidstone, although boundary data was not available for settlements outside of Tonbridge and Malling. In the next iteration of the SA Report, this will be added to the 'Difficulties and Data Limitations' section. This is a 'policy-off' appraisal and so consideration cannot be given to the site promoter's assessment of landscape and visual amenity impacts, as all sites must be appraised on a consistent basis and information like this is not available for other sites. The same applies in relation to SA objective 7: heritage and the Archaeological Statement and Built Heritage Statement submitted by the promoter.</p> <p>The appraisal of site against SA objective 7: heritage is not misplaced, as the site is within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record. Again, consideration cannot be given to the site promoter's Heritage Impact Assessment, as this level of detail is not available for all sites and they need to be appraised on a consistent basis.</p> <p>With regard to SA objective 8: water, consideration is not given to the supporting documents submitted by the respondent, which includes a flood risk assessment and drainage strategy. This is due to the fact all sites must be appraised on a consistent basis. It is correct for the SA to acknowledge the fact the site contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively being pursued for agricultural purposes.</p> <p>With regard to SA objective 13: material assets and waste, the site has been appraised in line with the site assessment criteria, which states "The effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed".</p> <p>The site receives a significant positive effect in relation to SA objective 14: housing, as it will deliver 100 homes or more. Sites receive minor positive effects if they will provide fewer than 100 dwellings.</p>
45788993	Q8 of the questionnaire	We disagree with SA of site 59811 as promoting health and wellbeing – would harm Green Belt, surrounded by footpaths and open	Site 59811 receives a minor positive effect in relation to SA objective 1: health and wellbeing because, in line with the site assessment

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>countryside. Agree that on all other measures it would represent a negative impact to the identified strategic assessments. As off-grid, most likely domestic heating oil would be used in any large-scale development which would harm air quality. Sustainability Appraisal - Options 4 and 5 are judged to have significant negative impacts on biodiversity and geodiversity, cultural heritage, landscape character, on greenhouse gas emissions and air quality. They have slight negative impacts on access to facilities and services, on health and wellbeing, and on educational attainment. Whereas Options 1, 2, and 3, are judged to significantly positively impact on encouraging sustainable economic growth, business development, and economic inclusion across the borough, and less of a negative impact on the areas above.</p>	<p>criteria, it is within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both).</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Noted.</p>
45793505	Q8 of the questionnaire	<p>"Plan number 59735</p> <p>I am writing to OBJECT most strongly to the proposal to build on the site at Horns Lodge Lane plan number 59735</p> <p>I am a resident.</p> <p>My objections to the proposals are as follows:</p> <p>Objective 1 mentions that it is within 800m of an existing healthcare facility.</p> <p>Medical centres in the area are already at capacity and not taking on any further patients.</p> <p>They cannot sustain any more growth in the area without serious impact upon existing residents.</p> <p>Objective 2.</p> <p>Public transport facilities and roads need to be improved first before any more development</p> <p>Objective 3</p> <p>Whilst new developments can stimulate the provision of more education facilities, this cannot be relied upon. Existing school are already at capacity and cannot sustain any more growth without impacting upon pupils.</p>	<p>It is important to note that the Interim SA Report provides an appraisal of all reasonable alternative development site options, so as to help the Council determine which sites to allocate and not allocate in the Local Plan.</p> <p>The proforma for site 59735 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/ walking and cycle path/ play area/ sports facility (but not both). Specifically, the site is within 800m of open space and a walking path, not a GP surgery. Regardless, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>Access to public transport facilities is considered separately under SA objective 10: climate change mitigation, not SA objective 2: services and facilities.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the significant negative effect is recorded as uncertain as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p>

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		<p>Objective 4</p> <p>The location of this site will not directly influence sustainable economic growth or the delivery of noticeable employment opportunities in the area.</p> <p>Objective 5</p> <p>The site also contains an existing green infrastructure asset that could be lost as a result of new development. The effect would be adverse, as it would not be possible to conserve this.</p> <p>Objective 6</p> <p>The site is within 500m of the AONB of the area and would result in the loss of designated open spaces. We have to preserve our GREEN BELT and areas for wildlife.</p> <p>Objective 7</p> <p>The site is located within 250m of a heritage asset. Development would impact adversely upon this.</p> <p>Objective 8</p> <p>The site is either entirely or largely ($\geq 25\%$) within Flood Zone 3, within a 1 in 30 year risk of flooding. There are no provisions to deal with this</p> <p>Objective 9</p> <p>The site is a greenfield site, and contains agricultural land which needs to be preserved. It is also surrounded by GREEN BELT. It should therefore be conserved as such.</p> <p>Objective 10</p> <p>Any development will lead to more greenhouse gas emissions, not less.</p> <p>Objective 11</p> <p>The location of this development will not affect an objective to improve climate change.</p> <p>Objective 12</p> <p>The site is not within 100m of an AQMA. (Air Quality Management Area) so this objective could not be measured.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 8: water, if the site is allocated in the Local Plan, it is very possible that mitigation would be provided through policy wording.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 12: air quality, site 59735 has been appraised in line with the site assessment criteria. As it is not within 100m of an AQMA, it receives a negligible effect.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development.</p> <p>With regard to SA objectives 4: economic growth, 7: heritage, 11: climate change adaptation and 13: material assets and waste, respondent has not expressed any disagreement over the effects given.</p> <p>The SA is too high-level to consider road width and congestion, and so the Council will commission additional evidence on matters including traffic.</p>

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		<p>Objective 13.</p> <p>The site is within a minerals safeguarding area and as such should be preserved.</p> <p>Objective 14</p> <p>This substantial amount of housing, cannot be supported by existing infrastructure. It cannot therefore be classed as a suitable site for providing high quality housing of a suitable mix of type and tenure.</p> <p>The development would increase the number of cars at a very narrow part of the A227 which would be hazardous.</p> <p>The A227 is already a major bottle neck in the area for all through traffic from the Borough Green to and from Tonbridge. It a rural road and very narrow in places. A development of this size will only further add to the congestion and pollution in the area.</p> <p>I object most strongly to PLAN 59735"</p>	
45934529	Q8 of the questionnaire	<p>"PLEASE SEE SEPARATE PDF DOCUMENT ATTACHED TO EMAIL SUBMISSION:</p> <p>Objections to Local Plan Sites In & Around Kings Hill_Richard Watters ME19</p> <p>4EG.pdf"</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>It is not within the scope of the SA to consider the capacity of rail services. The SA is too high-level to give consideration to the availability of car parking spaces, road width and congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic and air quality.</p> <p>With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA also does not take into consideration the capacity of schools. The site assessment criteria for SA objective 3: education in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

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			<p>The SA acknowledges that development of sites 59797 and 59800 would result in the loss of open space, under SA objective 1: health and wellbeing. The sites are expected to have mixed uncertain significant negative and minor positive effects in relation to this objective. The minor positive effects are due to the fact both sites are close to other areas of open space and walking paths.</p> <p>Although not explicitly stated in the proforma, the SA does acknowledge the fact sites 59797 overlaps a Local Wildlife Site (Kings Hill Golf Course, Cattering & Hoath Woods) and areas of Ancient Woodland. In the next iteration of the SA Report, the proforma for the site will be updated to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites, or Ancient Woodland, or contains a locally designated site." Although site 59800 does not overlap a Local Wildlife Site, it is located directly adjacent to the Kings Hill Golf Course, Cattering & Hoath Woods Local Wildlife Site and areas of Ancient Wodland.</p> <p>Site 59797 receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield land and contains Grade 1 and 2 agricultural land.</p> <p>With regard to the respondent's 'Example reasons for objections', the SA gives consideration to Ancient Woodland, Local Wildlife Sites and green infrastructure assets, but does not specifically explore Defra's National Forest Inventory (NFI), which is used to monitor woodland and trees within the UK. As the SA is high-level, the NFI is considered too detailed for use in the SA. The SA is also too high-level to consider Tree Protection Orders (TPOs).</p> <p>Consideration is given in the SA to development outside of settlements under SA objective 6: landscape and townscape. If development is not located near any settlements in a rural location, a site is likely to have significant adverse effects in relation to landscape, as development cannot as easily be integrated into existing built development than if it were within or on the edge of a settlement, and therefore has more potential for adverse effects in relation to landscape character. This objective also looks at which sites are within close proximity of an AONB or not.</p> <p>As mentioned already, the SA is too high-level to give consideration to traffic congestion. To inform plan-making, the Council will commission additional evidence on matters including traffic.</p> <p>Historic environment is dealt with under SA objective 7: heritage and if a site is within 250m of a heritage asset as recorded in the Kent Historic Environment Record, it receives an uncertain significant negative effect. All effects against this objective are uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The Agricultural Land Classification is considered under SA objective 9: soil. If sites comprise Grade 1 or 2 agricultural land, they receive a significant negative effect. If sites comprise Grade 3 agricultural land,</p>

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			<p>they receive an uncertain significant negative effect as the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to also take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p> <p>Lastly, loss of public open space is addressed under SA objective 1: health and wellbeing.</p>
45876449	Q8 of the questionnaire	<p>"Site 59737</p> <p>This is greenbelt land, effectively an extension/arm of the Platt Woods ancient woodland retaining the separation of rural settlements.</p> <p>SA Objective 1 – It will be 2400m to existing health centre – SIGNIFICANT NEGATIVE</p> <p>SA Objective 3 – To improve education – this is dubious as there may not be sufficient educational places available – SIGNIFICANT NEGATIVE</p> <p>SA Objective 5 – To protect and enhance bio diversity – This cannot be the case as there are badgers, slow worms and a host of other wildlife, trees (ancient woodland) and plants in this area – SIGNIFICANT NEGATIVE</p> <p>SA Objective 6 – To protect and enhance the boroughs landscape and townscape character and quality – The site is located on the edge of a settlement. It is greenbelt land. The purpose of greenbelt is to prevent merging of settlements. Development of this site would merge the rural settlements of Platt and Wrotham Heath. The former Platt school site has sat demolished and vacant for over a year. This type of brownfield site should be developed prior to the development of greenbelt land which can only be removed from greenbelt in exceptional circumstances. – SIGNIFICANT NEGATIVE</p> <p>SA Objective 7 – heritage asset – this must not be harmed – SIGNIFICANT NEGATIVE</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination – The site is greenfield land and contains a significant proportion of ancient woodland and agricultural land – SIGNIFICANT NEGATIVE</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change - Unless it is a net zero development greenhouse gas emissions will be increased as a result the development process.</p> <p>Increased car use on the very busy Maidstone Rd will also result in increased gas emissions/air quality/noise pollution – SIGNIFICANT NEGATIVE</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The presence of Ancient Woodland is dealt with under SA objective 5: biodiversity and geodiversity.</p> <p>With regard to SA objective 1: health and wellbeing, the proforma for site 59737 states is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). As the site is within 800m of open space and walking path, it receives a minor positive effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, as the site is located on the edge of a settlement it receives an uncertain minor negative effect. This is because there is potential for development on the edge of a settlement to be more easily integrated into existing</p>

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		<p>SA Objective 12: To protect and improve air quality Increased car use on the very busy Maidstone Rd will also result in increased gas emissions/air quality/noise pollution – SIGNIFICANT NEGATIVE</p> <p>SA Objective 13: To protect material assets and minimise waste -The site is within a Minerals Safeguarding Area - SIGNIFICANT NEGATIVE"</p>	<p>built development, compared to more rural and isolated sites. As mentioned already, Green Belt is not considered in SA.</p> <p>With regard to SA objective 7: heritage, the site is already recorded as having a significant negative effect. All effects against this objective are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 9: soil, the site is already recorded as having a significant negative effect. As stated in the proforma for the site, the uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Ancient woodland is considered separately under SA objective 5, as has been taken into consideration in the SA.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. Air quality is considered separately under SA objective 12.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59737 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, the SA acknowledges the fact the site is located within a Minerals Safeguarding Area. In line with the site assessment criteria, it receives an uncertain minor negative effect as a result of this.</p>
38435937	Q8	<p>Many Sites are incorrectly described as being near a Railway Station when the railway is on the other side of the river and there is no nearby bridge (59766, 59851, 59674, 59670, 59678, 59847)</p> <p>59676 - Development on the east side of this site would have a negative impact on the setting of Listed Buildings to the north and south.</p> <p>There would also be a negative impact on the view to and from the North Downs AONB.</p> <p>Development on Sites 59831, 59675, 59763, 59702 would have a negative impact on the setting of the North Downs AONB</p>	<p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater.</p> <p>Site 59676 is recorded in the SA as receives a significant negative effect in relation to SA objective 7: heritage, due to the fact it is within close proximity of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Sites 59831, 59675 and 59763 are not within 500m of the AONB, and so they are not considered to have an adverse effect on the setting of the AONB. They do, however, still receive significant negative effects in relation to SA objective 6: landscape and townscape due to the fact they are not located near any settlements in a rural location. Site 59702 is within 500m of the AONB and so receives a significant negative effect in relation to this objective. All adverse effects against this objective are recorded as uncertain, as they depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p>

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42718401	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover a unique area of open greenbelt land which sits between Tonbridge, Hildenborough and Shipbourne and has many bridleways and footpaths and so is accessed and enjoyed by horse-riders, cyclists and walkers. Development on these sights would have a devastating impact on the openness and permanence of the greenbelt land between Coldharbour Land and Horns Lodge Lane.</p> <p>2. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes. Sites 59801 and 59798 correctly have SA2 assessed as '-' and as such are flagged as least suitable for development. Sights IDs 59735, 59835 and relevant parts of 59804 should be equally scored '-' for SA2 and as such should also be ranked amongst the least suitable.</p> <p>3. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), climate change (SA11) and local air quality (SA12).</p> <p>4. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community.</p> <p>Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>5. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>6. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>7. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p> <p>8. Previous application to move a Dutch barn for stables on to sight IDs 59798, 59835 and equivalent section of 59804 was rejected due to impacting the openness of the greenbelt.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>
42373025	Q8	The suggested distances appear rather arbitrary and could lead to over development near schools and surgeries	Further information on the suggested distances is provided in Appendix D of the Interim SA Report, under paragraph D.2.
42036737	Q8	Appendix D sets out the criteria for assessing the various sites. These are fairly standard criteria use in sustainability appraisals.	Due to the high-level nature of SA, it is common to make assumptions regarding sufficient critical mass to support the delivery of new

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		<p>The next step needs to be to assess the existing facilities in the various settlements and to see what benefits new planned development could bring.</p> <p>For instance, Addington currently has a pub, café and community hall. Despite a lot of development over recent years no new facilities have been provided. New planned development could go hand in hand with additional facilities and enhanced public transport provision.</p>	<p>essential services and facilities. It is not, however, within the scope of the SA to specifically assess existing facilities and the benefits new planned development will bring, but this is something that will be considered in the masterplans for larger sites and at planning application stage.</p>
42441729	Q8	<p>Site 59758 is not a 'Fair Accessibility Band'. Accessibility is difficult at both ends of Beech Road, and the roads leading off it. Currently it has a 7.5CWT limit for lorries.</p>	<p>This comments relates to site-specific access, which the SA is too high-level to consider. Site 59758 receives a minor negative effect in relation to SA objective 2: services and facilities, as it is recorded in the Urban Capacity Study (July 2022) as falling within the Fair Accessibility Band.</p>
42318689	Q8	<p>59787 would have a negative effect on carbon emission the bus service is now greatly reduced.</p> <p>59818 a large proportion of this land was used for mineral extraction, Margets Pit, and has been used as waste in fill. I do not believe adequate records of waste used to fill this pit have been kept, therefore the health of potential residents is in question. Again, would have a negative effect on carbon emission the bus service is now greatly reduced and the western 1/2 seems to be more than 400 metres from the bus stop. SA Objective 5 is correct and would certainly result in the loss of green land which is now being farmed. There are areas here which have provided for amphibians and have also been encouraged there from the Peters Village development.</p> <p>59784 & 59832 one part of this site (see 51819), adjacent to the southwest side of the school & Bell Lane is already in the planning process; the remainder of this site I had understood was to provide recreational facilities for Burham residents. The health & wellbeing of existing residents would be significantly, adversely affected. All of this site is at present used for very productive arable land. Again, would have a negative effect on carbon emission the bus service is now greatly reduced.</p> <p>59820 There are areas here which have provided for amphibians and have also been encouraged there from the Peters Village development. There is significant bird life using the mud flats at low tide, increasing the adverse effect on biodiversity.</p> <p>59826 has the potential to completely change the character of an existing settlement, it could more than double the housing & population of Eccles, the existing access roads are country lanes which at peak times already suffer congestion. This site has been left as a natural habitat for many years and now has a significant population of wildlife including migratory nightingales & warblers. Sites chosen by nightingales have a particular biodiversity which takes many years to develop & cannot be recreated instantly by man, these endangered birds would simply have nowhere to go.</p>	<p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. Sites 59787, 59831, 59666, 59633, 59826, 59702, 59841, 59787, 59818, 59784, 59819, 59832, 50791 and 597992 receive minor positive effects in relation to SA objective 10: climate change mitigation, as they are within 400m of a bus stop but more than 800m from a railway station.</p> <p>The SA acknowledges in the proforma for site 59818 that it is within a Minerals Safeguarding Area, under SA objective 13: material assets and waste. Therefore, it receives a minor negative effect in relation to this objective. The effect is recorded as uncertain, as it is not clear whether the site would offer a viable opportunity for minerals extraction. If it has already been extracted and now used for landfill as suggested by the respondent, this will be addressed later on in the planning process, as part of any planning application.</p> <p>As stated in the 'Difficulties and Data Limitations' section of the SA, distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater. As mentioned already, SA objective 10 (and SA objective 4 for mixed use and employment site options) do not take into consideration the frequency of bus services. Site 59818 receives a minor positive effect in relation to SA objective 10: climate change mitigation, as it is within 400m of a bus stop but more than 800m from a railway station.</p> <p>If a site is already going through the planning application process but is not yet built out, it may still be considered a reasonable alternative development site option and so should be subject to SA. Sites 59784, 59832 and 59819 are all considered reasonable alternative development site options. The SA acknowledges each site as comprising best and most versatile agricultural land, and so they all</p>

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		<p>59684 again has the potential to completely change the character of an existing settlement. The Northwest end of this site also includes areas with migratory nightingales.</p> <p>59766, 59851, 59674, 59670, 59678, 59847, 59676, 59684, Objective 10 the access to a railway station would be through Aylesford most likely by car, with no commuter bus service this would be a significant negative.</p> <p>59831, 59666, 59633, 59826, 59702, 59841, 59787, 59818, 59784, 59819, 59832, Objective 10 the bus service is now only school service & 2 days a week, significant negative.</p> <p>59763 Objectives 10, 11 & 12 significant negative this is good arable land.</p> <p>59791, 59792, Objective 10 the bus service is now only school service.</p> <p>59787 I believe this land is allotments so would fail to meet Objective 1</p>	<p>receive significant negative effects in relation to SA objective 9: soil. They are also all within 400m of a bus stop but more than 800m of a railway station, and so receive minor positive effects in relation to SA objective 10: climate change mitigation.</p> <p>Sites 59820 and 59684 already receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59826 already receives significant negative effects in relation to SA objectives 5: biodiversity and geodiversity and 6: landscape and townscape. All effects against SA5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. All adverse effects against SA6 are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Sites 59766, 59851, 59674, 59670, 59678, 59847, 59676 and 59684 all receive significant positive effects in relation to SA objective 10: climate change mitigation, as they are within 800m of a railway station. This is in accordance with the site assessment criteria.</p> <p>Arable land is dealt with under SA objective 9: soil, which covers the Agricultural Land Classification. Site 59763 is recorded in the SA as receiving a significant negative effect in relation to SA objective 9, as it comprises Grade 1 and/or 2 agricultural land.</p> <p>Site 59787 is not recorded as comprising allotments, in the GIS data provided to inform the SA at this stage.</p>
39036065	Q8	<p>Site 59740 Broadwater Farm</p> <p>Due to the character limit on responses via this platform I have submitted my full answer to this question via email. Overall I believe the TMBC's published evaluation of this site against the Sustainability Assessment Objectives, although not particularly positive, actually understates the negatives and over-states the positives for many Objectives. This area is rich in heritage, cultural, landscape, community and farming assets. Areas of the site are protected by Listed Building status, Conservation Area status, KCC Ancient Monument guidance and Quiet Lane designations. The farmland of the site is also, overall, better quality than "best and most versatile". TMBC are in possession of a robust bank of data to suggest this site is unsuitable for large scale developments and I believe this site should not go forward in the Local Plan process.</p>	<p>The SA utilises a precautionary approach and is therefore not overly-optimistic in its appraisal of the Regulation 18 Local Plan. Site 59740 is recorded in the SA as having a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. Site 59740 is also recorded as having a significant negative effect in relation to SA objective 9: soil, as it comprises best and most versatile agricultural land. Please refer to the proforma for this site, which presents the effects it is likely to have in relation to each of the SA objectives.</p>
25400737	Q8	<p>"59708</p> <p>Questions posed are not relevant to small developments (this is for three houses) and therefore the assessment is not helpful. In principle a small development may work in this area however there are</p>	<p>With regard to site 59708, the SA is too high-level to give consideration to site-specific access points and road safety.</p> <p>Site 59840 meets the definition of brownfield land. The SA acknowledges that site 59840 is within the AONB and so receives a significant negative effect in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as</p>

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		<p>significant access issues (private land) and safety concerns due to close proximity to a successful preschool and well utilized footpath."</p> <p>"59840</p> <p>The Parish Council does not agree that the whole of this site qualifies as brownfield land. The eastern part of the site has derelict buildings and structures, and we agree that this is brownfield and appropriate development might be considered here. Although parts of the remainder of the site were subject to landfill, this has to a certain extent now blended into the landscape and the previous use of the site should not be used to justify extensive built development over the whole site. Development of this site would also be highly visible within the AONB.</p> <p>"59691</p> <p>Agree with assessment, not a sustainable site"</p> <p>"59863</p> <p>Agree with assessment, not a sustainable site"</p> <p>"59864 and 59866</p> <p>Part of this site is in the parish of Birling however this is not acknowledged in the consultation. The site is adjacent to an area of Special Scientific Interest, highly visible from AONB and is Grade 2 farmland."</p>	<p>uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Sites 59864 and 59866 receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity due to the fact they are within close proximity to SSSIs, contain a Local Nature Reserve and Local Wildlife Site, and are within close proximity of numerous areas of Ancient Woodland and Local Wildlife Sites. Site 59866 also contains an area of Ancient Woodland. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The SA also acknowledges that both sites comprise Best and Most Versatile Agricultural Land.</p>
42831905	Q8	<p>See separate statement. In summary, we have identified inconsistencies of approach to a number of sites at Hadlow within the Regulation 18 SA. These inconsistencies relate to sites 59647, 59635 and 59853 (and the duplicate of the latter, 59857). In addition, we have identified inconsistencies relating to a number of SA scores for site 59842 compared with other sites, as well as inaccurate/misleading assessments for the wider site. In particular the results of SA Objectives 2, 7 and 9 are demonstrably incorrect. We append our full assessment to our letter attached to an email submitted as part of these representations.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). As sites 59647 and 59635 are placed within the Good Accessibility Band in the Urban Capacity Study, they both receive negligible effects in relation to this objective. As sites 59853, 59857 and 59842 fall within the Fair Accessibility Band in the Urban Capacity Study, they receive minor negative effects in relation to this objective.</p> <p>With regard to SA objective 7: heritage, also sites listed are within 250m of numerous other heritage assets, as recorded in the Kent Historic Environment Record. It is therefore correct that all sites receive significant negative effects in relation to this objective. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 9: soil, site 59842 receives an uncertain significant negative effect whereas sites 59647 and 59635 receive significant negative effects. This is because site 59842 contains a significant proportion of Grade 3 agricultural land but it is unknown</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			whether it is Grade 3a (high quality) or Grade 3b (not classed as high quality) agricultural land, hence the uncertainty. Sites 59647 and 59635 on the other hand contain a significant proportion of Grade 1 and/or 2 agricultural land. Grades 1, 2 and 3a are considered best and most versatile agricultural land. Sites 59853 and 59857 receive significant positive effects in relation to SA objective 9: soil, as they comprise brownfield land.
42832225	Q8	<p>The following site numbers are sites containing or adjacent to Ancient Woodland. The Woodland Trust would expect ancient woodland to be identified in the sustainability appraisal, however there is simply general reference made to "internationally or nationally designated biodiversity or geodiversity sites".</p> <p>59406 59424 59425 59506 59521 59524 59599 59603 59612 59624 59627 59630 59634 59646 59653 59655 59665 59668 59669 59676 59679 59684 59690 59712 59722 59723</p>	<p>Ancient Woodland has been considered in the SA, under the SA objective 5: biodiversity and geodiversity. However, it has been covered under the term 'nationally designated sites', despite the fact it is not a national designation. Therefore, the SA has correctly acknowledged when a site contains or is within close proximity of Ancient Woodland. In the next iteration of the SA Report, the site assessment criteria and proformas for each site will clearly distinguish between nationally designated sites and Ancient Woodland.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
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Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		59869 59877 59895	
42442561	Q8	<p>Site 59797 and 598000 Development on any of the golf course would result in the loss of golf course and loss of businesses that operate it (which provides employment for local residents).</p> <ul style="list-style-type: none"> • Impact of Wildlife as Golf Course is designated by the Environment Agency as a Local Wildlife Site as part of the nature conservation sites in their screening report for Nature and Heritage Conservation in 2019. • Area is part of Green Belt • Approval for Kings Hill development was based upon 40% of the area remaining green space with the golf course an agreed amenity. • Loss of Agricultural land • Development risks impacting designated Historic Woodland adjacent to site. • Loss of recreation facilities for golfers, and public footpaths used by walkers, dog walkers, and cyclists would adversely impact health and well-being of local residents in contradiction to SA Objective 1 • Road Infrastructure cannot support current traffic demands with bottlenecks regularly occurring on A228 and no easy options to address 	<p>Sites 59797 and 59800 receive uncertain significant negative effects in relation to SA objective 1: health and wellbeing, as they contain Kings Hill Golf Course. SA objective 4: economic growth relates to the delivery of employment opportunities. Both sites are expected to have a negligible effect in relation to SA objective 4 as "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>The sites receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within 250m of Kings Hill Golf Course, Cattering & Hoath Wood Local Wildlife Site and area of Ancient Woodland. They also contain green infrastructure assets. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Both sites receive significant negative effects in relation to SA objective 7: heritage, as they are within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as effects depend on factors such as the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA is too high-level to consider traffic levels and bottlenecks.</p>
38882465	Q8	<p>The assessment is not balanced. Building on car parks in West Malling can impact the vibrancy of the village with more residents shopping and socialising outside the Borough in Maidstone, Tunbridge Wells and Bluewater. This could lead to economic decline of that area.</p> <p>Hoath Wood has been designated as brownfield even though much is ancient woodland protected by TPOs.</p>	<p>The purpose of SA is to assess all reasonable alternative development site options. Site 59634 contains Hoath Wood and so receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59634 is incorrectly recorded as comprising brownfield land. In the next iteration of the SA Report, it will be recorded as comprising greenfield land and so will receive a different effect in relation to SA objective 9: soil.</p>
42616929	Q8	This is in relation to 59608. It is the only one I really feel I can comment on as I know that site. This is for information. It is a site that	The site receives a negligible effect in relation to SA objective 4: economic growth, as the location of residential development will not

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>is currently a nursery. This is a going concern and an active business (deliveries come to it and suppliers pick up plants from it regularly). I am surprised that this is being considered as it seems to be a business that can continue and reflects the benefits of economic growth and potential to grow further. It seems that this site is an active and sustainable economic site with potential for employment opportunities, that offers in itself important biodiversity as a green open space close to a heritage asset and AONB.</p> <p>The plan for 37 houses is quite intensive. One of the biggest issues is access. The access in the road is limited; in several places it is only a single track including in a significant single track stretch by the entrance to the site on either side which does not allow for large lorries to go through either due to it being so narrow.</p> <p>The site is opposite a nature reserve –preserving a particular highly specialised flora which could be disrupted by pollution from cars and which depends on a particular water system. https://www.kentwildlifetrust.org.uk/nature-reserves/ivy-hatch .</p> <p>I understand there is some sort of deed of covenant on either the property or the land (perhaps to do with the property being part of the nursery).</p> <p>The survey notes it is possible to get to a bus stop. However, the bus transport is incredibly limited and at the moment the buses to tonbridge were cut over the summer but have had a reprieve from being cut altogether from its one school service and one hourly service that runs for only half the day – there are very limited ways to get to any school (we experience this problem trying to get our children to secondary schools without buses). The route to sevenoaks I think only runs about 2x a day. It would be difficult to see how anyone could live there without one or two cars as there is no other reliable access to transport nor any amenities near by (it being incredibly hilly makes cycling difficult for any but the really fit). It is near a heritage asset (Ightham Mote) which also means congestion is difficult to manage at one end of the road. It is very close to AONB, in itself represents a level of biodiversity and open natural spaces – there are woodpeckers and birds of prey that live at that nursery site as well as the nature reserve opposite. When the main road was shut for repairs due to a sink hole we experienced quite how unable our road was to cope with a lot of traffic.</p> <p>What I assume is desk-based research into the site does in general reflect some recognition of the difficulties of the site including those listed above. The poor accessibility is noted for example. It notes it is nearish some amenities - The primary school is some way away - (my children went there, and in snow we walked and it took about 45 mins with little children) so again cars are necessary; that school is on a site where it would be impossible to build more. Borough Green medical practice is a drive away – certainly not walkable - and currently under so much pressure we do not really get to see a doctor any more. There are aspects noted that would need further exploration – water</p>	<p>directly influence sustainable economic growth or the delivery of employment opportunities. In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>Site 59608 is incorrectly recorded as containing a green infrastructure asset when it does not. Therefore, in the next iteration of the SA Report it will receive a minor negative effect instead of a significant negative effect, with some uncertainty. The minor negative effect acknowledges the fact the site is within 250m to 1km of an SSSI, Local Wildlife Site and Ancient Woodland</p> <p>The SA correctly acknowledges the site as being within 250m of a heritage asset, as recorded in the Kent Historic Environment Record. Therefore, it correctly receives a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA correctly records the site as within the AONB and for this reason, it receives a significant negative effect in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the final design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is too high-level to consider road width and access to the site.</p> <p>With regard to SA objective 10: climate change mitigation, the SA acknowledges that the site is within 400m of a bus stop. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>The SA is a desk-based, strategic assessment. The site was recorded in the Urban Capacity Study (July 2022) as falling within the Poor Accessibility Band and for this reason, the site receives a significant negative effect in relation to SA objective 2: services and facilities.</p> <p>With regard to SA objective 9: soils, the site comprises brownfield land as it contains development in the form of a plant nursery.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>for instance due to the brook and areas of water that runs through the nature research that could not be disturbed.</p> <p>SA objective no 9 may be something I am not really understanding but while this is a brownfield site it is a nursery so that might impact the soil assessment – it seems unlikely that building over what is a natural open green-filled space would mean less contamination (or lead to improved soil). This is a space that is natural and full of growing plants. It does in itself contribute positively to biodiversity as it is a green and thriving landscape – bringing housing would actually be detrimental to the current situation around climate change (SA 11); while SA 5 does acknowledge this to some extent it is difficult to see how housing here, even with good landscaping, could improve this.</p>	<p>the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p>
42501633	Q8	<p>Whilst the 14 Sustainability Assessment criteria for each site put forward in the local plan on the face of it makes sense, I do not believe that the assessment of each site against these criteria are accurate or reflect the true position of each site.</p> <p>Sites 59797 & 59800</p> <p>If development were to be approved on either of these two sites it would result in the loss of the Kings Hill Golf Course, which would impact the businesses that operate it, and impact local residents who are employed by them.</p> <p>The approval for Kings Hill development was based upon a 40% area remaining green space with the golf course specifically defined as an agreed amenity</p> <p>The Golf Course is designated by the Environment Agency in their 2019 Nature and Heritage Conservation report as a Local Wildlife Site for nature conservation. This would be lost if development is permitted here.</p> <p>This area provides recreational facilities for golfers, walkers, cyclists and horse riders as there are a number of public footpaths and bridle ways that cross the golf course or run around its boundary. This would adversely impact the health and well being of residents in contradiction of SA objective 1.</p> <p>Development of these sites risks impacting designated Historic Woodland adjacent to the sites.</p> <p>The use of Site 59800 would result in the loss of prime agricultural land.</p> <p>The Road Infrastructure (especially A228 from Kings Hill to Mereworth) cannot support current traffic demands with bottlenecks regularly occurring.</p> <p>Medical facilities and schools cannot support existing demand.</p> <p>Site 59761.</p> <p>This site is designated Ancient Woodland which would be lost if it was developed and is part of the green belt.</p>	<p>Sites 59797 and 59800 receive uncertain significant negative effects in relation to SA objective 1: health and wellbeing, as they contain Kings Hill Golf Course. SA objective 4: economic growth relates to the delivery of employment opportunities. Both sites are expected to have a negligible effect in relation to SA objective 4 as "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>The sites receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within 250m of Kings Hill Golf Course, Cattering & Hoath Wood Local Wildlife Site and area of Ancient Woodland. They also contain green infrastructure assets. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Both sites receive significant negative effects in relation to SA objective 7: heritage, as they are within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as effects depend on factors such as the design of development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA is too high-level to consider traffic levels, bottlenecks, road width and traffic levels, and so the Council will commission additional evidence on matters including transport.</p> <p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		The road infrastructure of the A228 next to this site cannot support existing traffic demand, the road is narrow and has blind spots and there are regular accidents on this stretch. Access to this site for dwellings (which can only be achieved from A228) would create further major issues on the A228.	<p>objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>With regard to school capacity, the site assessment criteria for SA objective 3: education in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>
42635169	Q8	<p>Site #59699.</p> <p>1. The SA Objective 1 appears to be based on out-of-date information. Since the West Mallong GP surgery closed a couple of years ago, the nearest GP surgery is over 2kms away (as the crow flies). Walking to that surgery is not practical; it would involve walking along roads with no footpaths where heavy lorries operate (Teston Road) and crossing a main Trunk Road with no pedestrian crossing facilities.</p> <p>2. Access to and egress from the site would cause critical stress on existing road infrastructure. It should be noted that Fartherwell Road is no more than a single track country lane, often flooded, throughout its length, with a few passing places, that East Street, Norman Road and Sandy Lane are single lane roads with no possibility of widening (and the present cause of congestion at East Street as it approaches West Mallong, especially at school times), and the Offham Road/Teston Road junction sightline is significantly adversely affected by bends and the speed of vehicles.</p> <p>3. The development of the land in the way set out would cause harm to the Quiet Lane scheme, be on designated green belt land and involve the loss of significant Grade 1/2 agricultural land.</p>	<p>The GP surgeries data used to inform the Interim SA Report included West Mallong GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated.</p> <p>The SA is too high-level to consider specific road networks.</p> <p>In the SA, site 59699 receives a significant negative effect (as part of a mixed effect) against SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59699 also receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield and contains best and most versatile agricultural land.</p>
42651073	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42660705	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>

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42662497	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community.</p> <p>Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42672097	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties</p>

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		<p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42675169	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42686593	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p>

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		<p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42686465	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

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		<p>compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42700225	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42702593	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p>

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		<p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42714625	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.	The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.
42714721	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42719713	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

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		<p>and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42720865	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42730497	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and</p>

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		<p>different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42801025	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore,</p>

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42833793	Q8	<p>1. Site IDs 59735, 59798, 59801, 59804 and 59835 cover the same and/or largely overlapping areas of land and yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59735, 59798, 59801, 59804 and 59835 the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site IDs 59735, 59798, 59801, 59804 and 59835 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site IDs 59735, 59798, 59801, 59804 and 59835 show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site IDs 59735, 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59735, 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42657601	Q8	<p>Commenting on Site 59811</p> <p>1]The site is not near any existing play area or sports facility. The nearest Doctors Surgery is in Hadlow. That is several miles from the closest point of the development to Hadlow.</p> <p>2] As observed the proposed site has no accessibility. The area is surrounded by three narrow lanes with no verges, street lights or bus</p>	<p>The proforma for site 59811 states that it is within 800m of either an existing healthcare facility <i>or</i> an existing area of open space/walking and cycle path/play area/ sports facility (but not both). In this instance, the site is within 800m of numerous open spaces and walking paths. Therefore, it correctly receives a minor positive effect in relation to SA objective 1: health and wellbeing.</p>

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		<p>services. The traffic is currently too busy and too fast for the size of the roads.</p> <p>3]There are 3 modest size primary schools nearby. The closest is about 4km. away from the site. Again, the roads are inadequate to deal with increased traffic and there are no bises as previously mentioned. The lanes are too narrow to safely accommodate buses and in winter too dark and dangerous for drop off etc. The secondary schools are much further away and again spaces, transport links and safety should be major red flags.</p> <p>4]Agree, it will not</p> <p>5] Some of this statement is true, it is an area of designated biodiversity and green belt. There is an array of wildlife that resides in and lives in this food-providing part of the Borough. As well as fields there are ancient hedgerows and woodlands on this site.</p> <p>6]It would indeed result in the loss, forever of a designated open space.</p> <p>7] Why designate an asset as a Heritage asset and then build all around it.</p> <p>10] Partly agree although I would say it is a major negative</p> <p>14] The document states 100 dwellings or more. The site plan suggests 2000+. The Parish of West Peckham is very small and very rural. Its identity would be lost by even a small settlement being developed.</p>	<p>The SA is too high-level to consider site-specific access points, road width and street lighting. Proximity to bus stops is considered under SA objective 10: climate change mitigation. As the site is more than 400m from a bus stop and cycle route, and more than 800m from a railway station, it receives a minor negative effect.</p> <p>Access to schools is considered under SA objective 3: education. As the site is more than 800m from a primary and secondary school, it receives a minor negative effect in relation to this objective. The effect is recorded as uncertain, as the provision of new residential development could stimulate the provision of new schools and/or school places.</p> <p>The site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>With regard to SA objective 6: landscape and townscape, the site receives a significant negative effect as it is not located near any settlements in a rural location. The effect is uncertain, as its dependent on the design, scale and layout of development. The site will not result in the loss of any designated open space.</p> <p>With regard to SA objective 7: heritage, the SA acknowledges the site's proximity to heritage assets.</p> <p>The site receives a minor negative effect in relation to SA objective 10: climate change mitigation, in accordance with the site assessment criteria.</p> <p>With regard to SA objective 14: housing, the threshold for distinguishing between significant and minor effects is 100 dwellings. Therefore, any site that will provide 100 dwellings or more receives a significant positive effect in relation to this objective.</p>
42705601	Q8	<p>Shipbourne - sites 59779, 59825, 59827</p> <p>General points applicable to all three sites:</p> <p>1. Green belt and AONB: All three sites are in the Green Belt ("GB") and the Kent Downs Area of Outstanding Natural Beauty ("AONB"), and on that basis alone should not appear in the local plan. As a result, if any of these sites were developed, they would be in conflict with established planning policy and conflict with the Kent Downs AONB Management Plan which sets out how "to conserve and enhance natural beauty" in accordance with the Countryside and Rights of Way (CROW) Act 2000, rather than build over it.</p> <p>2. Conservation Area: Furthermore, Shipbourne is an important heritage village, with the Shipbourne Conservation area and the adopted Shipbourne Design Statement setting out what is special and important about Shipbourne, and how vulnerable it is to development. One of these sites is within the conservation area and the other two on the very edge of the conservation area.</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. None of the sites appraised have yet been allocated.</p> <p>There is a lack of clear, official guidance on 'reasonableness' criteria, which leaves some room for debate as to exactly what these criteria should be but based on our professional experience and understanding of guidance and case law, we advise a precautionary approach, i.e. if in doubt, assume that a site option is 'reasonable' and subject it to SA. The bar for discounting sites as reasonable alternatives (and therefore not subjecting them to SA) is therefore quite high.Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

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		<p>3. Deliverability: All three sites are unsustainable and undeliverable unless huge changes are made to the current policies covering conservation and enhancement of this AONB village in the GB. Development of any of these sites would have a huge impact on the character and landscape of this small village which has no services other than the small primary school (which is already oversubscribed).</p> <p>4. Lack of appropriate transport infrastructure: There are not sufficient transport links to Shipbourne to accommodate housing growth (the bus stop mentioned in relation to site 59779 is only used at school times). It would be more appropriate to build where existing transport links exist.</p> <p>5. Lack of appropriate amenities: Shipbourne does not have any shops or other necessary amenities to accommodate growth (there is only a small primary school and a public house – no shops of any description). This would result in more car journeys. It would be more appropriate to build where shops and the other amenities of daily life are available.</p> <p>6. Lack of appropriate utility infrastructure: The village is not on the gas network so the current electricity grid would need upgrading to sustain any new development in these sites. Sewerage is also under pressure and overflows are already experienced as mentioned on site 59827 below. Current water utilities are inadequate to accommodate new development.</p> <p>7. Impact on nature: The area is haven for nature (deer, badger, hawks etc) and building will dislocate the natural environment.</p> <p>Further points applicable to specific sites in Shipbourne Site 59779</p> <p>In addition to the general points above:</p> <ul style="list-style-type: none"> • Poor drainage on this site, with waterlogging/flooding. • It is in my view incorrect to view the school as an “uncertain minor positive” in relation to SA objective 3, as we understand from the parish council that it is already oversubscribed with no prospect for expansion. This should be a negative. • It is incorrect, in our view to score this site as a minor positive in respect of SA objective 10. The bus stop referred to only provides a school service. As a result, any new residents would be dependent on their cars – with an attendant increase in greenhouse emissions. This in our view should be a significant negative. • For the same reason SA objective 11 should be scored a significant negative, and SA objective 12 at least a minor negative. • This site is directly opposite the school and the dangerous junction of Back Lane with the A227 (potentially causing danger and congestion at pick up and drop off times). 	<p>The SA acknowledges the fact that all three sites are located within the AONB and for this reason, all receive significant negative effects in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA acknowledges the Conservation Area and so all three sites receive significant negative effects in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>These are 'policy-off' appraisals and so consideration is not given to mitigation (e.g. conservation and enhancement of the AONB). This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Access to services and facilities is considered under SA objective 2: services and facilities, informed by the Urban Capacity Study (July 2022). Access to schools is considered under SA objective 3: education. All three sites are located within 800m of a primary school and so receive minor positive effects in relation to SA3. There is some uncertainty, however, as school capacity is unknown. The site assessment criteria in Appendix D of the Interim SA Report specifically state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown. specifically states</p> <p>The SA is too high-level to give consideration to the gas network, electricity grid, pipelines and the sewage network, but these are things that will instead be considered at planning application stage if the sites are allocated.</p> <p>Impacts on nature have been addressed under SA objective 5: biodiversity and geodiversity. All sites receive significant negative effects in relation to this objective. The effects are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>• We are also informed by the parish council that there is an active covenant on this land restricting development. It is therefore undeliverable.</p> <p>Site 59825</p> <p>In addition to the general points above:</p> <ul style="list-style-type: none"> • This site is in the conservation area. • As with site 59779, it is in our view incorrect to view the school as an “uncertain minor positive” in relation to SA objective 3, as we understand from the parish council that it is already oversubscribed with no prospect for expansion. This should be a negative. • Similarly, it is incorrect, in my view to score this site as only a minor negative in respect of SA objective 10. New residents would be dependent on their cars – with an increase in greenhouse emissions. This, in our view, should be a significant negative. • For the same reason SA objective 11 should be scored a significant negative, and SA objective 12 at least a minor negative. • In our view it is not correct to score SA objective 4 as a minor positive. In our view negligible is the correct score, as it would be wholly inappropriate in a village of this size, in the GB and AONB, to build industrial or retail opportunities for “economic growth” or “business development” opportunities. <p>Site 59827</p> <p>In addition to the general points above:</p> <ul style="list-style-type: none"> • Importantly, we understand that there are land drainage issues and a watercourse runs along the southern boundary. • The site has issues with sewage overflow. • As with site 59779 and 59825, it is in our view incorrect to view the school as an “uncertain minor positive” in relation to SA objective 3, as we understand from the parish council that it is already oversubscribed with no prospect for expansion. This should be a negative. • Similarly, it is incorrect, in our view to score this site as only a minor negative in respect of SA objective 10. New residents would be dependent on their cars – with an increase in greenhouse emissions. This in our view should be a significant negative. • For the same reason SA objective 11 should be scored a significant negative, and SA objective 12 at least a minor negative. • In our view it is incorrect to say that the significant negatives in respect of SA objectives 5, 6 and 7 should only be “uncertain”. Rather, they are “certain” significant negatives – with this site bordering Dene Wood and there being no cost-effective remediation that could maintain the biodiversity, landscape, character and cultural heritage. 	<p>Sites 59779 and 59827 are recorded as having significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. Site 59827 also contains a watercourse and this is recorded in the SA. Site 59825 receives a negligible effect in relation to SA objective 8, as it is not at risk of flooding.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proformas that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59825 is not within 100m of an AQMA.</p> <p>With regard to SA objective 4: economic growth, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. As sites 59779 and 59827 are proposed for residential development, they receive negligible effects in relation to SA objective 4. Site 59825 is proposed for mixed-use development and so receives a minor positive effect, as employment development will be delivered on-site.</p>
42721793	Q8	For each of Site 59803, Site 59845, Site 59728 and Site 59700 the document states	Although sites 59803, 59845, 59728 and 59700 are within fairly close proximity of the AQMA mentioned, they are just over 100m from it.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>"SA Objective 12: To protect and improve air quality</p> <p>Negligible (0)</p> <p>The site is not within 100m of an AQMA."</p> <p>This is incorrect. The site is within 100m as per Drawing DD / 343/3 (Management area No 3 order 2005) This AQMA has the highest levels in the Borough.</p> <p>The development of these sites will significantly increase the already very high levels of congestion on this cross roads every morning and evening with mile+ long tail backs in each direction (check Google traffic historic maps for evidence of this) as well as adding to and expanding the area of air quality concern.</p> <p>It is also the case that there has very recently been the addition of 55 homes in the Meadow View Court development in the centre of the Orpines.</p> <p>Since that development there has been a significant increase in flooding along the main road blocking half or at times the whole road. Throughout this area there are a series of complex water courses and such a major development will lead to much higher levels of water coming down the slope of the valley to cause flooding at the junction.</p>	<p>As such, they receive negligible effects in relation to SA objective 12: air quality.</p> <p>None of the sites have been identified as being at risk of flooding, including surface water flooding.</p>
44459553	Q8	<p>In relation to site references [59637], [59638] and [59686] – No. The ISA has been undertaken in insufficient detail and has not considered measures to offset impacts. Specific comments are made in relation to ISA objectives 5 (bio and geodiversity), 6 (land and townscapes), and 8 (water).</p> <p>In relation to site reference [59615] – No. The ISA has been undertaken in insufficient detail and has not considered measures to offset impacts. Specific comments are made in relation to ISA objectives 5 (bio and geodiversity), 6 (land and townscapes), 7 (cultural heritage) and 8 (water).</p>	<p>It is correct that the Interim SA Report has not considered measures to offset impacts, as this ensures all sites are initially appraised on a consistent basis (i.e. 'policy-off'). If a site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>
42829313	Q8	<p>KWT has not had the capacity to undertake a detailed assessment of all site allocations included within Annex 1. We have provided commentary below on a number of major development sites, focusing solely on SA Objective 5: To protect and enhance biodiversity and geodiversity.</p> <p>There are number of sites proposed around Eccles and Holborough, some of which KWT are commenting on at planning application stage and/or liasing with the developer regarding impacts. These include (but is not limited to) 59851, 59847, 59684, 59826 and 59864. Cumulative impacts of these schemes on sensitive wildlife sites should be considered. It mitigating for these proposals it is recommended that relevant policies require the long term management of the Local Wildlife Sites in this area.</p> <p>We feel that the presumed uncertainty of negative impacts is misleading. Where designated sites fall within the red line boundary for a site then negative impacts should be assumed. Without further detail being included within the Site Assessments it is not reasonable</p>	<p>All negative effects against SA objective 5: biodiversity and geodiversity are recorded as uncertain. As outlined in the site assessment criteria contained within Appendix D of the Interim SA Report, "Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>to assume that impacts will be avoided or mitigated. We advise that designated wildlife sites are excluded from the red line boundaries, however these could be included within a wider blue-line boundary for the express purpose of bringing the Local Wildlife Site into long term management. It is essential that a substantial buffer zone be included from the outset of scheme design.</p> <p>This presumed uncertainty of negative impacts is a common thread that runs throughout the assessment of sites. Other examples include the assessment for 59861. Dog Kennel Wood Ancient Woodland are uncertain at this stage. Further detail is required to decrease the certainty of a negative impact on biodiversity, and would require the east of the site to be allocated through this plan for biodiversity enhancements. Without such commitments there will be severe fragmentation of habitats and isolation of this ancient woodland.</p> <p>In addition, KWT would be very concerned is 59646 were progressed due to the presence of East Peckham Ponds LWS which forms part of a biodiversity corridor along the River Medway. It is not considered that the negative impacts can be assumed as "uncertain" at this stage. This site would represent a prime location for the creation of an off-site BNG scheme.</p> <p>The comments made above apply to a number of other sites and we suggest that all assessments under Objective 5 are re-considered on the basis that mitigation of impacts cannot be assumed.</p>	<p>would be determined once more specific proposals are developed and submitted as part of a planning application".</p>
42606657	Q8	<p>Site 59611. The inclusion of this vacant, brownfield, previously developed site, sandwiched between the A20 and M20, as a potential employment site is welcomed. However, its assessment within the Sustainability Appraisal against the following five of the SA Objectives should be reconsidered:</p> <p>SA Objective 4 - An industrial/warehousing allocation on the former Stocks Nightclub and Spring Villas site would contribute towards diversifying employment opportunities, increasing employment, encouraging economic growth, reducing levels of unemployment and improving physical accessibility to jobs. It therefore satisfies all of the sub-objectives of SA4.</p> <p>The reason given in the Interim Sustainability Appraisal for only attributing a 'minor positive' to the site is because it is not within 800 m of a train station or within 400 m of a bus stop. What the scoring criteria fails to take into account is that there are different types of employment, which have different locational criteria.</p> <p>Whilst it is right for high density office uses to be directed to town centres and to sites in close proximity to public transport nodes, this vacant, scrubland site is being promoted for industrial/warehousing, not offices. The NPPF only seeks to apply such a sequential approach to applications for main town centre uses, such as offices (paragraph 87). It does not apply to industry/warehousing, for which its proximity to the strategic road network, and the motorways in particular, should enable the site to score more highly.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the site is expected to have in relation to the SA objectives is provided in the proforma for the site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 4: economic growth, the site receives a minor positive effect instead of a significant positive effect because it is smaller than 5ha. It also receives a negligible effect, as it is not within 800m of a train station or 400m of a bus stop or cycle path. SA objective 4 appraises the distance employment sites are to train stations, bus stops and cycle paths, as this gives an indication of how accessible sites are to the local workforce. If a site is within close proximity of a railway station, that it will be easier for workers to reach the site.</p> <p>The SA takes into consideration air quality and due to the fact the site is not within 100m of an Air Quality Management Area, it receives a negligible effect in relation to SA objective 12: air quality.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity because it contains a green infrastructure asset in the form of woodland and thick vegetation. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value".</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The fact that industrial/warehousing units could be accessed on this site without the need for HGVs to travel through towns, where they would cause congestion and potential air quality problems, should be taken into account and should be given just as much, if not more weight, than proximity to public transport. The different characteristics of warehousing is also recognised in the NPPG. Whilst most of the guidance is focused on the big strategic facilities, it states that "the logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinctive locational requirements that need to be considered" (my emphasis) paragraph: 031 Reference 2a-031-2019 0722.</p> <p>Currently, the Borough Council is not planning specifically for industry/warehousing and is treating all employment generically. That is not appropriate here. The Council should have regard to its up-to-date Economic Development Needs Study, August 2022. It advises the Council that the largest employment sector in Tunbridge & Malling in 2021 is wholesale and transport. It goes on to identify particular growth opportunities for logistics in the Borough.</p> <p>The Economic Development Needs Study concludes that over the plan period there is a need for 292,940 m² of new industrial and storage/distribution development. This compares to just 53,320 m² of new office space (18% of the total employment requirement). Therefore greater weight should be given to the location requirements for industrial/distribution space, for which this brownfield site (ref: 59611) is ideally suited.</p> <p>It is worth noting that the Borough Council has allocated the Invicta Business Park and Marley site immediately opposite, as employment land under Policy E2 and therefore the Council has already recognised that this is an appropriate location for employment development.</p> <p>In the light of the above, the site should therefore be reclassified as having a 'significant positive' (++) in respect of the economic growth objective.</p> <p>SA Objective 5 - The Sustainability Assessment states that the site contains an existing green infrastructure asset that could be lost as a result of new development and therefore under objectives set out under SA5, the site is classified as an "uncertain significant negative".</p> <p>Having regard to the criteria, the former Stocks Nightclub and Spring Villas site is previously developed land that is not designated for nature conservation, nor are there any known rare endangered species and the landscaping belt along the M20 would remain unaffected. The site does not provide any public access for people to access wildlife or open green spaces. The main central part of the site, which would be subject to the redevelopment, could not be regarded as a green 'asset'. This is derelict scrub land that is vacant and unutilised, with limited biodiversity value. Through redevelopment, there is an opportunity to enhance the biodiversity value of the site, and therefore far from being an "uncertain significant negative", the</p>	<p>Although the respondent states that there is an opportunity to enhance the biodiversity value of the site, this is a 'policy-off' appraisal that does not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>land offers the opportunity to make a positive contribution. The site should therefore be reclassified as a 'minor positive' (+) in respect of biodiversity in the Sustainability Assessment.</p> <p>PLEASE NOTE: How a redevelopment of Site 59611 for industrial/warehousing would sit with objectives SA6, SA7 and SA10 is provided separately, due to the character limit imposed here.</p>	
42768289	Q8	<p>Site 59825: Shipbourne primary school has no capacity and therefore SA objective 3 is significant negative not minor positive. Please explain the employment development in SA4: this is not the case.</p> <p>Site 59827: almost every site in Shipbourne would be within 800m of the common; this is already overused with hundreds of cars parked round it on weekends. SA objective 3 has the same point about Shipbourne primary school and is therefore a double negative. nb SA 4 is marked neutral for this site but positive for the site above. Given their proximity this is surprising. There is no "sustainable economic growth" because there is no employment development.</p>	<p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils". Site 59825 receives an uncertain minor positive effect in relation to SA objective 3: education, as it is within 800m of Shipbourne School but it is unknown whether there is capacity at the school to accommodate new pupils or not.</p> <p>Site 59825 was incorrectly appraised as a mixed use site and in the next iteration of the SA Report will be appraised as a residential site.</p> <p>Site 59827 is located within 800m of a number of open spaces, including the common. Therefore, it receives a minor positive effect in relation to SA objective 1: health and wellbeing.</p> <p>Site 59827 has been appraised as a residential site and so it receives a negligible effect in relation to SA objective 4: economic growth. As stated in the proforma for the site "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA, the site assessment criteria will be updated so that if a residential site contains an existing business that could potentially be lost as a result of development, it receives a minor negative effect.</p>
43779649	Q8	<p>Site Identification Number: 59709</p> <p>Berkeley has some concerns with the ISAR scorings given to this site as explained below.</p> <p>SA Objective 2: The outcome of objective 2 is accepted. Berkeley strongly believes that access to community facilities and services will be improved post development of the site. Two primary schools are located less than 1km from the site, in addition to a secondary school being located approximately 1.8km from the land at Dark Hill Farm.</p> <p>SA Objective 5: Berkeley would ask the council to reconsider the assessment of objective 5 (to protect and enhance biodiversity and geodiversity) as uncertain significant negative. The site's definition as a green infrastructure asset is questionable given the limited public access to it. While Berkeley appreciates the site lies within close proximity to a Local Wildlife Site, it is not within 250m of one or more internationally or nationally designated sites. Development will be unlikely to cause disruption to the Local Wildlife Site.</p> <p>Berkeley endeavours to achieve 10% net-biodiversity gain on all projects and the land at Dark Hill Farm is no exception. There is an</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of Bourne Valley Woods Local Wildlife Site and Ancient Woodland. The site also contains existing green infrastructure assets (thick vegetation).</p> <p>Although development of this site offers the opportunity to achieve biodiversity net gain, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is located within the North Downs AONB.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>opportunity as part of the development to retain, enhance and create areas of green space on site and will do so with the upmost respect for the current landscape setting. It is incorrect to assume that development will worsen the surrounding natural environment and not enhance it.</p> <p>SA Objective 6: Berkeley disagrees with regard to scoring the site with an uncertain significant negative for objective 6 – to protect and enhance the borough's landscape and townscape character and quality.</p> <p>Greater certainty about the impacts of development on the landscape is provided by landscape assessment work undertaken by Murdoch Wickham Associates for Berkeley. The analysis explains that the land comprises paddocks with areas of scrub and derelict farm buildings. The characteristics of the site are not typical of the wooded, traditional farmed landscape associated with the Greensand Ridge within the Kent Downs AONB.</p> <p>Residential development on the western fringes of Borough Green is visible in views to the site and other urbanising influences including traffic noise associated mainly with the A25 and the nearby residential development in the former quarry site to the south west further detract from the site's contribution to the AONB.</p> <p>Overall, the site has a relatively high degree of visual enclosure, in particular the fields north of the footpath, which runs across the centre of the site. The northern hedge provides an effective screen between the site and the A25. There are potential views to the land from the west in the vicinity of Oldbury Hill, but this is a densely wooded area, and no viewpoints were identified.</p> <p>The site does not share the dominant characteristics of the Kent Downs AONB. The site serves a much lower function in comparison to the wider area and the land contributes little to the AONB designation. It is concluded that the development of the Dark Hill Farm site would have a negligible impact on the AONB.</p> <p>SA Objective 7: the scoring the site with an uncertain significant negative for objective 7 due to the site's proximity (being within 250m) to a heritage asset requires further analysis.</p> <p>The site does not contain any designated or non-designated heritage assets. Furthermore, there are no listed buildings directly adjacent to the site. The Borough Green conservation area is located on the eastern side of the town and as such would not be impacted.</p> <p>The site is located approximately 135m from the closest heritage asset in Borough Green, with further Grade II listed buildings, found an additional 20m eastward and still within the urban confines of Borough Green. Ightham Court, a Grade II* listed building (Registered Park and Gardens designation) is located approximately 750m from the site north-westward.</p> <p>There is limited or no intervisibility between the site and the nearby heritage assets. The land at Dark Hill Farm will have a negligible impact on any of the surrounding heritage assets and it is incorrect to</p>	<p>With regard to SA objective 7: heritage, the site is recorded as containing Neolithic finds, in addition to falling within 250m of a number of heritage assets. Therefore, it receives a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertain significant negative effect is as a result of the site containing land with a 1 in 30 year risk of surface water flooding. Further to this, there is some overlap with a watercourse in the north west of the site and therefore it is uncertain what effect development might have on the watercourse in terms of water quality.</p> <p>With regard to SA objective 9: soils, the site receives an uncertain significant negative effect because it comprises Grade 3 agricultural land but it is unknown whether it is Grade 3a (high quality) or 3b (not classified as high quality) agricultural land. The criteria for this objective are considered robust but in the next iteration of the SA Report, will be amended to take into consideration the Post 1988 Agricultural Land Classification (ALC). The Post 1988 ALC can sometimes provide further information on the quality of agricultural land, but only covers specific areas of the borough.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>score the site with an uncertain significant negative, purely based on proximity.</p> <p>SA Objective 8 - The SA assesses the site, in line with objective 8 criteria, to have a 'significant negative' impact on enhancing the quality of water features and resources. The assessment states the site to be either entirely or significantly (i.e. >25%) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding.</p> <p>While a proportion of the western boundary is part of Flood Zone 3, it is not in excess of 25% of the site. In fact, much less than 25% of the site resides in Flood Zone 3 as this only affects a small area on the western site boundary.</p> <p>Surface water flooding is also determined to affect more than 25% of the site, alongside the land being associated with a 1 in 30-year risk of surface water flooding. It is evident that only a small proportion of the northern parcel is prone to surface water flooding.</p> <p>Surface water flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures (SuDS) within the design proposal.</p> <p>Overall, whilst there is some flood risk on site, which is accepted, this has the potential to be avoided or suitably mitigated. This means that the impact would be negligible.</p> <p>SA Objective 9 - The SA assessment of objective 9 ranks the site as an uncertain significant negative. An agricultural land classification survey will need to be undertaken to determine whether the Option Land is Grade 3a (best and most versatile) or Grade 3b (not best and most versatile). However, either way this should not prejudice the assessment of suitability, as the site is not currently in productive agricultural use and realistically is not of a size of which it could function efficiently as a piece of agricultural land to be commercially farmed.</p>	
42452545	Q8	<p>We have undertaken a review of the Interim SA site assessment for Coblands Nursery - site reference 59746.</p> <p>It is understood that the scoring applied to the site is based on computer modelling which should be a starting point but does not provide sufficient detail.</p> <p>We have provided a finer grain assessment of the scoring for site reference 59746 which has adjusted scoring for human health/wellbeing, biodiversity, landscape character, heritage impact and mineral impact. This is presented with the benefit of a more refined review, taking account of the specific location and impact of development.</p> <p>A response has been provided under Comment ID 31 to the SA Annex 1 consultation but please see attached and submitted document titled Interim SA review - site 59746.</p>	<p>The site appraisals have been generated by GIS, using the site assessment criteria presented in Appendix D of the Interim SA Report.</p> <p>We have responded to the estimated yield provided by TMBC, which was generated using a methodology agreed by the Council and applied to all sites.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an open space (Waveney Road Woods) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>In the next iteration of the SA Report, Trenchwood Medical Centre will be added and all sites affected updated.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is recorded as having an uncertain significant negative effect because it is located within 250m of an area of ancient woodland, which is also considered a green infrastructure asset. Development of the site could therefore have an adverse effect on this asset. The site is also recorded as containing a green infrastructure asset.</p> <p>The site is incorrectly recorded as containing an open space against SA objective 6: landscape and townscape. In the next iteration of the SA Report the site will not be identified as containing an open space.</p> <p>The site is also incorrectly recorded as not being located near any settlements, even though it borders Tonbridge. In the next iteration of the SA Report, the assessment will be updated to reflect this.</p> <p>With regard to SA objective 7: heritage, the site has been appraised in line with the site assessment criteria.</p> <p>With regard to SA objective 8: water, the site is recorded as having an uncertain significant negative effect because it is within an area with a 1 in 30 year risk of surface water flooding. Further to this, it contains a water body. As such, the site is potentially at risk of polluting the water contained within this water body. Although the respondent has stated that water quality will be protected, this is a 'policy-off' appraisal of the site and therefore mitigation is not taken into account. This ensures all sites are appraised consistently.</p> <p>With regard to SA objective 13: material assets, the justification text for the uncertain minor negative effect explains that the effect is uncertain at it will largely depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>Any development of the Site would avoid locating built form which would affect flood storage such a land raising on land within flood zone 2 and 3. The site lies outside of the SPZ Zone 1, 2 and 3, but lies adjacent to a watercourse (Hilden Brook). During construction, protection of water quality will be carefully managed and monitored.</p>
45325537	Q8	<p>While we endorse that site ref. 59682 (Land South Of Church Lane) scores more favourably against other sites promoted for development at East Peckham, Snoll Hatch and Hale Street, we do not agree with the assessment of the Site at Appendix D of the SA for the reasons explained below.</p> <p>We consider that this Site has a greater potential to score more positively than the 'Minor Negative' scored with regard to SA2 'improving equality and access to community facilities and services'. This is because the site is sustainably located in proximity to the facilities and services available at East Peckham, which are all accessible via foot, cycle or bus. In addition, we would highlight that the Site is currently subject to a planning application (ref. 21/03353/FL) that includes a new community facility, designed specifically to</p>	<p>Site 59682 receives a minor negative effect in relation to SA objective 2: services and facilities, as it falls within the Fair Accessibility Band and the methodology for which is set out in the Urban Capacity Study (July 2022). This is in accordance with the site assessment criteria. The SA acknowledges under SA objective 10: climate change mitigation that although the site is more than 800m of a railway station, it is within 400m of a bus stop.</p> <p>Although the respondent notes that the site is subject to a planning application that includes a new community facility, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. provision of a community facility). The SA is too high-level to give consideration to individual planning applications for sites, and giving consideration to supporting documents would result in not all sites being appraised on a consistent basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>provide accommodation for providers delivering health care for older people as well as preserving WWII heritage assets such as a Pillbox.</p> <p>With regards to SA5, we consider that the site has the potential to score more positively than an 'uncertain minor negative' and certainly should not be scored any worse than a 'minor negative'. This is because while we acknowledge the SA does not take into account the potential for landscape mitigation, we would highlight the current planning application for the Site demonstrates how a scheme could be progressed that sensitively responds to its landscape context. This can be achieved via the sensitive placement of development, retention and incorporation of key landscaping feature and mitigation measures within the Site including native tree planting. This is evident from the Landscaping scheme submitted to support the planning application at Church Lane. The Landscaping scheme provides a landscape strategy comprising the retention of the existing hedgerows and trees that border the Site and those which currently divide the two parcels of land. The proposal will also add generous buffer zones to the edges of the Site. The Site will also provide good areas of public open space. The public open space will provide new landscaping such as wildflower and grass meadows.</p> <p>SA6 relates to the character and appearance of streetscapes of development in relation to existing settlements, particularly how new development should enhance or reflect the existing pattern of development. We consider that the Site has potential to score more positively than 'uncertain minor negative', and certainly should not be scored any worse than a 'minor negative'. This is because, the SA does not consider the potential for mitigation, the current planning application has demonstrated a way in which a development could be progressed at the site provide a range of typologies, building heights and streetscapes reflective of the mixed character of the settlements of Hale Street and East Peckham.</p> <p>SA9 relates to the conservation and enhancement of soil resources and the guarding against land contamination. SA9 scores the site as a 'Significant Negative'. We do not agree with how the Site has been assessed, as the Site has been incorrectly identified as Grade 1 agricultural land. However, the Agricultural Land Classification Report (Appendix C) submitted in support of the planning application at Land South of Church Lane identifies that all East Peckham and the surrounding land is covered by Grade 2-3 agricultural land. We believe the score for SA9 should be scored as a 'Minor Negative' in light of the above.</p> <p>In addition, at 3.2ha of BMV land, the proposals would not represent "significant development" of agricultural land in NPPF terms as the site falls well below the guideline figure of 20ha in order to constitute "significant development". Accordingly, the loss of the site would comply with the NPPF (para 174) in terms of the loss of BMV.</p> <p>SA10 relates to reducing greenhouse gas emissions to minimise climate change. The Site was scored a minor positive. We endorse this score given to the Site from TMBC.</p>	<p>SA objective 5: biodiversity and geodiversity does not cover landscape, which is covered separately under SA objective 6: landscape and townscape. Site 59682 receives an uncertain minor negative effect in relation to SA objective 6 as it is located on the edge of a settlement and so there's potential for it to be more easily integrated into existing built development, compared to more rural and isolated sites. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. a landscaping scheme). All adverse effects against this objective are recorded as uncertain, as the actual effects are dependent on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The site receives a significant negative effect against SA objective 9: soil, as it is greenfield and comprises Grade 2 agricultural land. The SA looks at whether sites comprise best and most versatile agricultural land, not whether proposals would or would not represent significant development on best and most versatile agricultural land.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>The Site was assessed as a 'Minor Positive' against SA14, which relates to providing a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures. The submitted planning application clearly shows that through the efficient use of the Site the land has capacity to deliver 69 residential units towards the 839dpa Standard Method target for the Borough if the allocation were to come forward. The Site is therefore, considered to be a medium size which could be delivered in the first few years of the Plan period. We consider that this would provide more than a minor positive benefit. Thus, the score should be upgraded to 'Positive'.</p> <p>Indeed, we would highlight that Site 59682 scored sufficiently highly in the SA for the previous draft Local Plan to support the proposed released of the Site from the Green Belt in that draft local plan and its allocation for residential development under draft Policy LP25 (t) and (v).</p> <p>With regard to Site 59782 we endorse TMBCs assessment in the interim SA.</p>	
25406913	Q8	<p>Within Annex 1: Reasonable alternative development site options of the Sustainability Appraisal there are some important factual inaccuracies which skew the assessment of our submitted sites. We set out below the corrected facts. Due to word limits, the full response is also submitted under the SA Annex 1 section of the consultation.</p> <p>Site 59825: Land north of Back Lane, Shipbourne (5 Acre Field) SA states: "The Site is within an area of open space or currently accommodates a sports facility and this may be lost as a result of development" Correction: There is no public access to this site, it is private land owned by the Fairlawne Estate. There are no public footpaths crossing the site nor are there any sports facilities to be lost. SA states: "The Site includes employment development smaller than 5ha in size." Correction: This is not applicable given only residential development is proposed and there are no existing employment uses on the site. Site 59823: Oast Lane, Tonbridge SA states: "The Site is located in the Fair Accessibility Band". Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilities in the Town, the site must logically be placed in a higher accessibility zone. The SA states: "The Site includes employment development smaller than 5ha in size." Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. The SA states: "The site contains an existing green infrastructure asset that could be lost as a result of new development". Correction: The site contains no green</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, site 59825 is incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Shipbourne Common) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA Report, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>Sites 59825, 59823 and 59821 have been appraised as mixed use sites. The positive effects these sites are expected to have in relation to SA objective 4: economic growth are as a result of the fact these sites would include employment development.</p> <p>Site 59825 will be reappraised as a residential only site in the next iteration of the SA.</p> <p>Sites 59823 and 59821 are identified as falling within the Fair Accessibility Band. Site 59804 is recorded as falling within the Good Accessibility Band and site 59801 is recorded as falling within the Poor Accessibility Band. This information has fed into the SA.</p> <p>Site 59823 does contain an existing green infrastructure asset in the form of a line of woodland/thick vegetation to its east.</p> <p>With regards to SA objective 8: water, sites 59823, 59779 and 59801 receive a mixed significant negative and negligible effect. The significant negative effect is as a result of the sites falling within an</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>infrastructure asset, adjoins the built-up edge of Tonbridge, is not a designated open space and has no public access. SA states: "The Site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources. SA states: "The Site is within a Minerals Safeguarding Area". Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within any minerals safeguarding area. Site 59821: Oast Lane, Tonbridge SA states: "The Site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development." Correction: The site is not a designated open space, has no public access and does not accommodate a sports facility. SA states: "The Site is placed in the Fair Accessibility Band." Correction: The site should be within the Very Good or Excellent accessibility band. The Site is on the edge of Tonbridge which is identified as a Regional Hub and one of the most sustainable locations within the District. The site lies within 1km of an existing bus stop and within walking distance to a number of services and facilities including a convenience store, school and various cafes and shops. The main SA report indicates that in addition to accessibility to local services, sites have also been assessed on their location, with sites in settlements placing higher in the settlement hierarchy being considered more accessible generally. Given the site's position on the edge of Tonbridge and the broad range of services and facilitates in the Town, the site must logically be placed in a higher accessibility zone. SA states: "The site includes employment development more than 5ha in size." Correction: The site is only proposed for housing and supporting infrastructure. It does not include employment development. SA states: "The Site is not located near to any settlements in rural locations." Correction: The statement is nonsensical. The site adjoins the built-up edge of the principal urban area of Tonbridge. A highly sustainable location. SA states: "The Site is either entirely or significantly (i.e. >=25%) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding." Correction: On the basis of the Environment Agency's flood map for planning, the site is entirely outside Flood Zone 3 and is wholly within Flood Zone 1. Therefore, the site should score highly on the basis of SA Objective 8: To protect and enhance the quality of water features and resources SA states: "The site is within a Minerals Safeguarding Area." Correction: On the basis of the Kent Minerals and Waste Local Plan 2013-2030 the site is not within a minerals safeguarding area (it is in close proximity). Site 59778: Allotment Site, The Street, Plaxtol SA states: "The site is within an area of open space or currently accommodates an outdoor sports facility and this use may be lost as a result of development." Correction: The Site does not accommodate outdoor sports facilities; however it does include a private allotment site. The land which accommodates the allotments is wholly owned by</p>	<p>area with a 1 in 30 year risk of surface water flooding. The negligible effect is as a result of the sites not containing a water body or watercourse or falling within a Source Protection Zone. Sites 59821 and 59804 receive an uncertain significant negative effect. This is because site 59821 falls within an area with a 1 in 30 year risk of surface water flooding and partially falls within Source Protection Zone 2. Site 59804 falls within an area with a 1 in 30 year risk of surface water flooding, in addition to containing a watercourse and slightly overlapping Source Protection Zone 3.</p> <p>Sites 59823, 59821 and 59801 are identified as falling within a Minerals Safeguarding Area. Therefore, they receive an uncertain minor negative effect in relation to SA objective 13: material assets.</p> <p>With regard to SA objective 1: health and wellbeing, site 59821 is also incorrectly recorded as containing an open space. The reason the site is recorded as containing an open space is that it slightly overlaps an existing open space (Tonbridge Farm Sportsground) and so the GIS analysis identified the site as containing an open space. In the next iteration of the SA, the GIS analysis will be refined so that sites that slightly overlap an open space are not picked up as containing that open space. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1.</p> <p>With regard to SA objective 6: landscape and townscape, sites 59821 and 59823 are recorded as having significant negative effects in relation to this objective. In the next iteration of the SA, these effects will be upgraded to minor negative effects. This is because the GIS analysis identified some sites as not located near any settlements in a rural location when they are in fact on the edge of a settlement, as there was no percentage overlap with the settlement boundaries.</p> <p>It is correct that site 59778 receives uncertain significant negative effect in relation to SA objective 1: health and wellbeing, as it contains an open space in the form of allotments. Although the respondent notes that the land which accommodates the allotments (owned by the Fairlawne Estate) could be retained or relocated, these are 'policy-off' appraisals of the sites that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis. The uncertain significant negative effect is mixed with a minor positive effect,</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the SA acknowledges that site 59779 is within 250m of Ancient Woodland through the sentence "The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites". LUC acknowledge that this sentence does not explicitly refer to Ancient Woodland, even though Ancient Woodland was included in the GIS analysis. In the next iteration of the SA, the sentence will be revised to state "The site is within 250m of one or more internationally or nationally designated biodiversity sites, geodiversity sites or Ancient Woodland". The SA also now acknowledges that the site is within 250m of Shipbourne Common Local Wildlife Site.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		the Fairlawne Estate and the allotments could be retained or relocated if required. Commentary on other FECL sites continued in SA response due to word limit restrictions	<p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Although the respondent has raised the point that the site is located on the edge of a hamlet, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct. In the next iteration of the SA Report, we will add this limitation to the 'Difficulties and Data Limitations' section of the SA..</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not state that site 59779 comprises open space.</p> <p>However, site 59804 does contain an open space, as acknowledged in the SA. Frogbridge Wood is located in its north eastern corner.</p> <p>As only a small percentage of site 59804 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, we will refine the GIS analysis so that sites where there is very little overlap with existing settlements are still recorded as bordering those settlements. However, the effect will remain the same, as the site contains an open space that could be lost as a result of development.</p> <p>With regard to SA objective 7: historic environment, site 59801 is located within 250m of a heritage asset (Horns Lodge), as recorded in the Kent Historic Environment Record.</p> <p>As only a small percentage of site 59801 overlaps the settlement of Tonbridge, the GIS analysis does not identify it as adjoining the settlement of Tonbridge. In the next iteration of the SA, the site will receive an uncertain minor negative effect in relation to SA objective 6: landscape and townscape.</p>
42716289	Q8	<p>Assessments too generic and not reviewed in enough detail</p> <p>Site no 59850 - East Street, Addington The assessment is far too generic This site is clearly unsuitable :-</p> <p>Green-belt land</p> <p>Protected OS1a land as shown in TMBC strategy policy</p> <p>75m away from Area of outstanding natural beauty</p> <p>Size of site would double size of Addington Village</p> <p>No schools close by</p> <p>Infrastructure is already busy for a village</p> <p>Important open space - current golf course</p> <p>Public rights of way with beautiful open views</p> <p>Loss of amenity value for the village</p> <p>Wildlife habitat - newts, bats, dormice, badgers, slow worms, important birds</p>	<p>The site has been appraised to a level considered appropriate. The SA does not determine whether a site can be considered suitable or not, but rather provides an objective assessment of its sustainability.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The Interim SA Report provides an appraisal of different options that the Council is considering for the emerging Local Plan. Consideration is not given in SA to existing policies in adopted Local Plans.</p> <p>The SA acknowledges the site's proximity in relation to the AONB, and so it receives a significant negative effect in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes depends on the design, scale and layout of development.</p> <p>The SA also acknowledges that the site is not within 800m of an existing primary or secondary school. For this reason, the site</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Overdevelopment likely</p> <p>No special circumstance could ever arise that would mean development would be a better option in this instance.</p>	<p>receives an uncertain minor negative effect in relation to SA objective 3: education.</p> <p>The SA also acknowledges the fact the site comprises the West Malling Golf Course, under SA objective 1: health and wellbeing. For this reason, the site receives an uncertain significant negative effect (as part of a mixed effect) in relation to SA1.</p> <p>The SA also acknowledges the fact the site contains a green infrastructure asset and is within close proximity of other biodiversity assets. For this reason, it receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p>
42376993	Q8	<p>WPC welcomes the amendment made to table 9 of the local plan consultation document that links the SA reports, site references and site plans. However, it is noted that Appendix D of the Interim Sustainability Appraisal Report relates to site assessment criteria and not to individual site assessments suggested by this question. Has this question been incorrectly drafted, when it should in fact refer to Table 1.6 (residential site options) in the Interim Sustainability Appraisal Report: Non-technical summary, and crossed referenced to Annex 1 of the Interim Sustainability Appraisal Report (site plans)?</p>	<p>Question 8 of the consultation was "Do you agree with the findings of the individual site assessments in Annex 1 of the Interim Sustainability Appraisal? Yes/No Please explain and quote the individual site reference number".</p> <p>Table 16 in the Non-Technical Summary presents the findings of the residential site options. This table is also presented in the Interim SA Report, in Table 5.1.</p> <p>Annex 1 of the Interim SA Report provides a proforma for each site appraised in the SA, whilst Appendix D of the Interim SA Report presents the site assessment criteria.</p>
42765537	Q8	<p>Annex 1 is not referenced on the index of the Interim Sustainability Appraisal Report, so this is question must be excluded.</p>	<p>Annex 1 is not listed on the Contents page of the Interim SA Report. However, it was published on the website as part of the Regulation 18 consultation. In the next iteration of the SA Report, the Annex will be added to the Contents page.</p>
42514977	Q8	<p>Appendix D (non technical summary) seems to outline the objectives not assess the sites. It is only Annex 1 that gives detail for sites. The criteria used are not of equal importance and so it is difficult to give weight to conflicting criteria. Less and more focussed and weighted criteria would have been better.</p> <p>The approach taken seems to have been to include any area of land that might be developed irrespective of practical suitability. This is disappointing and means that we are obliged to review a mass of unsuitable detail.</p> <p>As examples sites 59709, 59720, 59793, 59872 and 59871 vary greatly in size, but the estimated housing is only identified as ',100' or 100+'. This tells us very little to make a detailed comment.</p> <p>However, no consideration is given to existing pressures on infrastructure - a huge weakness of the analysis. e.g. medical facilities available - but already very busy, especially at peak times. School exists but few available places - and only a primary school close. My confidence that the required investment would be made is very low.</p> <p>Road network is not identified as a bottleneck but with larger developments would be a nightmare, eg 59709, 59720. Village would</p>	<p>The purpose of the SA is to assess all reasonable alternative development site options, as identified by TMBC.</p> <p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		effectively be joined up with the Borough Green urban area. Larger developments should be rejected in small village environments unless there is a very good reason, with supporting infrastructure.	
42255521	Q8	Appendix D related to objective and not individual sites. Unless the question is asking for something different. I would expect there to be a map etc with noted locales on it.	Appendix D presents the site assessment criteria. The individual site appraisals can be found in Annex 1 of the Interim SA Report, and the findings summarised in Chapter 5 of the Interim SA Report.
42616641	Q8	Generally agree on site assessments. But for site 59811, disagree that is positive on Objective 1 (Improve human wealth and well being). It is within 800 metres of a footpath, but not open space or healthcare facility and is inappropriate in respect of 2262 homes in view of appalling access off existing single track road (Matthews Lane)	Site 59811 receives a minor positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of at least one publicly accessible open space and a walking path.
39036065	Q8	Site 59740 Broadwater Farm Due to the character limit on responses via this platform I have submitted my full answer to this question via email. Overall I believe the TMBC's published evaluation of this site against the Sustainability Assessment Objectives, although not particularly positive, actually understates the negatives and over-states the positives for many Objectives. This area is rich in heritage, cultural, landscape, community and farming assets. Areas of the site are protected by Listed Building status, Conservation Area status, KCC Ancient Monument guidance and Quiet Lane designations. The farmland of the site is also, overall, better quality than "best and most versatile". TMBC are in possession of a robust bank of data to suggest this site is unsuitable for large scale developments and I believe this site should not go forward in the Local Plan process.	The SA utilises a precautionary approach in its appraisal of the Regulation 18 Local Plan. Site 59740 is recorded in the SA as having a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. Site 59740 is also recorded as having a significant negative effect in relation to SA objective 9: soil, as it comprises best and most versatile agricultural land. Please refer to the proforma for this site, which presents the effects it is likely to have in relation to each of the SA objectives
42376993	Q8	WPC welcomes the amendment made to table 9 of the local plan consultation document that links the SA reports, site references and site plans. However, it is noted that Appendix D of the Interim Sustainability Appraisal Report relates to site assessment criteria and not to individual site assessments suggested by this question. Has this question been incorrectly drafted, when it should in fact refer to Table 1.6 (residential site options) in the Interim Sustainability Appraisal Report: Non-technical summary, and cross referenced to Annex 1 of the Interim Sustainability Appraisal Report (site plans)?	Question 8 of the consultation was "Do you agree with the findings of the individual site assessments in Annex 1 of the Interim Sustainability Appraisal? Yes/No Please explain and quote the individual site reference number". Table 16 in the Non-Technical Summary presents the findings of the residential site options. This table is also presented in the Interim SA Report, in Table 5.1. Annex 1 of the Interim SA Report provides a proforma for each site appraised in the SA, whilst Appendix D of the Interim SA Report presents the site assessment criteria.
24925793	Q8 of the questionnaire	No. In our opinion, the scoring for some of the Objectives is questionable*, especially for sites in south-west Tonbridge. It also does not seem to reflect the potential negative impacts of the developments, given the infrastructure/highway capacity and air quality issues**, in our local area. Our initial abbreviated comments, for each of the locally listed development sites, are as follows. □ Sites 59550 & 59552 (Brindle's Field playground) – the loss of open space/recreational areas, which are locally valuable (so should be listed as Local Green Spaces – see Q.34), reduces access to recreational opportunities and local community facilities (like play areas). As such, the scoring should be negative for both SA1 and SA2	All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report. Sites 59550, 59552, 59571 and 59572 are recorded as having uncertain significant negative effects in relation to SA objective 1: health and wellbeing, due to the fact they contain an open space that could be lost as a result of development, although this is uncertain.

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>(not "--?/+", or "0"). Also, given the current lack of local primary school places* and the additional cumulative demand from other granted developments (inc. Site 59869: 125 houses), then SA3 should be slightly negative.</p> <p>□ Sites 59571 & 59572 (nr Milton Gardens) – the loss of open green spaces in residential areas again reduces access to recreational opportunities and so is detrimental to Objective SA1, which seeks to promote health/wellbeing. As such, SA1 should have a negative score (not "-- ?/+"). Again, given the current lack of local primary school places*, SA3 should be slightly negative. In addition, Site 59572 provides a buffer, minimising the landscape harm (SA6).</p> <p>□ Site 59641 (land adjoining Lower Haysden, on east side) – generally has the lowest Objective scores, than most other sites, so is least likely to deliver sustainable development and should not be taken forward. Furthermore, with reference to SA6 that rightly acknowledges the “significant negative impact”, but the justification for this being “uncertain” (i.e. "--?") is questionable on balance. Firstly, as the justification text incorrectly states that “The site is not located near any settlements in rural locations”, but this site adjoins the rural hamlet of Lower Haysden and so the scoring may have underestimated the impact. Secondly, having such a disproportionate amount of development, compared to existing hamlet, will cause significant harm (i.e. "--") to the character of this rural Conversation Area. Thirdly, such disproportionate development in this rural location is likely to cause significant harm to the landscape setting of the ANOB (<500m, as noted in L.P. Para. 5.21.92) and the surrounding countryside, regardless of it’s design, especially given the flat open farmland. Lastly, this Green Belt site provides an important buffer to preserve the separate identity of Lower Haysden and prevent coalescence with the Tonbridge urban confines. As noted below (in Q.11, as stated by TMBC1) a minimum of 500m is required as an effective Green Belt buffer, but this loss green field buffer (at the western-edge) could be compounded by development within the eastern-half of this small Green Belt buffer. For instance, if Site 59764 was taken forward, then Tonbridge would come within 200m of this site and Lower Haysden.</p> <p>□ Site 59695 (Lower Haysden Ln. south side, eastern land parcel) – as above, given the current lack of local primary school places*, SA3 should be negative; in view of the large number of new homes proposed, on top of the other granted developments (inc. Site 59869: 125 homes). This site will also have a “significant impact” on the landscape setting of the AONB, which overlooks this site, as acknowledged in the SA6 justification text. However, given the lack of natural screening along southern-boundary of the site, compared to the trees that screen the edge of the existing town confines, it is likely that any development here (regardless of it’s design, scale) would probably have a more certain detrimental landscape setting impact. Note to maintain an minimum effective Green Belt buffer of 500m (as per TMBC1), between Tonbridge and Lower Haysden, either this site or Site 59641 cannot be taken forward.</p>	<p>The effects are coupled with a minor positive effects, as both sites are within 800m of other areas of open space, as well as walking paths.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Although site 59869 was included in the previous Draft Local Plan and was going to provide a new primary school, this is not the current baseline against which the Local Plan is being appraised. Site 59868 correctly receives an uncertain significant positive effect in relation to SA objective 3, as it is within close proximity of a primary school and a secondary school.</p> <p>Site 59572 receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is within 500m of the AONB.</p> <p>All adverse effects against SA objective 6: landscape and townscape are recorded as uncertain, as the actual effects will also depend on the final design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>As outlined in the site assessment criteria in Appendix D of the Interim SA Report, sites receive an uncertain significant negative effect against SA objective 6: landscape and townscape when they are not located near any settlements. Although the respondent has raised the point that sites 59641 is located on the edge of Lower Haysden, sites adjacent to small hamlets without defined boundaries are defined as being located within the countryside. The effect recorded for the site is therefore correct (it should receive a significant negative effect). In the next iteration of the SA, we will add this limitation to the section entitled 'Difficulties and Data Limitations'. Site 59641, in addition to site 59869 are not located within 500m of the AONB.</p> <p>Site 59695 is incorrectly recorded as not located near any settlements in a rural location when it is in fact on the edge of a settlement. This is as a result of the percentage overlap between the site and settlement boundaries. In the next iteration of the SA Report, the effect will remain the same, as the site is located within 500m of the AONB. As mentioned already, all adverse effects against this objective are recorded as uncertain.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>□ Site 59764 (Lower Haysden Ln. south side, western land parcel) – as above, given the current lack of local primary school places*, SA3 should be negative; in view the even larger number of new homes proposed here, on top of the other granted developments (59869: 125 homes). Similarly, to Site 59695, this has a more certain “significant impact” on the landscape setting of the AONB, given the lack of natural screening. The scoring may also have underestimated the impact (i.e. “---”), given that the justification text incorrectly states that “The site is not located near any settlements in rural locations”, but this site is within 500m of rural Lower Haysden. Moreover, this site is located midway into the small Green Belt buffer that separates Tonbridge’s urban confines from the separate hamlet of Lower Haysden. As such, it would render this vital Green Belt buffer ineffective (<500m1), with the edge of the town extending to within 200m of Lower Haysden and would be contrary to its purpose to prevent coalescence.</p> <p>□ Site 59869 (Lower Haysden Ln. north side) – in the previous Draft Local Plan, this site had provision for a new primary school, which is needed, given the current lack of local primary school places*. However, the omission of new primary school at this site and increase in the proposed number of new houses (now 125), will put more pressure on local school places, together with the demand from other new housing sites (e.g. West [now North] Kent College). As such, development here without the proposed school should have SA3 negative score. On the basis that the site is over-looked by the AONB, which is 500m of the site, and given the potential “significant impact” on the landscape setting, robust policies need to be adopted for this site, to limit the visual impact; e.g. houses limited to 2-storeys, as noted below (see Q.19).</p> <p>*For instance, for Objective SA3, the justification text for the above-mentioned sites acknowledges the positive scorings (“++?”) “depends on there being capacity available at those [school] facilities” and “residential development could stimulate the provision of new schools”. However, as noted above there is a current lack of local primary school places and KCC withdrew support for a new primary school, which was meant to be delivered as part of the new housing development at Site 59869. As such, given the lack of local school places in south-west Tonbridge, it would surely be better to focus development closer where there are other schools in the town have more capacity. Otherwise, it will result in more private car trips and congestion on local roads, as parents have to take their children to the other side of town. This cannot be considered to be consistent with sustainable development, so a fairer score reflecting the lack of local places would be a “+?” or “-”. Furthermore, as advocated in Q.11, we need to adopt an ‘infrastructure first’ approach to ensure that the much-needed local school spaces will be provided, to support sustainable development, before building more houses in this part of Tonbridge; as KCC could still refuse a new local school. **There are other local infrastructure issues, in south-west Tonbridge, such as insufficient highways capacity. For instance, the at the Brook Street/Quarry Hill junction is operating above practical capacity</p>	<p>The SA is too high-level to consider highways capacity but the Council will commission additional evidence on matters including traffic.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		(>95%), as acknowledged by KCC Highways, even before Site 59869 was granted outline planning permission for 125 new houses. However, since this application was approved, other plans have been granted, including at the Judd School for an extended sixth from entry and a possible Haysebrook School extension that will generate more peak-time traffic on Brook Street. As such, this junction would likely to have cope with something like 120% of it's capacity, even without any further development in this part of town. As noted in Q.21, there limited room in which to widen the junction, to provide capacity, so further development is likely to cause a severe cumulative impact and congestion. This would likely worsen the local air quality (incl. the High St). Note local cycle-way improvements will not address car use, given the lack of local school places. Also, there is a lack of sewer capacity, with insufficient connections to this part of town. As such, further development within south-west Tonbridge could increase the local flooding and risks the site deliverability/viability, which are key considerations in determining exceptional circumstances.	
43309729	Q8 of the questionnaire	<p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.33 In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we agree with the positive assessment with strategic objective 1 and the benefits that the housing will deliver. However, there are a number of inaccuracies as a consequence of not properly addressing the site in detail.</p> <p>1.2.34 In our view there are no landscape, heritage or flood reasons to prohibit development. The site is inherently appreciated in a residential context and is well-related to day-to-day services and amenities within the settlement of Borough Green, identified as a rural service centre.</p> <p>1.2.35 The site is located approximately 150m east of the Kent Downs Area of Outstanding Natural Beauty ('AONB') boundary. Nonetheless, by virtue of the topography of the area and intervening built form and mature woodland vegetation, the application site is visually and spatially unrelated from the AONB and is very limited in its visibility from public vantage points within the AONB. Consequently, the site is limited in its potential to impact upon the setting of the AONB.</p> <p>1.2.36 Considering wider environmental constraints, the site itself is not identified to be any of any particular ecological or alternative landscape value, however land immediately to the south is identified as a Local Wildlife Site 'South Bourne Valley Woods'.</p> <p>1.2.37 In terms of flood risk, the site area falls within Flood Zone 1 (least likely zone to flood) and comprises a site of <1 hectare. Consequently, the submission of a Flood Risk Assessment is not required.</p> <p>1.2.38 Considering heritage matters, the application site does not contain any heritage assets and there are no Listed Buildings, Scheduled Monuments or Conservation Area within the site locality.</p>	<p>Site 59767 receives a significant negative effect in relation to SA objective 6: landscape and townscape, as it is within 500m of the AONB. All effects against SA objective 6 are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. The SA acknowledges that the site is adjacent to the settlement (uncertain minor negative effect) but because it is within 500m of the AONB, the significant negative effect overrides the minor negative effect. The SA is too high-level to consider topography and vegetation is covered separately under SA objective 5: biodiversity and geodiversity.</p> <p>The site receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it partially falls within Bourne Valley Woods Local Wildlife Site and is within 250m of Ancient Woodland. All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The site receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. Further to this, it contains a watercourse. The effect is recorded as uncertain, as it is unknown what effect development might have on water quality.</p> <p>The site receives an uncertain significant negative effect in relation to SA objective 7: heritage because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. The effect is recorded as uncertain, as the actual effect will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA is too high-level to consider site-specific access points.</p>

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		<p>1.2.39 Vehicular and pedestrian access is achieved via an existing access route from the adjacent roundabout between Quarry Hill Road / Thong Lane / Hazelbourne Avenue (serving Isles Quarry West 'allocations policy H2' / Dark Hill Road. The access spur currently serves Borough Green Medical Practice, Reynolds Health Spa & Retreat and nine residential dwellings adjacent to the site. Public Right of Way 'MR310' runs to the east of the site but would not be impacted by the proposed development</p> <p>1.2.40 Consequently, the SA requires a more detailed assessment of the site constraints if it is to inform credible decisions.</p>	
43485985	Q8 of the questionnaire	<p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>1.2.29 In respect of this question, our client only wishes to comment upon the site they are promoting.</p> <p>1.2.30 With respect to site 59705 we support the positive that will be achieved in respect of the provision of new job opportunities (Objective 4) and in particular we would reiterate that a shortfall of 147,550 sq.m light/general industrial and storage and distribution requirements across the period 2021-40, which our client's land has a role in helping to address.</p> <p>1.2.31 However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>1.2.32 For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. Provision of employment uses with dedicated species rich features would result in substantial betterment and this should represent a strong positive.</p> <p>1.2.33 Based on a human judgement it is clear that there are not any significant heritage, environmental or landscape constraints to development and that the impacts are likely to be neutral or positive. Furthermore, the land is well related to the established employment hub of Wrotham.</p> <p>1.2.34 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.</p>	<p>SA utilises a precautionary approach. Delivering growth beyond the assessed housing need could result in some capacity issues, whilst also stimulating the provision of new services and facilities. This is acknowledged in the Interim SA Report.</p> <p>Site 59705 is incorrectly recorded as having an uncertain significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as there is some overlap with green infrastructure assets and so the GIS picked it up as containing green infrastructure. In the next iteration of the SA Report, the site will be recorded as having an uncertain minor negative effect in relation to SA objective 5. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>All sites are appraised on a 'policy-off' basis, meaning consideration is not given to mitigation. This ensures all sites are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59705 is correctly recorded as having an uncertain significant negative effect in relation to SA objective 7: heritage, as it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59705 is correctly recorded as having an uncertain significant negative effect in relation to SA objective 6: landscape and townscape, as it is within 500m of the AONB. All adverse effects against this objective are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p>
43545921	Q8 of the questionnaire	<p>Question 8: Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number.</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in</p>

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		<p>In respect of the TMBC Interim SA Report Objectives, we would like to make the following comments/corrections to the Council's consideration and appraisal of the individual land parcels which we have submitted to the initial Call for Sites (February 2022). These comments need to be taken into account by TMBC as they reflect the current position and therefore could fundamentally change the Council's consideration of the sites as potential future development opportunities, feeding into the emerging Local Plan. Accordingly, the additional information should be used to inform and review the appraisal of the individual or cumulative land parcels. We have also prepared GANT programmes for each land parcel to further assist and inform the Council's consideration of the deliverability of the submitted sites.</p> <p>In addition, following recent discussions with TMBC Planning Policy Officers, we have been specifically asked to provide further details on each submitted land parcel, identifying:</p> <ul style="list-style-type: none"> • The landowner • The lawful planning use of the site • Whether the site is deliverable (0-5 years) • Whether the site is developable (6 -10 years) • The development capacity of the site • The proposed use(s) of the site • The development agent/party 	<p>relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>
43676929	Q8 of the questionnaire	<p>Q8 Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report?</p> <p>1.2.29 In respect of this question, our client only wishes to comment upon the site they are promoting- (i.e. site 59855)</p> <ul style="list-style-type: none"> • SA Objective 1: To improve human health and well-being <p>The SA scores the site as minor positive. Whilst this isn't contested, it should be noted that in the context of an employment site, this is considered less relevant in respect of the merits of the site as other objectives.</p> <ul style="list-style-type: none"> • SA Objective 2: To improve equality and access to community facilities and services <p>The site lies within the Council's Fair Accessibility Band and is therefore scored as minor negative. This is not considered to be representative of the site's accessibility having regard to its context as a proposed industrial employment allocation for the following reasons:</p> <ul style="list-style-type: none"> - The scoring methodology as set out in the Urban Capacity Study is geared heavily towards assessing potential residential sites and not directly suited to employment sites (particularly industrial). For example, weighting is given to distance to healthcare facilities is the same whether a site is being assessed for residential or employment uses. That is not to say that proximity to healthcare facilities isn't of 	<p>With regard to SA objective 1: health and wellbeing, this is noted. As set out in the site assessment criteria contained in Appendix D of the Interim SA Report, "It is assumed that people would make use of healthcare facilities near to their homes rather than their workplaces. However, proximity to open spaces, walking and cycle paths, recreation and sports facilities will provide employees access to these types of features around their working hours and access to walking and cycle routes may present opportunities to travel to work using active travel".</p> <p>With regard to SA objective 2: services and facilities, this is informed by the Urban Capacity Study (July 2022). As outlined in paragraph D.3 of the Interim SA Report, "Sites have been assessed by TMBC for accessibility to local services (including transport infrastructure, education facilities, healthcare facilities and essential services) using accessible walking distances informed, in part, by guidance such as Planning for Walking [See reference 53]. Sites have also been assessed on their location, with sites within settlements placing higher in the settlement hierarchy being considered more accessible. Sites have then been given an overall accessibility score, and placed in to one of the following bands outlined in Table D.1 below".</p> <p>Although the Urban Capacity Study focusses on housing , the location of employment sites to community facilities and services is still</p>

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		<p>any relevance, but alternative weighting should be applied dependant on the uses being promoted.</p> <p>- It is not clear if the site has been scored based on a Rural Service Centre location or Other Rural Settlements location. Whilst the site lies directly adjacent to Hale Street (Other Rural Settlements), it lies very close to East Peckham and in the context of the proposed strategic employment allocation relates as much to the Rural Service Centre setting.</p> <p>- The scoring does not account for how a scale of development promoted could add to the sustainability of the site in terms of the potential to provide additional shuttle bus services to Paddock Wood and its very regular mainline train service and wide range of services and facilities. Please refer to the accompanying Transport Note (Appendix 1) for more details.</p> <ul style="list-style-type: none"> • SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society <p>N/A</p> <ul style="list-style-type: none"> • SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough <p>The site scores significant positive and minor positive based on its location relative to a train station. This does not factor in the potential for dedicated shuttle bus services to the site given the scale of development proposed. There would be no impacts upon any internationally or nationally designated biodiversity or geodiversity sites, or a locally designated site.</p> <ul style="list-style-type: none"> • SA Objective 5: To protect and enhance biodiversity and geodiversity <p>The site scores as uncertain. The intended design approach for the site is to include structural landscaping and maximise opportunities for biodiversity gains and enhancement. Accordingly, whilst it is agreed that at this formative stage of any design development effects are uncertain, it is not considered likely that they could amount to significant negative.</p> <ul style="list-style-type: none"> • SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality <p>The site is not located within any landscape designation and is marked by existing development to the west and south and a main A road to the east and north. The SA scores the site as uncertain significant negative on the basis that "the site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces". This is factually incorrect as it will not result in the loss of any designated open space and is located on the edge of a settlement. The potential negative effects are therefore overstated.</p> <ul style="list-style-type: none"> • SA Objective 7: To protect and enhance the cultural heritage resource 	<p>considered relevant as people may make use of those facilities and services near to their workplaces around working hours.</p> <p>With regard to SA objective 4: economic growth, the site receives a minor positive effect, as it is within 400m of a bus stop. The sites have been appraised on a 'policy-off' basis and so consideration is not given to mitigation (e.g. provision of a dedicated shuttle bus service).</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives an uncertain significant negative effect. The site is incorrectly recorded as containing a green infrastructure asset. Therefore, in the next iteration of the SA Report, the site will receive an uncertain minor negative effect. This is due to the fact the site is within 250m and 1km of a number of Local Wildlife Sites.</p> <p>Site 59855 incorrectly receives an uncertain significant negative effect in relation to SA objective 6: landscape and townscape. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect. This is due to the fact the site is on the edge of the settlement and development on the edge of settlements can more easily be integrated into existing development. All adverse effects against this objective are recorded as uncertain, as actual effects on landscapes and townscapes are dependent on the design, scale and layout of development, which may help mitigate adverse effects.</p> <p>With regard to SA objective 7: heritage, the sites have been appraised on a 'policy-off' basis and so consideration is not given to mitigation. Therefore, the appraisal of this site does not take into consideration how harm may be mitigated. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site has been appraised on a 'policy-off' basis and so consideration is not given to mitigation on supporting documents submitted by site promoters. This ensures all sites are appraised to a consistent level of detail.</p> <p>With regard to SA objective 9: soil, consideration cannot be given to additional documents submitted by the site promoter. This ensure all sites are appraised consistently.</p> <p>With regard to SA objective 10: climate change mitigation, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. improved linkages with Paddock Wood and its train service). This ensures all sites are appraised consistently.</p> <p>With regard to SA objective 13: material assets and waste, the site is correctly identified as falling within a Minerals Safeguarding Area. Therefore, the uncertain minor negative effect against this objective is correct.</p> <p>The SA does include an objective relating to employment provision, see SA objective 4: economic growth.</p> <p>SA is a desk-based, strategic assessment and all reasonable alternative development site options have been appraised on a</p>

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		<p>Based on the SA assessment and scoring criteria, the noted Uncertain significant negative effect is correct, however this does not account for the nature of the heritage asset in question and whether development of the site would actually likely lead to any impact on its significance. In this regard, the site lies close to a listed building but any impacts will be capable of mitigation through sensitive design and layout.</p> <ul style="list-style-type: none"> • SA Objective 8: To protect and enhance the quality of water features and resources <p>Please refer to the attached drainage note (Appendix 2). The site falls part within Flood Zone 1, part Flood Zone 2 and part Flood Zone 3 with a high risk of surface water flooding along and close to the existing watercourse along the site's northern boundary. Away from the watercourse, the risk reduces with most of the site having a low risk of surface water flooding. As a less vulnerable use is proposed, development is appropriate on this site and an exception test would not need to be applied. In the event of more vulnerable uses being provided, these would be located within the area of the site that is within Flood Zone 1.</p> <p>The drainage note sets out the principles that will be followed for sustainable surface water drainage, which will ensure run-off to the pre-developed greenfield rate and avoid any increased risk of flooding off site.</p> <p>Any development would be subject to the sequential test, which the Local Plan allocation process will in effect perform. It can be seen that the majority of the site has low surface water flood risk and that the site can be developed in a way which would not increase the risk of flooding elsewhere. The proposed uses are suitable as a matter of principle based on the flood risk profile of the site and accordingly, it is not considered that significant negative effects would occur.</p> <ul style="list-style-type: none"> • SA Objective 9: To conserve and enhance soil resources and guard against land contamination <p>The SA notes a significant negative effect as "the site is greenfield land and contains a significant proportion ($\geq 25\%$) of Grade 1 and/or 2 agricultural land". This assessment is assumed to be based on high-level mapping and so a more bespoke Agricultural Land Quality Assessment (Appendix 3) is provided here, based on available survey data. This identifies that the majority of the site is in fact Subgrade 3a land, having coarser textures and/or gravel at shallower depths. The scoring system set out in the SA provides wide-ranging bands that do not allow for more detailed comparative assessment of sites and their agricultural land value. Given that the lower grade 3a is predominant across the site, the SA scoring is considered to overstate the potential effects.</p> <ul style="list-style-type: none"> • SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change <p>As with objective 4 (see above), the scoring does not account for the potential to provide improved linkages with Paddock Wood and its train service.</p>	<p>'policy-off' basis. This means they are appraised on their physical constraints only and not mitigation or supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail.</p>

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		<ul style="list-style-type: none"> • SA Objective 11: To improve adaptation to climate change so as to minimise its impact <p>N/A, although it is intended that any development of the site would strive to deliver highly sustainable design.</p> <ul style="list-style-type: none"> • SA Objective 12: To protect and improve air quality <p>No comment</p> <ul style="list-style-type: none"> • SA Objective 13: To protect material assets and minimise waste <p>Having reverted to the Kent Minerals and Waste Local Plan, it does not appear that the site is materially affected by a Minerals Safeguarding Area (see image below – picture quality is best available online via Kent County Council's website)</p> <p>[image inserted]</p> <p>The image shows East Peckham and Hale Street – although the large scale makes it difficult to draw any definitive conclusions, it appears that the northern boundary and would not therefore materially impact the proposed allocation site or its developable area. The uncertain minor negative impact noted in the SA is therefore overstated.</p> <ul style="list-style-type: none"> • SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures <p>N/A – although it is notable that the SA does not include an objective relating to the mix of employment premises and ability to meet employment needs. Given the scale of the site and its location, it is well suited to providing a range of premises type and size, including a high proportion of smaller units that would help meet more localised need in addition to broader Borough-wide needs.</p> <p>1.2.30 The desktop nature of the site assessment is also of concern and more detailed assessment will be required, having regard to the supporting technical assessments now available and the case for the site with regard to the wider economic development strategy for the Borough.</p> <p>1.2.31 In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information. As the comments above demonstrate, the SA appraisal of site 59855 is simplistic in the methodology that is deployed, which in turn is not best suited to considering employment sites and as a result largely overstates the potential effects of future development of the site.</p>	
39036065	Q8 of the questionnaire	<p>[Site reference 59740]</p> <p>o Question 8, Site 59740.</p> <p>[redacted]</p> <p>[address redacted]</p> <p>Comments:</p> <p>Having reviewed this TMBC's site assessment against the Sustainability Assessment Objectives (SAOs), it appears that this site</p>	<p>With regard to SA objective 1: health and wellbeing, the 'Difficulties and Data Limitations' section of the SA states that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore, actual walking distances could be greater. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). Site 59740 is incorrectly recorded as containing an open space due to the fact it overlaps with an existing area of open space. In the next iteration of</p>

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		<p>does not score well at all. However I believe that even though this is the case, the "positives" are still overstated and some of the "negatives" are underplayed in the Local Plan documentation as follows:</p> <p>SAO 1: Rating Should be “Significant negative” as not all of the site is within easy reach of a healthcare facility and anyway the existing facility is already under performing. An assessment of the subobjectives also supports a negative ratings:</p> <p>Promotion of health lifestyles Area currently openly accessible including Quiet Lanes and Rural Footpath, development would only harm this.</p> <p>Antisocial Behaviour Experience from Kings Hill shows an increase in antisocial behaviour in large developments, not a decrease.</p> <p>Safe by Design Current access via the Quiet Lanes encourages safe road usage, if you add in traffic associated with another c.900homes, outcomes will be worse.</p> <p>SAO 2: I agree with the “Minor negative” rating as there is no evidence that yet another large scale commercially-led development would help alleviate the T&M housing affordability crisis and, experience from Kings Hill shows that road traffic just gets worse and any measures to get people out of their cars have limited, if any, success.</p> <p>SAO 3: I disagree with the rating which I believe should be “Negligible” based on current educational provision and the lack of information relating to any site proposals.</p> <p>SAO 4: I strongly disagree with TMBC’s assessment against this criteria of “Significant positive” and believe it should be “Uncertain minor positive” at most; very little information is presented to support TMBC’s rating. Less than 5% of the site is proposed for business development and, although some land will be within 800m of West Malling station, there is no information about what would actually be proposed for this area. The commuter traffic into Kings Hill in the morning, and leaving again in the evening, shows that proximity to a train station does not discourage car travel. In the real world people who can, drive to work. Also, the facts that so much of the originally planned business zoning for Kings Hill has been reallocated for housing and that so many units remained empty for so long around Liberty Square respectively show that planned business development will not necessarily pan out as envisaged and that the commercial rent charged for such new developments prices out small players, adding to the argument that “significant positive” is probably, on balance, not achievable.</p> <p>SAO 5: I believe the rating for this should be “Significant Negative” with no uncertainty. TMBC are in possession of a wealth of information regarding the rich biodiversity of this area, not least from Consultees and Residents regarding the application TM/21/02719. I believe this site would definitely score poorly against the following subobjectives:</p>	<p>the SA Report, the site will receive a minor positive effect only in relation to this objective.</p> <p>SA objective 2: services and facilities is informed by the Urban Capacity Study (July 2022). As such, the site correctly receives a minor negative effect in relation to this objective, as it is placed within the Fair Accessibility Band in the Urban Capacity Study. This is in accordance with the site assessment criteria (please refer to Appendix D of the interim SA Report). Housing affordability is dealt with separately under SA objective 14: housing. The SA is too high-level to consider traffic levels and so the Council will commission additional evidence on matters including traffic.</p> <p>Site 59740 receives an uncertain minor positive effect in relation to SA objective 3: education, as it is within 800m of a primary school. All effects against this objective are recorded as uncertain, as "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Site 59740 is proposed for mixed-use development and therefore receives a significant positive effect in relation to SA objective 4: economic growth, as it will provide new employment opportunities.</p> <p>With regard to SA objective 5: biodiversity, all effects against this objective are recorded as uncertain for the reasons outlined in the site assessment criteria (Appendix D of the Interim SA Report). The site receives an uncertain significant negative effect.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as being in a rural location and not within close proximity of any settlements when it is on the edge of a settlement. Therefore, in the next iteration of the SA Report, it will receive an uncertain minor negative effect in relation to this objective. As outlined in the site assessment criteria "Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites". All adverse effects against this objective are recorded as uncertain, as actual effects are dependent on the design, scale and layout of development, which may help mitigate any adverse effects. The historic environment is dealt with separately under SA objective 7: heritage.</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 7: heritage, all effects against this objective are recorded as uncertain for the reasons outlined in the site assessment criteria (Appendix D). The site receives an uncertain significant negative effect.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>To protect and enhance designated sites of nature conservation importance</p> <p>Harm would be caused to the New Barns & Broadwater Farm Conservation Area.</p> <p>To protect and enhance wildlife especially rare and endangered species. Harm would be caused as the site as a whole provides habitats for both resident and migratory, red-listed species</p> <p>To protect and enhance habitats and wildlife corridor Any development of this site would damage habitats not “protect and enhance”.</p> <p>To provide opportunities for people to access wildlife and open green spaces. Any development would restrict existing opportunities.</p> <p>To increase biodiversity net gain. This site currently provides a range of rich wildlife habitats, including meadows, orchards, hedgerows and wooded areas, no information is provided which would support an increase in biodiversity net gain.</p> <p>To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline. Development of this area would not protect and enhance priority species</p> <p>To protect, enhance and expand ecological networks and their interconnectivity. There is no current evidence to support the achievement of this objection, in fact the opposite is apparent.</p> <p>To protect and enhance sites designated for geodiversity. The Broadwater area is an area of geological interest, highlighted by the area’s names such as “Broadwater” and “Well Street”, which would neither be protected nor enhanced by development.</p> <p>SAO 6: I believe the rating should be “Significant Negative” with no uncertainty. TMBC are in possession of a significant bank of information about this site, including information from the consultation exercise associated with TM/21/02719. The landscape character and quality is formed from an unique mix of natural features (rolling open vistas, the Cwylla which is an historic Anglo Saxon monument) and important historic buildings, many of them both Listed and protected by their positions within Conservation Areas. TMBC itself designated the New Barns and Broadwater Farm Conservation Area in 1993, in part, due to the quality of views into, out of and across the area between the New Barns hamlet and the Broadwater Farmstead with substantial oast house complexes at either side. The typically Kentish view would definitely be harmed by further development. I believe this site scores poorly against the subobjectives as follows:</p> <p>To protect and enhance landscape character and quality ,given the nature of the landscape & its current protections, development would only cause harm and not protect.</p> <p>Protect and enhance the integrity and quality of the borough’s urban and rural landscapes, maintaining local distinctiveness and sense of</p>	<p>With regard to SA objective 8: water, the significant negative effect is recorded as uncertain as the site contains a water body but it is unknown what effect development might have on water quality. The site receives a significant negative effect, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people’s behaviour.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, all adverse effects are recorded as uncertain as they largely depend on factors such as whether they would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.</p> <p>With regard to SA objective 14: housing, all mixed-use sites are expected to have significant positive or minor positive effects in relation to this objective, depending on their size. If a site provides 100 dwellings or more, it receives a significant positive effect and if it provides fewer than 100 dwellings, it receives a minor positive effect. All positive effects against this objective are recorded as uncertain for mixed-use sites, as it is uncertain how much of each site will be used for residential development as opposed to other uses.</p> <p>The respondent does not disagree with the findings of the SA with regard to SA objectives 9: soil and 11: climate change adaptation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>place. I believe this subobjective to be of particular importance as, not only is the rural landscape “distinct”, it is also unique containing the only instance of a “Cwylla” and is encompassed by a network of ancient sunken roads or hollow ways which are designated now as “Quiet Lanes”.</p> <p>To protect and enhance AONBs within the borough and their settings further development would harm the settings of the Kent Downs AONB.</p> <p>SAO 7: I believe the rating should be “Significant Negative” with no uncertainty. As above, TMBC are in possession of a significant bank of information about this site, including information from the consultation exercise associated with TM/21/02719. The area currently enjoys various statutory protections through its many listed buildings and Conservation Areas. Additionally, I believe the site scores poorly against the following subobjectives:</p> <p>To protect and enhance historic buildings and sites Within this area are numerous listed buildings including The Barracks and Derbies on Well Street, East Malling which are Grade2* listed. Such assets would neither be protected nor enhanced by development.</p> <p>To protect and enhance historic landscape/townscape value.</p> <p>With reference to the local Conservation Areas in particular, the historic landscape is currently protected. For New Barns and Broadwater, its Conservation Area designation and the associated visual amenity would undoubtedly be significantly harmed through further development.</p> <p>Cultural Heritage the cultural significance of the area reflects not only the hop farming heritage which endures through the proliferation of oast buildings across the site, but also goes back to the English Civil War and beyond a thousand years to the Anglo Saxon period.</p> <p>SAO 8: I believe the rating should be “Significant Negative” with no uncertainty. The Hydrogeology report commissioned by the Broadwater Action Group and submitted to TMBC during the consultation for application TN/21/02719 provides robust data regarding the existence of aquifers across this site which importantly feed the ancient Cwylla, contribute greatly to the productivity of Broadwater Farm and also give rise to what becomes the Ditton Stream which actually rises at Well Street. Development of this area would cause damage to these water features. (The information submitted by the applicant and the consultee response about this area from the Environment Agency is incomplete and should not be relied on.) I believe this site scores poorly against the following subobjectives:</p> <p>To protect and enhance ground and surface water quality.</p> <p>The Broadwater area is, as the name confirms, rich in ground and surface water resources which development would neither protect nor enhance.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Reduce the risk of flooding to existing communities and ensure no new developments are at risk. I am very concerned that any development mitigation would lead to serious harm to the Anglo Saxon Cwylla, which, is a KCC listed monument. Mitigation would also affect the water which has been accessible to the historic properties of Well Street and Broadwater Road. The water flow to the Ditton Stream would be impacted also. The New Barns Oast complex to the west of the New Barns Hamlet is situated in a hollow and would be at risk of flooding from any development to the south which interrupted the natural surface water drainage flows.</p> <p>To protect and enhance water quantity, such as through high standards of water efficiency.</p> <p>Any development would risk the water flowing to the Ditton Stream..</p> <p>SAO 9: I agree that a rating of "Significant Negative" is appropriate for this SA Objective as it is a greenfield site of 49% Grade 1 & 2 soil with 100% of the soil being Grade 3 or above, i.e. overall the soil quality is better than the threshold for "Best and Most Versatile". To support my rating for this SA, comments on the subobjectives are given below:</p> <p>To reduce the amount of derelict, contaminated, and vacant land.</p> <p>None of the land involved is of this type so this objective is not met.</p> <p>To encourage development of brownfield land where appropriate.</p> <p>Only the current farm buildings could be classified as "brownfield", possibly less than 1% of the site, so this objective is substantially unmet.</p> <p>To protect soil functions and quality.</p> <p>Developing this land would remove actively farmed land so this objective cannot be met.</p> <p>Avoid development of 'best and most versatile' soil.</p> <p>All of the farmland on the site is even better than "best and most versatile" so development should be avoided.</p> <p>SAO 10 I strongly challenge the rating of "significant positive" given by TMBC and I believe the rating should be "Minor negative" as it is difficult to see just how a 112 ha development could reduce greenhouse gas emissions overall, certainly no information is provided which would support this. The nearby Kings Hill development shows that although there are non-vehicular links to West Malling station, the car remains "king" and this is particularly noticeable during the twice daily rush hour. Developments of the proposed size of this site actively encourage families and others to relocate from higher cost areas to achieve "more house" for their money and the reality is that ICE car journeys and other fossil fuel using activities would only increase. Other than 1/3 of the site being within 800m of a railway station no information is provided to allow further analysis against the subobjectives for this SA.</p> <p>SAO 11: To improve adaptation to climate change so as to minimise its impact I was not able to find any further evidence to assess how the</p>	

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		<p>site is rated against this objective so have no reason to disagree with TMBC's assessment of Negligible.</p> <p>SA Objective 12: I believe the rating for this objective should be "Minor negative" and not "Negligible" as suggested by TMBC. I also think an AQMA for A228 from the south of Kings Hill through to Leybourne should be established due to the increase in daily traffic in recent years, which is often slow moving or stationary. Local air quality is being affected and the road noise from the A228 across large parts of the site is evidence of the prevailing winds which indicate that the traffic pollution will also be present. Any further large scale building would only increase these harmful effects. I know air quality in this area is of concern to TMBC councillors as when I listened to the Planning Committee discussions regarding application TM/18/03034/OAEA, a significant concern of the Councillors was the proximity of the proposed playground site to the A228 and the potential risk from pollution. This confirms that TMBC are aware of and are sensitive to air quality issues in the vicinity of the western portion of this site. Additionally, I would add the following in regards to the subobjective:</p> <p>To protect and improve local air quality.</p> <p>Given the site is mainly green fields, orchard, hedgerows and trees, it is difficult to see how air quality could be improved by development.</p> <p>SAO 13: A vast amount of building materials including sand would be needed to develop this site which could be sourced from local sites such as Ryarsh or Borough Green or other local sites so even if this SA does not impact on this site, it could well have a negative effect on the material assets of the borough as a whole. Consequently this SA should probably have a "Minor negative" rating rather than "Uncertain minor negative".</p> <p>SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures. As the only publicly-available information available about the possible number and mix of houses for this site comes from Berkeley Homes application TM/21/02719 for the land covered by this site, TMBC's assessment "Uncertain minor positive" does not seem unreasonable.</p>	
43781249	Q8 of the questionnaire	<p>Q.8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>Chapel Street, Ryarsh (Site 59744)</p> <p>1.3.35 In regard to SA objective 3, the SA states that the site is within 800m of an existing secondary or primary school, but that there may not be capacity for additional pupils. If there is need for additional educational provision, then this development will be required to contribute to improving that provision.</p> <p>1.3.36 Whilst the school may be currently at capacity, it is likely that its catchment area goes beyond the village and its immediate surroundings. It may well be the case that any school age children living in the development would have greater priority over other</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report state "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage" [emphasis added].</p> <p>Site 59744 has been appraised in accordance with the site assessment criteria against SA objective 6: landscape and townscape. The appraisal has been undertaken on a 'policy-off' basis and so consideration is not given to mitigation.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>applicants for those spaces, who may have alternative provision closer to their homes. The current capacity of the school should not represent a constraint to a proportionate expansion of the village.</p> <p>1.3.37 In relation to SA objective 6, whilst the site is within an AONB, it should be noted that the whole village is washed over by the AONB. This should not prevent well-designed proportionate growth of the village.</p> <p>1.3.38 SA Objective 8 incorrectly scores the site down due to being in Flood Risk zone 2. In fact, the site lies in flood zone 1, as highlighted on the map below. The score should be adjusted accordingly.</p> <p>1.3.39 Furthermore, SA objective 9 has been addressed as a 'significant negative' for the site. However, no detailed agricultural study has been carried out, and so that actual agricultural land quality is not definitively known here.</p> <p>Hermitage Court (Site 59738)</p> <p>1.3.40 In regard to SA objective 3, the site is being proposed for employment purposes, and therefore the proximity of the site to a school is not a relevant consideration. This factor has no effect on the suitability for employment purposes. The SA should differentiate residential and employment schemes and their relevance to certain factors.</p> <p>1.3.41 SA objective 6 the site is being scored as 'uncertain significant negative' on the basis that the site is said not to be located near any settlements in rural locations. It is unclear as to how this conclusion has been reached, as the site is almost adjacent to the boundary of Maidstone and has a continuous footpath from the site into the almost adjacent urban area.</p> <p>1.3.42 SA objective 9 should be highlighted. Whilst the site is greenfield land, it is not currently being used for agricultural purposes, and for this reason there would be no loss of agricultural land from developments on this site. Again, no detailed agricultural study has been carried out, and so that actual agricultural land quality is not definitively known here.</p>	<p>Site 59744 is correctly given a minor negative effect in relation to SA objective 8: water, as it contains land with a 1 in 100 year risk of surface water flooding. The proforma for the site states that the site is within Flood Zone 2 <i>and/or</i> contains land with a 1 in 100 year risk of surface water flooding.</p> <p>The Agricultural Land Classification has informed SA objective 9: soil and so the site correctly receives a significant negative effect in relation to this objective.</p> <p>As site 59738 is proposed for mixed use development which could include residential uses, it has correctly been appraised against SA objective 3: education. The SA does differentiate between different proposed uses, specifically residential, employment and mixed use. Please refer to Appendix D of the Interim SA Report, which presents the site assessment criteria for these different types of sites.</p> <p>With regard to SA objective 6: landscapes and townscapes, site 59738 is correctly recorded as not located near any settlements in a rural location. It is near Maidstone but not on the edge of Maidstone.</p> <p>With regard to SA objective 9: soil and site 59738, the Agricultural Land Classification still applies when a site is not actively being used for agricultural purposes. As mentioned already, the Agricultural Land Classification has informed SA objective 9: soil.</p>
42832833	Q8 of the questionnaire	<p>Q.8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number The Site has been assessed through the Interim Sustainability Appraisal (site reference: 59773) and there are some parts of the appraisal that we agree and support, whilst others we consider incorrect. Our comments on the relevant objectives (that we do not agree with) are outlined below.</p> <p>[formatted in table]</p> <p>Interim Sustainability Appraisal Objective Documentary Commentary Our Commentary</p>	<p>With regard to SA objective 1: health and wellbeing, the site receives a minor positive effect instead of a significant positive effect as although it is within 800m of existing areas of open space and walking paths, it is not within 800m of a GP surgery. This is in accordance with the site assessment criteria presented in Appendix D of the Interim SA Report.</p> <p>SA objective 2: services and facilities has been informed by the Urban Capacity Study (July 2022). The SA acknowledges in the site assessment criteria under SA objective 2 "The location of residential sites, as well as mixed use sites incorporating residential development, could affect this objective by influencing people's ability to access existing services and facilities, although it is noted that</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA Objective 1: To improve human health and well-being</p> <p>Minor positive (+)</p> <p>The site is within 800m of either an existing healthcare facility or an existing area of open space/ walking and cycle path / play area/ sports facility (but not both). The proposal would facilitate improved health and well-being by providing much needed housing. We therefore suggest the Site is scored ‘++’ (significant positive effect likely) rather</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>Significant negative (--)</p> <p>The site is placed within the Poor Accessibility Band. Whilst it is acknowledged that the settlement of Crouch has limited community facilities and services, in line with paragraph 79 of the NPPF, the development of the Site for housing has the potential to help improve community facilities and public transport through financial contributions and the viability of an increased population in the area. Given the above and the Council's assessment in respect of SA Objective 1 and our subsequent re-assessment, we suggest the Site is scored ‘+’ (minor positive effect likely) rather than – (significant negative effect likely).</p> <p>Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <p>Uncertain minor negative (-?)</p> <p>The site is more than 800m of an existing secondary school and a primary school. However, uncertainty exists as the effects will depend on there being capacity available at those facilities to The necessary financial contributions would be made to mitigate any likely impact of the Site in respect of education provision. We therefore suggest the Site is scored ‘0’ (Negligible effect likely) rather than (-?) Uncertain minor negative.</p> <p>TONBRIDGE & MALLING BOROUGH COUNCIL – LOCAL PLAN (REGULATION 18) CONSULTATION (NOVEMBER 2022) – LAND AT BASTED LANE, CROUCH Page 7 of 11</p> <p>accommodate new pupils. It is also noted that the provision of new residential development could stimulate the provision of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <p>Negligible (0)/Negligible (0)</p> <p>The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities The development of the Site does have the potential to influence sustainable economic growth, through the construction phase. The development of the Site is also likely to be undertaken by a SME</p>	<p>larger scale development could potentially incorporate the provision of new services" [emphasis added]. This is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>With regard to SA objective 3: education, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. contributions towards education provision). This ensures all sites are appraised on a consistent basis. All effects against this objective are recorded as uncertain due to uncertainty regarding school capacity.</p> <p>With regard to SA objective 4: economic growth, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities. Although it is noted that an SME would undertake the construction work, this is an appraisal of the site and does not take into consideration who is developing the site.</p> <p>With regard to SA objectives 5: biodiversity and geodiversity, 6: landscape and townscape and 7: heritage, again this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain and landscaping). If the site is allocated in the Local Plan via policy containing mitigation measures, it will be appraised on a 'policy-on' basis.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>builder. Further, once the dwellings are occupied, the additional local population will have a positive effect on the local economy. We therefore suggest the Site is scored '+' (minor positive effect) rather than (0) Negligible.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity Uncertain significant negative (--)</p> <p>The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites. While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In accordance with the emerging Local Plan alongside the legislation within the Environment Act, the development of the Site would need to deliver at least a 10% net gain in biodiversity. With good landscaping and design plus generous planting of native trees any biodiversity disbenefits would be easily off-set on the site. We therefore suggest the Site is scored '++' (significant positive effect likely) rather than (--) Uncertain significant negative.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality Uncertain significant negative (--)</p> <p>The site is located on the edge of a settlement. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. The site is enclosed with good opportunities for strengthening its screening along its boundaries. The site's visibility from surrounding areas is also limited so its development would have minimal impact on the area. Whilst the character of the Site would change (development of a greenfield site), with a robust landscaping strategy and careful layout, it is suggested that the long-term impact would be minimal/negligible.</p> <p>TONBRIDGE & MALLING BOROUGH COUNCIL – LOCAL PLAN (REGULATION 18) CONSULTATION (NOVEMBER 2022) – LAND AT BASTED LANE, CROUCH Page 8 of 11</p> <p>We therefore suggest the Site is scored '-' (minor negative effect) rather than (--) Uncertain significant negative.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource Uncertain significant negative (--)</p> <p>The site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. It is suggested with mitigation that would be incorporated into the development, the heritage asset and its setting (Winfield House) would not be affected. We therefore suggest the Site is scored '0' (Negligible effect likely) rather than (--) Uncertain significant negative.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		We therefore consider the Interim Sustainability Assessment Report scores for the objectives as listed above should be higher than set out within the assessment. We therefore request that the interim sustainability Appraisal for the Site is reviewed by the Council and amended in accordance with the above.	
44200193	Q8 of the questionnaire	<p>Q8. Do you agree with the findings of the individual site assessments in Appendix D of the Interim Sustainability Appraisal Report? Yes/No Please explain and quote the individual site reference number</p> <p>In respect of this question, our client only wishes to comment upon the site they are promoting. In this regard, we support the double positive that will be achieved in respect of the provision of housing. However, we believe the SA takes an overly negative stance in respect of wider objectives.</p> <p>For example, the land is currently of little or no ecological value and would need to achieve biodiversity net gain if it were to be developed. The provision of housing would therefore result in substantial betterment, and this should represent a strong positive.</p> <p>The desktop nature of the site assessment is also of concern. Based on a human judgement it is clear that there are not any significant heritage or landscape constraints to development and that the impacts are likely to be neutral or positive.</p> <p>In summary, it is essential that sites are properly appraised to ensure that decisions are made on credible information.</p>	<p>Site 59851 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity, as it contains existing green infrastructure assets, in addition to an SSSI (Holborough to Burnham Marshes), a Regionally Important Geological Site (Aylesford Pit) and Local Wildlife Site (Eccles Old Pits). All effects against SA objective 5 are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. Although the respondent has stated that the site would need to achieve biodiversity net gain, this is a 'policy-off' appraisal and so consideration is not given to things like biodiversity net gain, as this is a form of mitigation. If the site is allocated in the Local Plan via policy, it will be appraised on a 'policy-on' basis.</p> <p>With regard to the historic environment, the site receives a significant negative effect because it is within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against SA objective 7: heritage are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to the landscape, the site receives a minor negative effect in relation to SA objective 6: landscape and townscape, as it is located adjacent to a settlement. Sites located adjacent to settlements may be more easily integrated into existing built development. All effects against SA objective 6 are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is a desk-based, strategic assessment and it is therefore not possible or proportionate for the SA to explore heritage and landscape constraints in more detail.</p>
25368033	Q8 of the questionnaire	<p>I am writing to you having also completed our formal response to the 'Regulation 18' consultation using the online portal system as is the Council's preferred method of comment.</p> <p>As you are aware, the online system has been designed such that whilst it is possible in some instances to elaborate on answers to questions, a maximum of 6,000 characters can be used in each case (This equates on average to approximately 800 words).</p> <p>Whilst this is sufficient in the main, in the case of the Site Assessment responses (Question 8), it does not enable a full response to be provided.</p>	<p>The reasoning behind any uncertain effects is provided in Appendix D of the Interim SA Report.</p> <p>Site 59748 receives an uncertain significant negative effect in relation to SA objective 1: health and wellbeing (as part of a mixed effect), as it contains an existing area of open space. This open space may be lost as a result of development, although this is uncertain. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. open space provision). This ensures all sites are appraised to a consistent level of detail. The SA does acknowledge the fact site 59748 is within close proximity of a GP surgery and open space and for this reason, also receives a significant positive effect in relation to SA objective 1.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>There is similarly no facility to attach plans or drawings which can be necessary to assist in explaining the points being made.</p> <p>Whilst appreciating the reasoning behind the use of the online system, (which we have utilised), I would ask that the Council consider the following additional points in relation to our client's land at Dryland Road, Borough Green (Site Reference 59748) as in many cases the assessment summaries appear either incorrect or uncertain of the effects that would result from its development.</p> <p>We highlight a number of the main areas of concern below.</p> <p>SA Objective 1: To improve human health and well-being</p> <p>1.The Sustainability Appraisal (SA) lists the site as likely to have significant positive effects and also uncertain negative effects. We agree with the positive effects categorisation but not the reference to uncertain negative effects.</p> <p>* Paragraph 5.4 of the SA states that negative effects under this category are likely to relate to sites that contain “an area of open space or accommodate an outdoor sports facility that may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on the exact scale, layout and design of development and whether these existing features are in fact lost to new development.”</p> <p>* Our clients site is private land, it does not include any public open space or sports facilities that would be lost through development. The site proposals include the provision of new publicly accessible footpaths and open space which would result in a significant improvement in terms of access to open space in this area. An indicative site plan is included to demonstrate this provision to the south of the built development.</p> <p>* It is noted that site number 59710 (Land near the garden centre at Borough Green Road) has been ranked as a significant positive in terms of improving human health and well-being. The assessment states that this is because the site lies within 800m of an existing healthcare facility and an area of open space/play area/sports facility. Our client site lies close to a bowling club, (50m) and a recreation ground (100m) and within easy walking distance of the Borough Green Medical Centre (260m) but these aspects are not referenced in the text in the same way.</p> <p>* The attached context and facilities plan demonstrated the ease of access to nearby local facilities including the medical centre.</p> <p>* We ask that the reference to uncertain negative effects is therefore removed from the assessment.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>* The site is noted as having ‘fair’ accessibility to facilities and services. The SA notes that “Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing</p>	<p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). As the site falls within the Fair Accessibility Band in the Urban Capacity Study, it receives a minor negative effect in relation to SA objective 2. The straight-line distances the respondent refers to are used to inform SA objectives 1: health and wellbeing and 3: education. The site's access to walking paths is recognised under SA objective 1. The site's proximity to a railway station (and bus stops) is considered under SA 10: climate change mitigation, and schools under SA objective 3.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59748 contains green infrastructure assets. Additionally, it is adjacent to Ancient Woodland (Bourne Valley Woods). In the next iteration of the SA Report, the proforma for this site will be amended to clearly refer to Ancient Woodland (Ancient Woodland is covered by nationally designated sites in the Interim SA Report). Therefore, the site correctly receives an uncertain significant negative effect in relation to SA objective 5. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. biodiversity net gain).</p> <p>Site 59748 is correctly recorded as being within 250m of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, the site correctly receives an uncertain significant negative effect in relation to SA objective 7: heritage.</p> <p>With regard to SA objective 8: water, the proforma for the site states that it is within Flood Zone 3 <i>and/or</i> within an area with a 1 in 30 year risk of surface water flooding. In this instance, the site is within an area with a 1 in 30 year risk of surface water flooding. Therefore, the site is correctly recorded as receiving a significant negative effect.</p> <p>It is important to note that that SA is one of many factors that feed into the plan-making process.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>services and facilities, and therefore actual walking distances could be greater."</p> <p>* Given the above there is clearly potential for sites to score well based on a straight line distance whilst in reality, due to inaccessible third party land and the locations of footpaths to key facilities, to perform far more poorly in reality. Our client's site 59748 has the ability to link directly to existing footpaths and so access services directly and easily. The site similarly has the potential to deliver new links across and through it and so improve accessibility for new and existing residents. Please see the indicative site plan attached.</p> <p>* Notwithstanding this, if straight line distances are to be used, the accompanying facilities plan demonstrates that the site lies within a reasonable walking distance of the following:</p> <ul style="list-style-type: none"> * Bowling Green - 50 metres * Sports Ground - 100 metres * Medical centre - 260 metres * Bus Stop - 380 metres * Public House - 400 metres * High Street (Various Shops) - 450 metres * Primary School - 550 metres * Railway Station - 700 metres * Secondary School - 1000 metres <p>* The site sustainability credentials were noted as part of the previous 2016 call for sites process where the Council's summary assessment report concluded:</p> <p>"In terms of access to services, this site is in a sustainable location, adjacent to the built-up confines of Borough Green"</p> <p>* The overall assessment was that the site should be categorised as 'green' and so considered "suitable and deliverable".</p> <p>* Given the above we do not agree that the site accessibility should be considered as only 'fair' under this category, it is clearly very well related to shops and facilities and so offers a highly sustainable option for new development.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>* The appraisal assesses the site as having "uncertain significant negative" effects. The associated text states:</p> <p>"The site is within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites.....</p> <p>The site contains an existing green infrastructure asset that could be lost as a result of development. The effect is uncertain as it may be possible to conserve or even enhance the asset through design and layout of the new development."</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>* This is incorrect. The DEFRA 'Magic' Map confirms that the site is approximately 1km away from the Bourne Alder Carr SSSI and over 310m from the Kent Downs AONB. No other sites are highlighted.</p> <p>* The site should be considered to have a neutral impact on this basis not uncertain negative as currently listed.</p> <p>* In terms of the reference to the site containing a "green infrastructure asset", it is noted that the site is all private agricultural land. It is not publicly accessible. Notwithstanding this, as part of the sites development it is proposed to deliver a significant biodiversity net gain. This has been assessed by Corylus Ecology Consultants in this regard. In summary, the whole of the site comprises 7.6834ha with 2.5ha shown as holding potential for development of approximately 45 – 50 new homes directly adjoining the settlement edge. This leaves 5.1516ha of wider land remaining.</p> <p>* It is proposed that 3ha is designated as a biodiversity net gain area to provide 20% net gain for another site within the district. A further area is capable of providing at least 30% biodiversity net gain for the site, along with general amenity open space, footpaths and walking routes as indicated on the accompanying site plan.</p> <p>* This aspect of the assessment should be updated to note the site as having a significant positive effect i.e. delivering a biodiversity net gain well beyond standard policy requirements.</p> <p>SA Objective 7: To protect and enhance the cultural heritage resource</p> <p>* The SA suggests "uncertain significant negative" effects under this category on the basis that the site lies within 250 metres of a heritage asset.</p> <p>* Having reviewed the heritage mapping system provided by Historic England it is understood that the closet asset is Hunts Farmhouse (grade II) which is approximately 230m away at No.77 Maidstone Road.</p> <p>* There are a number of intervening buildings, the bowls club and a large playing field between the site and this property. It is very clear that development at our client's site would have absolutely no impact upon the setting of the farmhouse.</p> <p>* This assessment should be amended to confirm that there would be no negative impact and the site should be ranked as at least neutral in this respect.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>* The appraisal highlights the site as falling with a range of from "significant negative to uncertain minor negative effects".</p> <p>* The text suggests that up to 25% of the site may be located in Flood Zone 3.</p> <p>* This is incorrect.</p>	

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		<p>* The flood map for planning (below) demonstrates that Flood Zone 3 only touches the far northern edge of the site. The site itself is not at risk from flooding.</p> <p>* The accompanying plan demonstrates that the development would be retained south of the Flood Zone 3 area.</p> <p>* The assessment should be amended to remove any negative scoring associated with the site in respect of flood risk. This should be a neutral category.</p> <p>[map showing flood zone 3 included]</p> <p>Conclusions</p> <p>* The weight that may be attributed to the site assessment scores which are currently set out in the SA Appraisal when determining potential allocations for the plan period is unclear.</p> <p>* If the site assessments are to form the basis of and the evidence base for these decisions it is respectfully submitted that it is important that they are accurate and fair.</p> <p>* This submission with reference to the accompany plans seeks to ensure that the Council has accurate information regarding our client's Dryland Road site.</p> <p>* We trust that this will be taken into account and the current inaccuracies corrected as part of the Council's further assessment of the submitted sites.</p> <p>[site layout and site context documents also included]</p>	
43629217	General	<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA).</p> <p>Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>The Council should ensure that the results of the SA process conducted through the preparation of the Local Plan clearly justify the policy choice made, including proposed site allocations (or decisions not to allocate sites) when considered against reasonable alternatives. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected.</p> <p>The SA must demonstrate that a comprehensive testing of options has been undertaken and that it provides evidence and reasoning as to why any reasonable alternatives have not been pursued. A failure to adequately give reasons in the SA could lead to a challenge of the Council's position through the examination process.</p> <p>The SA should inform plan making. Whilst exercising planning judgement on the results of the SA in the Local Plan is expected, the</p>	<p>Noted.</p> <p>SA is a high-level tool used to help identify the likely sustainability effects of a plan. It is therefore normal for the SA to include references to "potential" issues and effects.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>SA should still clearly assess any reasonable alternatives and clearly articulate the results of any such assessment.</p> <p>The Interim SA examines the Council's approaches to housing delivery, and contrasts proposed policy requirements and strategies against defined reasonable alternatives</p> <p>2 PPG ID: 61-020-20190315</p> <p>Tonbridge & Malling Local Plan Reg. 18 Representations</p> <p>6</p> <p>to confirm that the strategy outlined represents an appropriate strategy. This includes an appraisal of reasonable site options.</p> <p>Gladman's comments on the Interim Sustainability Assessment Report can be found later in this representation, at section 4.3.</p> <p>Gladman broadly agree with the findings of the strategic policy option assessments in Chapter 4 of the Interim Sustainability Appraisal Report (ISA), however, have some concerns regarding the methodology. Harm being assessed as minor or significant whilst also being a determined 'potential' suggests a nuance that has not been fully explored. It is not robust to determine the scale of a harm that may or may not occur, whilst referencing that there is the potential for mitigation. Gladman recommend the ISA is reviewed before the next round of consultation to ensure that it is clear how the conclusions have been reached. This will allow the preferred options to be suitably assessed.</p>	
42442561	General	<p>One of the Sustainability Appraisal (SA) objectives is 'to reduce greenhouse gas emissions to minimise climate change' further Development can only make matters worse,</p>	<p>It is likely that future growth will contribute to an increase in greenhouse gas emissions unless development can be designed in a way that reduces reliance on the private car and seeks to achieve net zero. This will be reflected in the cumulative effects section of the next iteration of the SA.</p>
42746209	General	<p>Some general points of concern</p> <ul style="list-style-type: none"> * Inconsistency: Some sites have been give different assessments but the commentary is exactly the same. * Access: It is stated that access to schools or public transport are within a specific distance of the designated sites but this cannot be the case for the whole area of the site. * Local knowledge: Equally, access to a school site may be via a woodland or for public transport to a bus stop with limited services – there is no way that all new residents would use these services. * Health: There is now no GP service in West Malling, the closest is Kings Hill or Leybourne. The Sustainability Objective also conflates health facilities with access to sporting facilities/playgrounds! * Highways: Sustainability Appraisal objectives do not include impact on the local road system. 	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to measuring straight-line distances from the edge of a site option, this was done using the smallest distance between a site and existing services and facilities. The SA acknowledges in the 'Difficulties and Limitations' section of the Interim SA Report that "Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater".</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However this GP surgery is now closed. In the next iteration of the SA Report, the proformas for the sites affected will be updated.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			There is considered to be a lot of crossover between access to healthcare facilities and areas of open space and sports facilities, as these can encourage more physical activity with beneficial effects on people's health. The site assessment criteria for SA objective 1: health and wellbeing are considered suitable and appropriate.
43485921	General	<p>[Site reference 59740]</p> <p>Executive Summary</p> <p>In summary, this Regulation 18 Consultation response focuses on responding to Question 8 for Site 59740 and BAG believes there is sufficient compelling evidence to exclude this site from going forward for development in the next draft of the Local Plan. Each of the fourteen Sustainability Assessment (SA) objectives and their sub-objectives have been reviewed by BAG and in many cases, based on the evidence provided in the Interim Sustainability Appraisal Annex 1 and what is known about the site, BAG does not agree with the initial assessments given by TMBC. BAG has offered its own assessment of each of the SA objectives including appropriate supporting evidence as necessary.</p> <p>Section A below gives a general overview of BAG's assessment of the suitability of the site and Section B gives an assessment of how BAG believes the Broadwater Farm site should be rated against the Sustainability Assessment objections and sub-objectives.</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated).</p> <p>The SA does acknowledge the heritage assets within 250m of the site (including within the site). For this reason, the site receives a significant negative effect in relation to SA objective 7: heritage. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>The SA also acknowledges the fact the site is greenfield land and contains a significant proportion of Grade 1 and/or 2 agricultural land. For this reason, the site receives a significant negative effect in relation to SA objective 9: soil. It is not possible to exceed Grade 1 or 2 best and most versatile agricultural land.</p> <p>This is a 'policy-off' appraisal and so the site is appraised on its physical merits only. This ensures all reasonable alternative development site options are appraised to a consistent level of detail. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>In LUC's SA, all reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 1: health and wellbeing, the site is incorrectly recorded as containing an open space and is therefore incorrectly recorded as receiving an uncertain significant negative effect in relation to this objective. In the next iteration of the SA, the site will receive a minor positive effect only in relation to SA objective 1. With regard to the respondent's point on uncertainty, if a site is recorded as containing a designated open space it receives some uncertainty, as it is unknown whether the open space will be lost or not, or integrated into development. With regard to healthcare facilities, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP).</p> <p>The sub-objectives are guide questions used when appraising policies, not sites. The site assessment criteria are instead used to appraise the sites.</p> <p>With regard to SA objective 2: services and facilities, site 59740 is recorded in the Urban Capacity Study (July 2022) as falling within the</p>

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			<p>Fair Accessibility Band and therefore receives a minor negative effect in relation to this objective.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 4: economic growth, all mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59740 is 5ha or more, it receives a significant positive effect in relation to this objective. The fact it is also within 800m of a train station also contributes to this significant positive effect.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site is already recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>With regard to SA objective 6: landscape and townscape, site 59740 is incorrectly recorded as not located near any settlements in a rural location when it adjoins the settlement of Kings Hill. In the next iteration of the SA Report, the proforma for this site will be updated to give an uncertain minor negative effect in relation to this objective. All negative effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertainty is as result of the fact the extent to which water quality is affected depends on construction techniques and the use of SuDS within the design.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p>

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			<p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). Site 59740 is not within 100m of an AQMA.</p> <p>With regard to SA objective 13: material assets and waste, the minor negative effect is recorded as uncertain as although the site is within a Minerals Safeguarding Area, the actual effect will depend on factors such as whether the site would in fact offer viable opportunities for minerals extraction.</p> <p>The respondent has not provided a reason as to why they consider the uncertain minor positive effect against SA objective 14: housing unreasonable. Site 59740 is proposed for a mix of uses but it is unknown what percentage of the site will be provided for housing, hence the uncertainty.</p>
43629217	General	<p>Site 59824- East Mallong</p> <p>Under SA Objective 6 (to protect and enhance the borough's landscape and townscape character and quality), the site is considered to have an 'Uncertain minor negative (-?)' impact. The site is located on the edge of a settlement and it is considered that these effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale, and layout of development, which may help mitigate any adverse effects.</p> <p>Gladman disagree with the assumption that development in this location will negatively affect the landscape and townscape. The development proposals for site will be thoughtfully designed to consider the scale and layout to ensure that harm to the landscape is mitigated and the townscape on the settlement's edge is improved.</p> <p>Gladman have commissioned a Landscape and Visual Impact Assessment which concludes that the proposed development is well related to the settlement of East Mallong and due to the limited visibility of the proposed development, there will be no material effect on the landscape/townscape character of the wider area. The development will form a logical extension to the settlement and, while it will be visible from the immediate surroundings, it will be seen within the context of the existing settlement edge which is already visible. Therefore, it will not appear discordant or out of character with the surrounding area.</p> <p>Tonbridge & Mallong Local Plan Reg. 18 Representations 19</p> <p>Under SA Objective 7 (to protect and enhance the cultural heritage resource), the site's impact is considered 'Uncertain significant negative (-?)' as the site is located within 250m of a heritage asset. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>	<p>All reasonable alternative development site options have been appraised on a 'policy-off' basis and so consideration has not been given to mitigation and supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites). If a site is allocated in a Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>All site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects site options are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Gladman disagree with the potential for significant negative impacts on a heritage asset. The site can be designed and delivered in a way that is sensitive to heritage and conservation considerations.</p> <p>As part of our due diligence process, Gladman have commissioned a Heritage Desk-Based Assessment by Pegasus. This report concludes that the proposed development on the site will not result in any harm to the heritage significance of the Grade II Listed office building at Invicta Works through changes to its setting.</p> <p>The site was identified as contributing to the heritage significance of the Grade II Listed Westbrook House and Grade II Listed Cobb's Hall. The site also contributes a minor amount towards the overall special heritage interests of the Mill Street East Malling Conservation Area. The report concludes that the proposed development will result a less than substantial amount of harm at the lowest end of the spectrum to the three aforementioned designated heritage assets through changes to setting.</p> <p>Under SA Objective 14 (to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types, and tenures), the site is considered to have a 'Significant positive (++)' impact. The site is expected to comprise 100 dwellings or more and it is expected that these large sites will be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs.</p> <p>Gladman agree that the provision of housing in this location should be considered a significant positive impact.</p>	
45943201	General	<p>59602 19 Houses</p> <p>Objective 3. I question whether this is within 800m of a primary or secondary school Objective 14. I question whether a positive . I don't believe the site would be a mix of tenures due to it's size.</p> <p>.Further the site is in greenbelt, countryside ,outside the confines of West Malling,loss of agricultural land.</p> <p>Development on this side of King Hill would be a further expansion of Kings Hill commenced by the Lancaster Park development and would be the commencement of development towards Offham Village. I further understand that an application for the northern part of the site was refused by TMBC in May 12.</p> <p>If allowed it would result in further traffic through Offham Village using Teston Road as a "rat run" to the M20.</p>	<p>Site 59602 is within 800m of Valley Invicta Primary School at Kings Hill. Therefore, the site correctly receives a minor positive effect in relation to SA objective 3: education, as development at this site will ensure new residents are within close proximity or a primary school. The effect is recorded as uncertain, as capacity at this school is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA acknowledges that site 59602 is outside the settlement confines of West Malling. The proforma for the site specifically states that the site is not located near any settlements in a rural location. For this reason, the site receives a significant negative effect in relation to SA objective 6. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA also acknowledges that site 59602 contains best and most versatile agricultural land. For this reason, it receives a significant negative effect in relation to SA objective 9: soil.</p>

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45943201	General	<p>59603 30 Houses</p> <p>Objective 3. I question whether rtfs is within 800m of a primary or secondary school Objective 9. As this includes 56902 in it's entirety which is classified as greenfield ,how can this site be assessed as brownfield?</p> <p>Objective 14. I question why this is a positive,I don't believe the site would give a mix of tenures, Does it double count the site it encompasses 59602?</p> <p>I make the same observations as I did in the last 3 lines concerning 59602</p>	<p>Site 59603 is within 800m of Valley Invicta Primary School at Kings Hill. Therefore, the site correctly receives a minor positive effect in relation to SA objective 3: education, as development at this site will ensure new residents are within close proximity or a primary school. The effect is recorded as uncertain, as capacity at this school is unknown.</p> <p>Site 59603 receives a minor positive effect in relation to SA objective 14: housing, as it will deliver fewer than 100 dwellings. The SA has separately appraised sites 59602 and 59603.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA acknowledges that site 59603 is outside the settlement confines of West Malling. The proforma for the site specifically states that the site is not located near any settlements in a rural location. For this reason, the site receives a significant negative effect in relation to SA objective 6. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA acknowledges that site 59603 contains a significant proportion of Grade 3 agricultural land. Therefore, it receives a significant negative effect in relation to SA objective 9: soil. The effect is recorded as uncertain, as it is unknown whether the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality) agricultural land.</p>
45943201	General	<p>59699 260 Houses</p> <p>Objective1. With the closing of the West Malling surgery the site is not within 800m of an existing health facility Objective 3. I question whether this is within 800m of a primary or secondary school.</p> <p>Objective 4, The site is not all within 400m of a bus stop, nor would all 260 households be able to use this limited bus service or cycle. It is also unclear what business opportunities this mixed used site would deliver and therefore it's impact on the local economy.</p> <p>Objective 6. This would be a significant negative as it will have a major impact on the landscape.</p> <p>Objective 10. The majority of the site is not within 400m of a bus stop and the bus service is extremely limited-it would increase car/highway movements significantly.</p> <p>Further the site is in Green Belt, countryside, outside the confines of West Malling, would increase traffic in restricted Offham Road and West Street and would be a loss of best and most versatile agricultural land. Close to conservation areas, not submitted in previous local plan.</p>	<p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated, including site 59699.</p> <p>Site 59699 is correctly recorded as within 800m of a school, namely West Malling Church of England Primary School. Therefore, it correctly receives a minor positive effect in relation to SA objective 3: education. The effect is recorded as uncertain, as capacity at this school is unknown.</p> <p>As site 59699 is located on the edge of West Malling, it receives a minor negative effect in relation to SA objective 6: landscape and townscape. This is because site options adjacent to the existing urban edge could be more easily integrated into existing built development.</p> <p>The SA correctly acknowledges site 59699 as being within 400m of a bus stop, under SA objective 10: climate change mitigation. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next</p>

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			<p>iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA also acknowledges that site 59699 contains best and most versatile agricultural land. For this reason, it receives a significant negative effect in relation to SA objective 9: soil.</p>
45943201	General	<p>59716 28 Houses</p> <p>Objective 1. Contradictory, no explanation is given. It can't be both significantly negative and significantly positive.</p> <p>Objective 10. I question whether all of the site is within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited.</p> <p>Objective 14. I question why a positive ,I don't believe the site would give a mix of tenures due to it's size.</p> <p>Further the site is in countryside, Green Belt, outside the confines of West Malling, conservation area, harm to the setting of St Leonards Tower and Malling Place, loss of agricultural land sand would cause increase of traffic in restricted Offham Road and West Street, not submitted in previous local plan.</p>	<p>In line with the site assessment criteria presented in Appendix D of the Interim SA Report, it is possible for sites to receive mixed effects against some of the SA objectives.</p> <p>Due to an error, justification text was not provided for the effect site 59716 is expected to have against SA objective 1: health and wellbeing. In the next iteration of the SA Report, the justification text will be provided.</p> <p>Site 59716 is incorrectly recorded as receiving a significant positive effect in relation to SA objective 1: health and wellbeing when it should have received a minor positive effect. This is because the GP surgeries data used to inform the Interim SA Report included West Malling GP surgery, which is now closed. The site should receive a minor positive effect because although it is not within close proximity of a GP surgery, it is within close proximity of some open spaces and walking paths.</p> <p>Site 59717 is incorrectly recorded as containing an open space and so incorrectly receives an uncertain significant negative effect in relation to SA objective 1. This is due to the fact there is some overlap with a neighbouring open space. In the next iteration of the SA Report, the site will not receive a negative effect against SA1.</p> <p>With regard to SA objective 10: climate change mitigation, the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA</p>

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			<p>Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The SA acknowledges the site as not located near any settlements in a rural location and for this reason, receives a significant negative effect in relation to SA objective 6: landscape and townscape. All effects against this objective are recorded as uncertain, as effects on landscapes and townscape will also depend on the final design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59716 received a significant negative effect in relation to SA objective 7: heritage, due to its proximity to heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59716 also receives a significant negative effect in relation to SA objective 9: soil, as it is greenfield land and contains a significant proportion of best and most versatile agricultural land.</p>
45943201	General	<p>59733 27 Houses</p> <p>Objective 9. Brownfield?</p> <p>Objective 10. Majority of site not within 400m of a bus stop. Even for those houses within the distance, the bus service is extremely limited</p> <p>Objective 14. Why is this a positive?. I don't believe the site would give a mix of tenures due to it's size.</p> <p>Further this is outside the confines of West Malling and would leave no boundary between Kings Hill and West Malling</p>	<p>Site 59733 meets the definition of brownfield land.</p> <p>With regard to SA objective 10: climate change mitigation, the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix</p>

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			<p>of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The SA acknowledges the site as not located near any settlements in a rural location and for this reason, receives a significant negative effect in relation to SA objective 6: landscape and townscape. All effects against this objective are recorded as uncertain, as effects on landscapes and townscape will also depend on the final design, scale and layout of development, which may help mitigate any adverse effects.</p>
45943201	General	<p>59406 20 Houses</p> <p>Objective 2. This should be the same as for site 59596 ie significant negative as it is immediately next door Objective 3. Stated that it is within 800m distance walking but this would be through woodland, dark at each end of a winter's day and very muddy if weather is inclement. It is also inconsistent-the site across the road [59648]is classified as a minor negative Objective9. Is this all Brownfield Land?</p> <p>Objective 14. Why is this a positive?I don't believe the site would give a mix of tenures due to it's size Further part of this site is outside the confines of Offham and within Green Belt and countryside . Planning application for 7 houses has been accepted.</p>	<p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). In the Urban Capacity Study, site 59406 is identified as falling within the Fair Accessibility Band, whilst site 59596 is identified as falling within the Poor Accessibility Band. For this reason, sites 59406 and 59596 receive minor negative and significant negative effects, respectively.</p> <p>With regard to SA objective 3: education, the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. Site 59406 is within 800m straight-line distance from the nearest school, whereas 59648 is not, hence the difference in effects.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>Site 59406 is not entirely outside of the settlement confines of Offham as defined under Policy CP13, rather some of it is within the boundary. Therefore, the site receives a negligible effect in relation to SA objective 6: landscape and townscape.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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			SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.
45943201	General	<p>59596 23 Houses</p> <p>Objective 3. Stated that it's within 800m distance walking but this would be through woodland ,dark at the end of each winter's day and very muddy if the weather is inclement.It is also inconsistent -the site across the road[59648] is classified as a minor negative Objective 14. Why is this a positive? I do not believe the site would give a mix of tenures due to it's size .</p> <p>Further the site is in the countryside outside the confines of Offham and in Green Belt. There would be a loss of agricultural land Successive applications for 15 and 7 Houses have been refused. If the development took place there would be further traffic pressure on Offham Village.</p>	<p>With regard to SA objective 3: education, the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. Site 59596 is within 800m straight-line distance from the nearest school, whereas 59648 is not, hence the difference in effects.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>Site 59596 is adjacent to the settlement confines of Offham, as defined under Policy CP13. Therefore, the site receives a minor effect in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p>
42513281	General	<p>[59694]</p> <p>1.0 INTRODUCTION AND CONTACT DETAILS</p> <p>1.1.1 AXIS, on behalf of FCC Environment, are submitting this written representation as part of the current Tonbridge and Malling Local Plan Consultation, under Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>1.1.2 The written submission relates specifically to a proposed allocation at Allington Quarry (the Site), which was referred to as 'Site ID 59694' as part of the site review and sustainability appraisal (SA) process. The Site was put forward during the original Call for Sites process undertaken by Tonbridge & Malling Borough Council (TMBC), which ended in February 2022.</p> <p>1.1.3 We feel that the assessment of the merits of the Site against the Sustainability Appraisal (SA) objectives has been undertaken using basic criteria and limited information, resulting in unduly harsh scoring against several of the SA objectives. This has resulted in the site to seemingly underperform, when in truth, development of the site presents a strong and realistic opportunity to enhance well established employment provision at a strategic location within the Borough.</p>	<p>SA objective 3: education explores the proximity of sites to schools. As site 59694 is proposed for employment uses, SA objective 3 is not relevant. Although there is potential for employment sites to offer opportunities for work experience and apprenticeships, this cannot be guaranteed.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, due to the proximity of the site to an area of Ancient Woodland and the fact it contains green infrastructure assets, it receives a significant negative effect. The effect is uncertain as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. This is a 'policy-off' appraisal and so consideration is not given to mitigation (e.g. Biodiversity Net Gain). This ensures all sites are appraised on a consistent basis. If the site is allocated in the Local Plan via policy containing site-specific mitigation measures, it will be appraised on a 'policy-on' basis. The SA does not utilise Natural England's SSSI Impact Risk Zones.</p> <p>As the site is located within a settlement, it receives a negligible effect in relation to SA objective 6: landscape and townscape. Sites do not tend to receive positive effects against landscape objectives as SA utilises a precautionary approach and it is likely that any change to the baseline would have adverse effects.</p>

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		<p>1.1.4 The purpose of this document is therefore:</p> <ul style="list-style-type: none"> □ To review the scoring against the SA framework and to highlight where new information, or a more detailed interpretation of existing information, is likely to warrant a different scoring. □ To propose new scoring against the SA framework, supported by evidence, for the Site to be considered appropriately within the aspirations of the emerging Local Plan. □ To demonstrate how the Site would support aspirations of the emerging Local Plan and is in turn supported by emerging policies. 	<p>With regard to SA objective 7: heritage, the SA utilises Kent's Historic Environment Record. Site 59694 is located within 250m of numerous heritage assets, as recorded in the Kent Historic Environment Record.</p> <p>Site 59694 receives an uncertain significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The uncertainty is due to the fact effects resulting from Source Protection Zones are uncertain. Again, this is a 'policy-off' appraisal and so consideration is not given to mitigation.</p> <p>Site 59694 comprises Grade 2 agricultural land. Therefore, it is correct that it receives a significant negative effect in relation to SA objective 9: soil. The fact the site is not connected to any current agricultural use does not change the fact it comprises agricultural land.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for each site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>Site 59694 receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste as it is within a Minerals Safeguarding Area. Although the site promoter states that the site has already undergone aggregate abstraction, this level of information is not available for most of the sites. So as to ensure consistency, all sites within a Minerals Safeguarding Area are recorded as having an uncertain minor negative effect in relation to this objective.</p> <p>SA objective 14: housing specifically relates to the delivery of housing. As the location of employment sites will not influence housing delivery, this objective is not relevant. However, the proforma incorrectly states 'TBC' under this objective. In the next iteration of the SA Report, it will state "The location of employment sites is not considered likely to affect this objective".</p> <p>It is important to note that the SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Factors such as public opinion, deliverability and conformity with national policy are also taken into account by plan-makers when selecting preferred options for a plan.</p> <p>The appraisals in Annex 1 of the Interim SA Report have been undertaken on a 'policy-off' basis, which means that the sites have been appraised on their physical constraints only. This ensures they are all appraised to a consistent level of detail. If sites are allocated in the Local Plan via policy that contains mitigation measures, the sites will be appraised on a 'policy-on' basis (i.e. taking into consideration mitigation).</p>
43779649	General	<p>(SITE REF: 59709)</p> <p>Landscape & Green Belt</p>	<p>All reasonable alternative development site options have been appraised on a 'policy-off' basis and so consideration has not been given to mitigation and supporting documents submitted by site</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Landscape analysis for the site that has been undertaken by Murdoch Wickham Associates (see Appendix 1). This explains that the land comprises paddocks with areas of scrub and derelict farm buildings the characteristics of the site do not reflect the wooded, traditional farmed landscaped which typifies the qualities associated with the Greensand Ridge within the Kent Downs AONB.</p> <p>Furthermore, the site is well-enclosed by a variation of hedgerows and shrubbery, particularly along the northern and eastern boundary. The northern boundary runs parallel to the strategic route of the A25, Borough Green Road and the natural boundary of the hedgerow, which provides a sense of enclosure and privacy, will be maintained. The site is well-related to the edge of Borough Green and is well situated to accommodate the expansion of the town. The site is more closely associated with the existing built form in Borough Green than it is with the open countryside further out to the west of the site. Whilst the southern parts of the site are identified as being of greater visual sensitivity than the more visually enclosed and flatter northern part of the site, on this basis the assessment supports the release of the site from the AONB designation as part of the Local Plan review.</p> <p>The assessment of the site against sustainability assessment objective 6 would benefit from review. We are concerned with scoring the site as an uncertain significant negative in to landscape and townscape quality.</p> <p>From the more detailed analysis we have undertaken we suggest that landscape impact would be limited and reconsideration of the score to negligible or, at worst, minor negative, to account for a degree of local impact, would be more appropriate.</p> <p>In relation to Green Belt purposes, the site makes a contribution to openness. However, it is surrounded on all sides by either existing development or roads, which form clear boundaries. As above the site is closely related to the settlement edge with urbanising influences from existing development and road infrastructure. The site's contribution to preventing urban sprawl and preventing towns from merging is limited and, following a Borough wide Green Belt Review, the land could be released without undermining the wider purposes of the Green Belt.</p>	<p>promoters. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites). If a site is allocated in a Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59709 receives a significant negative effect in relation to SA objective 6: landscape and townscape due to location within the AONB. All adverse effects against this objective are recorded as uncertain, as actual effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p>
43779649	General	<p>[Site reference 59709]</p> <p>Heritage</p> <p>The site does not contain any designated or non-designated heritage assets. Borough Green is home to numerous Grade II listed buildings, all of which are situated within the existing urban context. There are a number of heritage assets present in the wider surrounding area such as the Grade I listed Church of St Peter in Ightham, alongside two further Grade II* listed buildings residing approximately 650m south-west of the site.</p> <p>The justification of the sites low score for sustainability assessment objective 7 appears to be the proximity of the heritage assets in Borough Green. Two listed buildings, The Red Lion Public House and</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 7: heritage, the site is recorded as containing Neolithic finds, in addition to falling within 250m of a number of heritage assts. Therefore, it receives a significant negative effect in relation to this objective. The effect is recorded as uncertain, as the actual effect will depend on the final design, scale and layout of development.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>35-39 Sevenoaks Road (both Grade II listed) are situated 135m and 155m from the site's northern boundary. Despite the site's proximity to these assets, there is no intervisibility between the site and these buildings. Therefore, development of the site would not cause any harm to these designated heritage assets and the impact would be negligible.</p> <p>The site is approximately 750m south-east of a Registered Park and Gardens designation, Ightham Court (Grade II*). The A25 Borough Green Road and the railway line provide a significant barrier between the site and Ightham Court and, in view of this and the separation distance, it is also reasonable to assume a negligible impact.</p> <p>In terms of archaeology there are no statutory designations affecting the site. Further work will be undertaken to assess the site's archaeological potential prior to planning including any recommended investigations. Archaeology is not expected to be prohibitive to development.</p> <p>Ecology</p> <p>The site is not subject to any statutory or non-statutory nature designations and any ecological interest is likely to be local in terms of its importance. The edges of the fields on the site include hedgerows and there are some existing trees located on the site. Our proposal will seek to retain and enhance these landscape features thereby retaining existing habitat. Ecological surveys will be undertaken as part of a future planning application to include identifying any necessary mitigation measures required. Berkeley commits to achieving a net biodiversity gain on all its developments and so opportunities to enhance the site's ecological value will be incorporated.</p> <p>Sustainability Assessment Objective 5 scores as an uncertain significant negative due to 'the site within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites' alongside 'the site containing existing green infrastructure assets'. The site's definition as a green infrastructure asset is questionable given the limited public access to it. The site is close to a Local Wildlife Site, the Bourne Valley Woods. However, the criteria for the objective specifies distance from internationally and or nationally designated biodiversity or geodiversity sites, not a local designation.</p> <p>Whilst the openness of the site and its proximity to a local designation are noted, on this basis we would suggest that this objective should be scored as negligible or, at worst, uncertain minor negative at this stage.</p> <p>Flooding & Drainage</p> <p>The Environmental Agency Flood Maps show that a small proportion of the western site boundary is within Flood Zone 3 meaning it is at the highest risk of flooding as shown within the Transport, Infrastructure and Environmental Review (see Appendix 1). In addition part of the north of the site is affected by surface water flooding, but the vast majority of the site is not affected by flood risk. There is the potential for development to avoid areas of flood risk and implement</p>	<p>The site receives an uncertain significant negative effect against SA objective 5: biodiversity and geodiversity. This is due to the fact the site is within 250m of Bourne Valley Woods Local Wildlife Site and Ancient Woodland, and contains green infrastructure assets (thick vegetation).</p> <p>Although development of this site offers the opportunity to achieve biodiversity net gain, these are 'policy-off' appraisals that do not take into consideration mitigation. This ensures all sites are appraised on a consistent basis.</p> <p>With regard to SA objective 6: landscape, the site receives an uncertain significant negative effect because it is located within the North Downs AONB.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect. The uncertain significant negative effect is as a result of the site containing land with a 1 in 30 year risk of surface water flooding. Further to this, there is some overlap with a watercourse in the north west of the site and therefore it is uncertain what effect development might have on the watercourse in terms of water quality. Although the respondent has said that flooding will be dealt with appropriately through respecting existing surface water flows and incorporating mitigation measures such as SuDS, this is a 'policy-off' appraisal that does not take into consideration mitigation. Each reasonable alternative development site option has been appraised on a 'policy-off' basis, which means that it has been appraised on its physical constraints only. This ensures all sites are appraised to a consistent level of detail. If a site is allocated in the Local Plan via a policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

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		<p>sustainable drainage strategies to ensure that the risk of flooding from surface water is fully mitigated.</p> <p>It is noted that the SA assesses the site as significant negative in relation to flooding (objective 8) and, as highlighted in our questionnaire response, this would benefit from further consideration as the flooding constraint affects only part of the site. There is potential to mitigate the impacts of development through locating the development outside of the flood zones and incorporating a sustainable drainage strategy.</p> <p>Overall</p> <p>Overall there are no technical or environmental issues that would prohibit development, including in relation to the impact of development on Kent Downs AONB, highways, landscape, ecology and flooding considerations.</p> <p>The site is well contained by existing residential development to the east as well as north and roads to the north and south and well related to the existing edge of Borough Green. It does not reflect the typical characteristics of the AONB and it could be released from both the AONB and Green Belt designations as part of the Local Plan review given the existence of exceptional circumstances.</p> <p>The site is sustainably located as well as suitable, available and achievable for development in the first five years of the Local Plan and, given its limited contribution to Green Belt purposes, we consider that it should be allocated.</p>	
38330753	General	<p>Site 59791 and 5979</p> <p>SA1: The medical centre quoted, does not exist at the present time or in the near future. The local GP surgery is unable to cope with the present level of patients, any additions could reduce the service to a dangerous level. The site is within an area of open space and much needed for the well-being of the local residents, including allotment space.</p> <p>SA2: The exit roads from the development would come out onto a single/narrow country lane with bad visibility.</p> <p>SA3: The primary is full and there are no secondary schools within 3 miles.</p> <p>SA5: The taking of agriculture land for would not enhance the well-being of local residents, but also reduce food supplies.</p> <p>SA6: The AONB mentioned is only 100 mtrs from the proposed development and this development will have an effect on local wildlife, including badgers. The area also rises to an SSSI risk area and is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8: The rainfall on the North Downs which is at present absorbed by agricultural fields would not have any natural soak-away if these fields are replaced by roads and properties. The gradient means that surface water would drain to the houses below increasing the risk of</p>	<p>The proformas for sites 59791 and 59792 state that they are either within 800m of an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both). Specifically, both sites are within 800m of an area of open space and some walking paths. The SA acknowledges that both sites contain an area of open space that could be lost as a result of development, although this is uncertain. The overall effect for both sites against this objective is mixed uncertain significant negative and minor positive.</p> <p>The SA is too high-level to give consideration to sight lines.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to the respondent's comment on SA objective 5: biodiversity and geodiversity, agricultural land is dealt with separately under SA objective 9. Sites 59791 and 59792 are recorded as having significant negative effects in relation to SA objective 9L soils, as they</p>

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		<p>flooding the in the village. KCC already state that the water system cannot cope with the current amount of water passed into it during extreme weather events, drains are already becoming overloaded, causing flooding towards the river.</p> <p>SA10: There is no bus service, the bus stop is now redundant. This means that residents of any new properties would need to use their cars for all journeys, therefore increasing gas emissions. This is not a minor positive, but a major negative.</p> <p>SA11: The lack of public transport and the increased use in private vehicles will only increase emissions which will additionally contribute to climate change and NOT minimise any impact.</p> <p>SA12: Air quality in Wouldham has been a bone of contention and more vehicles with the congestion they bring will only add to the poor air quality.</p> <p>To summarise these answers to sites 59791 and 59792. It is very obvious that these sites are not suitable for housing due to the lack of infrastructure, including no schools, no medical centre and no bus service. The road infrastructure is already unable to cope with the increased traffic caused by Peters Village and the bridge. KCC have continually investigated options for road improvements but are unable to implement any solution even to alleviate the present traffic problems.</p>	<p>are greenfield and contain a significant proportion of Grade 1 and/or 2 agricultural land.</p> <p>With regard to the respondent's comment on SA objective 11: climate change adaptation, sustainable transport is considered separately under SA objective 10: climate change mitigation. Sites 59791 and 59792 receive minor positive effects in relation to SA10, as they are more than 800m from a railway station but within 400m of a bus stop. Air quality is dealt with separately under SA objective 12: air. With regard to SA12, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). The sites listed are not within 100m of an AQMA.</p> <p>The SA uses 500m as a threshold for determining effects on the AONB. Due to the fact both sites are within 500m of an AONB, both receive an uncertain significant.</p> <p>Neither site has been identified as being at risk of flooding, including surface water flooding.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
42527265	General	<p>Site 59791</p> <p>SA1 is incorrect. There is no health facility within 800 mtrs.</p> <p>SA3 is incorrect. There is no secondary school within 800mtrs which is an issue as the bus service is not secure. The primary school is already full and current students already need to travel to schools outside of the area.</p> <p>SA6. The site rises to an AONB and an SSSI risk area. It is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8. The gradient of the site means that by changing the land from farmland (which soaks up water) to buildings, means that surface water would drain to the houses below increasing the risk of flooding in the village. KCC already state that the Southern Water system cannot cope with the amount of water being currently passed to it during extreme weather events. This was reported to them as recently as 21/09/2022 under their Ref No: 4431246</p> <p>SA10 is incorrect. There may be a bus stop within 400 mtrs, but there is only a bus twice a week.</p> <p>Your hierarchy statement says that 'rural' areas would not have major development.</p> <p>Also, with the lack of buses, more cars are needed. The road infrastructure is already unable to cope with the increase in traffic caused by the Peters Village development and the bridge. KCC have</p>	<p>The proformas for sites 59791 and 59792 state that they are either within 800m of an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both). Specifically, both sites are within 800m of an area of open space and some walking paths. The SA acknowledges that both sites contain an area of open space that could be lost as a result of development, although this is uncertain. The overall effect for both sites against this objective is mixed uncertain significant negative and minor positive.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Neither site has been identified as being at risk of flooding, including surface water flooding.</p> <p>With regard to SA objective 6: landscape and townscape, site 59792 already receives an uncertain significant negative effect. All negative effects against this objective are recorded as uncertain, as the actual</p>

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		<p>looked at possible solutions to solve the immediate problem with a one way system. However, this will not be sufficient to accommodate any further development in the area. The only access for construction vehicles would be through the High Street or Borstal which are both restricted and totally impractical.</p> <p>Site 59792</p> <p>SA1 is incorrect. There is no health facility within 800 mtrs.</p> <p>SA3 is incorrect. There is no secondary school within 800mtrs which is an issue as the bus service is not secure. The primary school is already full and current students already need to travel to schools outside of the area.</p> <p>SA6. The site rises to an AONB and an SSSI risk area. It is next to a rural settlement which would have their views of the AONB ruined.</p> <p>SA8. The gradient of the site means that by changing the land from farmland (which soaks up water) to buildings, means that surface water would drain to the houses below increasing the risk of flooding in the village. KCC already state that the Southern Water system cannot cope with the amount of water being currently passed to it during extreme weather events. This was reported to them as recently as 21/09/2022 under their Ref No: 4431246</p> <p>SA10 is incorrect. There may be a bus stop within 400 mtrs, but there is only a bus twice a week.</p> <p>Your hierarchy statement says that 'rural' areas would not have major development.</p> <p>Also, with the lack of buses, more cars are needed. The road infrastructure is already unable to cope with the increase in traffic caused by the Peters Village development and the bridge. KCC have looked at possible solutions to solve the immediate problem with a one way system. However, this will not be sufficient to accommodate any further development in the area. The only access for construction vehicles would be through the High Street or Borstal which are both restricted and totally impractical.</p>	<p>effects will depend on the final design, scale and layout of development.</p> <p>With regard to SA objective 8: water, the site is recorded as having a negligible effect as it is within Flood Zone 1 (i.e. not at risk of flooding) and does not contain a water body or watercourse, or fall within a Source Protection Zone.</p> <p>With regard to SA objective 10: climate change mitigation, the site assessment criteria do not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section in the SA entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p>
42651073	General	<p>* Site IDs 59735 overlaps with site IDs 59798, 59804 and 59835 and yet these sites have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* The SA assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735 is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p>

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		<p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42660705	General	<p>Site ID 59735 overlaps with site id's 59798, 59804 and 59835 under Hildenboro' ward yet has several different assessment outcomes which don't appear logical or credible.</p> <p>For all sites the assessments need to take greater account of impact of development of the land on human health SAI greenhouse emissions and SA10 local air quality</p> <p>Horns Lodge Lanne which is next to site id 59735 is a popular exercising route/location for joggers, walkers, dog walker, cyclist etc and a vital area for physical well -being and mental well health of the local community. Development of this area will significantly increase traffic, increase pollution, noise pollution to the detriment of the benefits of the areas use currently</p> <p>Site id 59735 assessment shows minor positive outcomes for SA3 yet local schools are already at maximum capacity and limited number of them. Hence additional development will not improve educational attainment in their own right</p> <p>Development of site id 59735 will result in loss of vitally important green belt, destroy and compromise woodland areas, with increased traffic having significant impact on congestion and local air quality</p> <p>A large oil pipeline which is essential to national energy supply passes through land in site id 59735, and I believe there are government protection orders re this essential supply line with historically was used to transport fuel in wartime. This was repaired under various government contracts a few years ago</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>

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42662497	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42672097	General	<p>1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those</p>

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		<p>additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42675169	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42686465	General	<p>1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is</p>

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		<p>health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42686593	General	<p>1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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		have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.	SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.
42700225	General	<p>1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42714625	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected</p>

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42714721	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>

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42719745	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those</p>

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42730497	General	<p>* Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42801025	General	<p>1. Site IDs 59798, 59801, 59804 and 59835 have overlapping areas, and also overlap with site 59735 under the ward of Cage Geen, yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site IDs 59798, 59801, 59804 and 59835 (and others), the assessments need to take greater account of the impact of</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is</p>

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42801025	General	<p>1. Site ID 59735 overlaps with site IDs 59798, 59804 and 59835 under the ward of Hildenborough yet has numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>2. For site ID 59735 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>3. Horns Lodge Lane, which abuts site ID 59735, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of this areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>4. Site ID 59735 assessment shows minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>5. Development of site ID 59735 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>6. A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site ID 59735 and is understood to</p>	<p>The site boundaries for 59735, 59798, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA.</p>

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		have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.	SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment. The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.
42717377	General	<p>Site 59808</p> <p>SA Objective 1 - significantly positive??? There is a tiny oversubscribed medical practice that is bursting at the seams. This is an wrong assessment.</p> <p>SA Objective 5 - Uncertain??? negavite? this is a Green Belt and a wildlife habitat, with several ponds nearby home for Great Crested Newt. It seems absolutely certain negative.</p> <p>SA Objective 14 - any "positive" effect here would be offset by huge negative effect on existing neighbouring housing. The process of building of 222 new homes would have dramatic effect on the well-being of the people leaving there. New residential area there would transform the environment of those houses - from the existing edge-of-the-village quiet place to a middle-of-a-town-with-a-busy-road kind. Therefore ++ assessment is wrong.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). Site 59808 receives a significant positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an existing healthcare facility, in addition to an existing area of open space and walking paths.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective are recorded as uncertain as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>SA objective 14 related to housing delivery. As site 59808 is proposed to deliver 100 dwellings or more, it receives a significant positive effect in relation to this objective.</p>
42718401	General	<p>* Site IDs 59735, 59798, 59801, 59804 and 59835 cover a unique area of greenbelt land which sits between Tonbridge, Hildenborough and Shipbourne and has many bridleways and footpaths and so is accessed and enjoyed by horse-riders, cyclists and walkers. Development on these sights would have a devastating impact on the openness and permanence of the greenbelt land between Coldharbour Land and Horns Lodge Lane.</p> <p>* Site IDs 59798, 59801, 59804 and 59835 have overlapping areas, and also overlap with site 59735 under the ward of Cage Geen, yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* Sites 59801 and 59798 correctly have SA2 assessed as '--' and as such are flagged as least suitable for development. Sights IDs 59735, 59835 and relevant parts of 59804 should be equally scored '--' for SA2 and as such should also be ranked amongst the least suitable.</p> <p>* For site IDs 59798, 59801, 59804 and 59835 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site IDs 59798, 59801, 59804 and 59835, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties</p>

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		<p>in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59798, 59801, 59804 and 59835 assessments show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site IDs 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>
42719233	General	<p>Site 59808</p> <p>SA Objective 1. There is no available health care within 800m! Despite the size of the building, the existing GP surgery is limited and over subscribed for many years. We use a surgery locates 2.2 miles away in Tonbridge. It takes up to 30 mins to get there by bus in the morning.</p> <p>SA Objective 5. Building on Green Belt land can ruin some of the country's most pristine habitats and negatively affect our rarest species. There is Great Crested Newt in ponds around. Loss of green belt and greenfield sites for housing negatively affects the environment, releasing carbon from the land and losing that land's ability to capture new carbon.</p> <p>SA Objective 10. There is no ANY bus from Hildenborough to train station since 2019! 3 years there is no any public transport to the station that locates 40 mins walking distance far from the village!</p> <p>SA Objective 14. The main road in Hildenborough is busy 24/7. I believe that additional housing will create significant traffic jams between 8 am - 9:30am and from 3:30pm till 6pm. My son reaches the school in Tonbridge within 35 mins in the morning by bus. The journey distance is around 3 miles. His classmate leaves in Orpington (Bromley) at the same time (8am) and reaches the school that is from his house 20 miles away within 30 mins by train.</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). Site 59808 receives a significant positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an existing healthcare facility, in addition to an existing area of open space and walking paths.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, the site receives a significant negative effect. All effects against this objective are recorded as uncertain as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The SA acknowledges that the site comprises greenfield land, under SA objective 9: soil.</p> <p>Site 59808 is within 400m of a number of bus stops. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities. SA objective 14 related to housing delivery. As site 59808 is proposed to</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
			<p>deliver 100 dwellings or more, it receives a significant positive effect in relation to this objective.</p> <p>The SA is too high-level to give consideration to traffic levels, and so the Council will commission additional evidence on this amongst other matters.</p>
42719745	General	<p>* Site IDs 59735, 59798, 59801, 59804 and 59835 cover a unique area of greenbelt land which sits between Tonbridge, Hildenborough and Shipbourne and has many bridleways and footpaths and so is accessed and enjoyed by horse-riders, cyclists and walkers. Development on these sights would have a devastating impact on the openness and permanence of the greenbelt land between Coldharbour Land and Horns Lodge Lane.</p> <p>* Site IDs 59798, 59801, 59804 and 59835 have overlapping areas, and also overlap with site 59735 under the ward of Cage Geen, yet have numerous different assessment outcomes, which does not appear to be credible or logical.</p> <p>* Sites 59801 and 59798 correctly have SA2 assessed as '--' and as such are flagged as least suitable for development. Sights IDs 59735, 59835 and relevant parts of 59804 should be equally scored '--' for SA2 and as such should also be ranked amongst the least suitable.</p> <p>* For site IDs 59798, 59801, 59804 and 59835 (and others), the assessments need to take greater account of the impact of development of the land on human health (SA1), greenhouse gas emissions (SA10), and local air quality (SA12).</p> <p>* Horns Lodge Lane, which abuts site IDs 59798, 59801, 59804 and 59835, is widely used by walkers, dog walkers, horse riders and cyclists of all ages on a daily basis and as such plays an important role in supporting the physical and mental well-being of a wide cross-section of the local community. Development of these areas for residential and/or mixed use will significantly increase traffic, noise and local pollution with significant detriment to these current community benefits.</p> <p>* Site ID 59798, 59801, 59804 and 59835 assessments show minor positive outcomes for SA3, yet local schools are limited and already at maximum capacity. Hence additional development of these land areas will NOT improve educational attainment in their own right.</p> <p>* Development of site IDs 59798, 59801, 59804 and 59835 will result in the loss of vitally important local Green Belt, destroy or compromise woodland areas, and significantly increase local traffic with negative impact on congestion and local air quality.</p> <p>* A large oil pipeline which is essential to energy supplies in the wider region passes through the land in site IDs 59798, 59804 and 59835 and is understood to have protection orders preventing development of the land around and above it. This fact alone must significantly reduce the suitability of the areas for development.</p>	<p>The site boundaries for 59735, 59798, 59801, 59804 and 59835 are not the same, but similar. Due to the fact the boundaries differ and different types and sizes of development are proposed on each, the SA effects differ between them.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is too high-level to give consideration to traffic, and so the Council will commission additional evidence on this. Air pollution is covered under SA objective 12, which looks at the proximity of sites to Air Quality Management Areas.</p> <p>All five sites have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is high-level and therefore does not give consideration to pipelines. This is something that will instead be considered at planning application stage if the site is allocated.</p>

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42719233	General	<p>SITE 59808</p> <p>SA Objective 1: There is no available health care within 800m! Despite the size of the building, the existing GP surgery is tiny with limited service and it is over-subscribed for many years. We use a surgery locates 2.2 miles away in Tonbridge. It takes up to 30 mins to get there by bus.</p> <p>SA Objective 5: Building on Green Belt land can ruin some of the country's most pristine habitats and negatively affect our rarest species. There is Great Crested Newt in ponds around. Loss of green belt and greenfield sites for housing negatively affects the environment, releasing carbon from the land and losing that land's ability to capture new carbon.</p> <p>SA Objective 10: There is no ANY bus from Hildenborough to train station since 2019! There are no cycling path throw the wood to the train station to reduce carbon emmisiion.</p> <p>SA Objective 14: New 222 houses means extra upto 444 cars in the village. The main road in Hildenborough is busy 24/7. I believe that additional housing will create significant traffic jams in peak hours. My son reaches the school by bus in Tonbridge within 35 mins. The school is less than 3 miles from home. His classmate leaves in Orpington (Bromley) at the same time (8am) and reaches the school at 8:35 am as well. Orpington is 20 miles away from the school.</p> <p>Any extra housing developments around Woodfield avenue will dramatically impact to the noise and pollution level, reduce price of the current houses due to changing from "close-to-nature" and "cul-de-sac" status to "through road".</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). Site 59808 receives a significant positive effect in relation to SA objective 1: health and wellbeing, as it is within 800m of an existing healthcare facility, in addition to an existing area of open space and walking paths.</p> <p>SA objective 5 relates to biodiversity, not the Green Belt. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59808 receives a significant negative effect in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Site 59808 is within 400m of a number of bus stops. SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>SA objective 14 related to housing delivery. As site 59808 is proposed to deliver 100 dwellings or more, it receives a significant positive effect in relation to this objective.</p> <p>The SA is too high-level to give consideration to traffic levels, and so the Council will commission additional evidence on this amongst other matters.</p>
42742753	General	<p>I am flabbergasted at the extent of the proposed development in and around Hildenborough. Allow me to elaborate, taking into consideration a number of the Sustainability Appraisal objectives:</p> <p>Human health and well-being - aside for the complete absence of consideration for the mental and physical health, and well-being of the existing residents of Hildenborough, I would specifically comment that the existing medical centre is already grossly overwhelmed and incapable of dealing with the existing demands. That is before we</p>	<p>All reasonable alternative development site options have been appraised consistently, in accordance with the site assessment criteria contained within Appendix D of the Interim SA Report. The justification text for the effects the sites are expected to have in relation to the SA objectives is provided in the proforma for each site, contained within Annex 1 of the Interim SA Report.</p> <p>SA objective 1: health and wellbeing looks at the proximity of sites to healthcare facilities, in addition to things like open space and walking paths as this can have beneficial effects on mental and physical health and wellbeing. The SA does not take into consideration the</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>factor in the impact of the ongoing Oakhill development in the former Fidelity grounds.</p> <p>Improve equality and access to community facilities and services - developers often offer investment in local facilities to appease councils, but it is a well-known fact that these promises are always contingent on contractual conditions that allow developers to reassess this provision if suitable staffing can't be found. The current infrastructure in Hildenborough has already exceeded its viability to local residents.</p> <p>Improve educational attainment - this is no longer possible in Hildenborough as the demand for local school places already outstrips the availability. The two schools that exist today were founded 175 years and 53 years ago. With the school age population of Hildenborough doubling over the last 50 years, it's no surprise that local children are no longer able to attend local schools. Further increasing local housing, will only exasperate this problem.</p> <p>Sustainable economic growth - this will not bring economic growth to Hildenborough. For example, residents buying £1m+ properties in the private gated Oakhill development, are unlikely to be utilising the local hairdressers or buying their weekly shop from the One Stop - providing Waitrose delivery drivers can get past the private gates.</p> <p>Green infrastructure - this is one of the most significant concerns of the proposals. We are surrounded by beautiful countryside, that is the home to considerable wildlife, including a number of protected species, such as great crested newts. The environmental destruction would have a catastrophic impact. Proposals such as the one accessing Coldharbour Lane will place further stress on a road infrastructure that is barely capable of dealing with the current usage. The road is a single track unmarked and unlit road through greenbelt countryside that can not be adapted to handle traffic flow from any of the developed sites. There is already a significant danger to pedestrian users of the road (there is no pavement), which is used daily by local pedestrians to access the network of footpaths that start on the road.</p> <p>Borough landscape and township character - the agreement to allow the building of a monstrously large residential home on the site of the former Volvo garage, is another example of untamed overdevelopment that has changed the borough landscape forever. The fake fibreglass chimney pots really do appropriately cap off what has become a genuine eyesore to the community and character of the area. It's huge and can be seen from far and wide. My thoughts are truly with those families in the immediate shadow of this carbuncle, for whom the pleasure of being in their own homes or gardens will have been shattered forever. It leaves zero confidence that future developments would be any more sensitive to the local character. More probable, is that it will be used as the new low bar for what counts as acceptable.</p> <p>Protect water features - much of the proposed area for development is around streams and water. Hildenborough has a history of flooding,</p>	<p>capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>Access to services and facilities is addressed under SA objective 2: services and facilities, which has been informed by the Urban Capacity Study (July 2022). The criteria for SA objective 2 are found in Appendix D of the Interim SA Report.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. All mixed use and employment site options are expected to have positive effects on this objective, as they provide opportunities for new jobs.</p> <p>Green infrastructure is dealt with under SA objective 5: biodiversity and geodiversity. Most sites within Hildenborough receive significant negative effects against this objective, in the SA. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The effects of development on landscape are considered under SA objective 6: landscape and townscape. All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. However, the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Therefore, all negative effects are recorded as uncertain.</p> <p>Flood risk is dealt with under SA objective 8: flooding. Most of the sites in and around Hildenborough receive significant negative effects against this objective, as they contain land with a 1 in 30 year risk of surface water flooding. Some also contain water bodies and so development could have an adverse effect on water quality.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>due to overdevelopment around water. With the impact climate change and the expectation of more flood conditions, additional building will only worsen the issue both for new builds and existing properties.</p> <p>Reduce greenhouse emissions - the carbon footprint aligned to a new build is considerably more than the investment needed to upgrade an older property to produce a similar level of greenhouse emissions.</p> <p>Improve air quality - As a local resident who has lived through two years of construction from nearby developments, I can assure you that the construction noise, dust and air pollution, combined with the continuous mud caked roads, has to be lived with to be understood. When I look at the layer of dust that sits on my car, and imagine my children breathing in the same dust filled air, I despair. When coupled with the removal of local woodland to clear development sites and the subsequent increase in local carbon dioxide levels, air quality will deteriorate, cases of asthma will increase and the local collapsing medical centres will be further unable to cope.</p> <p>High quality housing - there is no doubt that developers will be intending to build high quality housing. But this will not be affordable, and certainly won't improve educational attainment for low-income families. Even for families assisted through affordable development initiatives, there are no school places.</p>	<p>this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>Air quality is dealt with under SA objective 12: air quality. As there are no Air Quality Management Areas in Hildenborough, the sites receive negligible effects against this objective. However, impacts on air quality will be discussed in the cumulative effects section of the next iteration of the SA. The amount of growth that will take place in the Borough over the Plan period is likely to have adverse effects on air quality.</p> <p>With regard to affordable housing, developers will be required by the emerging Local Plan to provide a percentage of affordable housing.</p>
42641505	General	<p>ALL HILDENBOROUGH SITES:</p> <p>SA Objective 1 – Access to the healthcare facility is poor and they are running at capacity. The quality and availability of care should be a consideration not just the distance to a building, current wait times for appointments exceed 2 weeks.</p> <p>There is no local facility for dentists.</p> <p>SA Objective 3 – the capacity of educational establishments is low and additional developments would likely need additional facilities to be delivered before building dwellings, the size of any new school would significantly impact on the number of dwellings then available to be developed as well as result in incoming road journeys for families out of the immediate area brining in their children to fill spaces. If not provided then there would be additional road journeys to deliver children to their schools.</p> <p>SA Objective 12 –Additional cars on the already congested A245 would likely lead to more occurrences of the already frequent stationary traffic and further reducing air quality. This road is the alternative route for the A21 when that is closed which frequently leads to long queues and poor air quality. The state of the road is poor and this would likely get worse with additional traffic, during rain the A245 always has large quantities of standing flood water which makes footways impassable and a change of land use would likely make this worse or over strain waste water drainage.</p> <p>All of the above sites listed will impact the local infrastructure (healthcare, schools and buses, water supply/drainage/cleaning,</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). The SA does not give consideration to access to dental treatment.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality Management Area (AQMA). As there are no Air Quality Management Areas in Hildenborough, the sites receive negligible effects against this objective. However, impacts on air quality will be discussed in the cumulative effects section of the next iteration of the SA. The amount</p>

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		<p>electricity, gas, wired and wireless telecoms) which are all already at straining point.</p> <p>It doesn't appear to have been taken into account that we are about to have a further 75 rooms in the new care home (thus significant NHS Services) and a further 160+ homes/apartments in the new Oakhill development (previously Fidelity). Transport links are currently strained, with many bus routes reduced and buses over crowded during peak times. A21 closures continue to cause havoc through the village and air pollution is significantly increased during these times.</p> <p>With the exception of 59771, all of the land proposed is Green belt which should by its nature prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence as per government description! Changes to the land will significantly change the setting and special character of Hildenborough as adopted by TMBC in its Adopted Hildenborough Character Areas Appraisal, Hilden park area. Additionally it would likely force a change its status of Urban Service Centre to Urban!</p> <p>The recent developments in Hildenborough (Oakhill, and Hlyden Heights) are developed and promoted to non locals increasing the population by default and at no financial discount from market rates thus perpetuating a situation of UN-affordability.</p> <p>With an ever increasing population through out of city transfer, the need for additional infrastructure and housing is not going to be sustainable for this area or met by the current targets and the need for proposed sites will be endless to feed developer demand.</p> <p>Site ID: 59592, 59808,</p> <p>Response provided as a single block as they likely interact due to proximity.</p> <p>SA Objective 1 – Access to the healthcare facility is poor and GP are running at capacity. The quality and availability of care should be a consideration not just the distance to a building</p> <p>SA Objective 3 – the capacity of educational establishments is low and additional developments would likely need additional facilities to be delivered before building dwellings, the size of any new school would significantly impact on the number of dwellings then available to be developed.</p> <p>SA Objective 4 – there is unlikely to be significant space or capacity for economic or business development at the site or in the immediate area.</p> <p>SA Objective 5 – These two sites cover the habitat and migratory routes (established animal trails) for various animals, I have at this location observed slow worms, newts (crested but not disturbed to confirm), stag beetles, damson/dragon fly, bats, hedgehogs, pheasant, birds of prey (feeding in the field and resting in the trees), mice, small herds of deer (including young), foxes and badger.</p>	<p>of growth that will take place in the Borough over the Plan period is likely to have adverse effects on air quality.</p> <p>Sites 59592 and 59808 are not within 100m of an Air Quality Management Area (AQMA) and so receive negligible effects in relation to SA objective 12: air quality. The SA is too high-level to consider traffic congestion, and so the Council will commission additional evidence on matters including traffic.</p> <p>The SA does not take into consideration currently/recently permitted planning applications, and instead appraises each reasonable alternative development site option on its own merits.</p> <p>SA objective 10: climate change mitigation (and SA objective 4: economic growth for mixed use and employment site options) does not take into consideration the frequency of bus services, as this is subject to change on a regular basis and is not mapped spatially. In the next iteration of the SA Report, this limitation will be added to the section entitled 'Difficulties and Data Limitations'. Bus service frequency is, however, taken into consideration in the Urban Capacity Study (July 2022), which informs SA objective 2: services and facilities.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessment and uses a different basis for assessment.</p> <p>With regard to affordable housing, developers will be required by the emerging Local Plan to provide a percentage of affordable housing.</p> <p>With regard to SA objective 4: economic growth and sites 59592 and 59808, residential sites are recorded as having a negligible effect in relation to this objective as their location will not directly influence sustainable economic growth or the delivery of employment opportunities.</p> <p>Sites 59592 and 59808 both receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>Sites 59592 and 59808 are incorrectly recorded as receiving significant negative effects in relation to SA objective 6: landscape and townscape. In the next iteration of the SA Report, they will receive minor negative effects, as they are located on the edge of the settlement. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>The SA is too high-level to consider specific road networks, and so the Council will commission additional evidence on matters including traffic.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Investigation should be completed by the relevant public bodies to check if this is also a natural habitat and breeding zone for any protected species. Any development would also lower the natural quality of the natural water source.</p> <p>The land also has a busy designated public footpath that is in regular use by the local and surrounding residents for mental well-being & dog walking (thus reducing capacity on the local NHS services).The appeal of this footpath is its green character easily accessed on the edge of a housing area.</p> <p>SA objective 6 - this site would significantly expand the number of dwellings in the area changing the character of the location and creating urban sprawl and contributing to the coalescing of Hildenborough and tonbridge.</p> <p>There would be limited additional transport possibilities and no additional roads therefore maintaining the one major through road that is already at capacity with regular stationary traffic causing additional pollution and air quality issues. This road is used as an alternative route when the A21 is regularly closed. This would be made worse with additional housing.</p> <p>The site is also fronted by many trees which set the character of the village as defined in the TMBC Adopted Hildenborough Character Area SPD (Hilden park) (https://www.tmbc.gov.uk/downloads/file/1247/hilden-park-area.) This view, Character and aspect of the village should be preserved to maintain the local landscape and historical character and biodiversity.</p> <p>There are a large amount of old trees within the fields, both of which protect the adjacent housing from flooding. Water run-off from the land already impacts the neighbouring main Tonbridge Road, which is regular under pressure during winter months (drains are always spilling over and water is laying on the busy road).</p> <p>SA Objective 8 – There are small bodies of water in on this site that I have observed newts and other aquatic animals, developing this site would put these at risk.</p> <p>During the winter the land here is significantly waterlogged and houses on Orchard Lea are damp and have standing water in the gardens. Reducing the amount of open land on the hill would make this situation worse for the area. Additionally the A245 has standing water with any sort of rain this would likely be worse if this site was developed.</p> <p>SA Objective 10 – Any new development would generate substantial greenhouse gas in its manufacture (especially concrete), this is unavoidable, and would likely significantly offset the distance from public transport.</p> <p>SA Objective 12 – the additional cars on the already congested A245 would likely lead to increases in stationary traffic and further lower air quality. This road is the alternative route for the A21 when that is closed which frequently leads to stationary traffic and poor air quality,</p>	<p>Sites 59592 and 59808 receive significant negative effects in relation to SA objective 7: heritage, as they are within 250m of heritage assets, as recorded in the Kent Historic Environment Record. All effects against this objective are recorded as uncertain, as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. The sites are not in particularly close proximity of the Hildenborough Conservation Area.</p> <p>With regard to SA objective 8: water, the SA acknowledges the water body present within site 59808. Both sites 59592 and 59808 receive significant negative effects in relation to this objective, as they contain land with a 1 in 30 year risk of surface water flooding, and site 59808 contains a water body. The effect for site 59808 is recorded as uncertain, as it is unknown what effect development might have on water quality.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>Site 59808 receives a significant positive effect in relation to SA objective 14: housing, as it is expected to comprise 100 dwellings or more. Site 59592 receives a minor positive effect, as it is expected to comprise fewer than 100 dwellings.</p> <p>Site 59804 is incorrectly recorded as receiving an uncertain significant negative effect in relation to SA objective 6: landscape and townscape when it should have received an uncertain minor negative effect. This is because it is located on the edge of a settlement. However, it is acknowledged that the size of the site would likely have adverse effects on the landscape.</p> <p>Sites 59669, 59679, 59653, 59656, 59615 and 59692 all receive significant negative effects in relation to SA objective 8: water, as they contain land with a 1 in 30 year risk of surface water flooding. Site 59688 receives an uncertain significant negative effect in relation to SA objective 8, as in addition to containing land with a 1 in 30 year risk of surface water flooding, it contains numerous water bodies and so it is unknown what effect development might have on water quality. The SA also acknowledges the biodiversity present at each of these sites, in addition to 59771, under SA objective 5: biodiversity and geodiversity.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>this road MUST be considered beyond capacity due to its nature as a defined alternative route for a major arterial route (A21)</p> <p>SA Objective 14 – Due to the shape of the site and the gradient of the hill, plus the presence of large old established and protected trees and water sources, it would be likely that the number of dwellings may be less than expected. The access to the site would likely be compromised. I do not think any housing at this location would ever be considered affordable as developers would prioritise larger dwellings at full market price evidenced by the development of the former fidelity site where the open land was developed as a small number of oversized (5+ bed)high value (£1M+) homes, certainly not affordable by any stretch! Berkley Homes would likely look to continue this trend in an expansion of the current development.</p> <p>Site ID 59804</p> <p>The development of this site would be an extreme case of urban sprawl and would coalesce Tonbridge and Hildenborough forcing a complete loss of identity for the village. The loss of green belt and arable land of such a magnitude as well as the coalescence and sprawl is unconscionable.</p> <p>Site:59669,79,53,56, 15,92 &88. All of these sites are within the Flood zone and increase the likihood of flooding to this area and adjacent lower lying areas (Leigh Road and Brookmead) significantly.</p> <p>These fields and trees naturally absorb much of the water run off which would filter through to the adjacent residential area and importantly to the Stocks Green school and high risk area of Brookmead.</p> <p>The land here is home to many large established trees and supports a diverse range of wildlife including but not limited to badgers, deer, bats and foxes. Additional surveys would be required to identify further species especially protected ones.</p> <p>Site: 59771 - The stream and surrounding habitat that is within this site is home to 'rare crested newts', which are endangered and protected by law. They were first discovered during the Oil Pipeline enhancements in 2018. Access is also restricted to Renovo Care home.</p>	
42803969	General	<p>We are residents of Vauxhall Gardens and would like to make our objections clear on the proposed developments at sites 59696, 59697, 59554 and 59555. 59696 & 59697 Objective 1: We appreciate that both sites are within 800m of an existing healthcare facility, but the Council needs to consider that the local healthcare facilities are under much strain due to the increasing population in the area. I agree that there is a walking/cycle path, but this is not a huge amount of space and I am concerned that this will give rise to further congestion. Objective 3: We accept that both sites are within 800m of an existing secondary and primary school. We would like to highlight that it is uncertain whether the schools will have the capacity to accommodate new pupils. Due to the increasing number of children attending the schools in the local area, we can confirm from personal experience that Pembury Road gets increasingly congested and there is not</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). Sites 59696 and 59697 receive significant positive effects in relation to SA objective 1: health and wellbeing, as in addition to being located close to a GP surgery, are also located within close proximity of existing areas of open space and walking paths. The same applies to sites 59554 and 59555, although both these sites also</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>enough space on the pavements to accommodate all of the foot traffic. Development on these sites will increase the population in the area drastically and cause further congestion. There are two secondary schools that already lead out on Pembury Road and one Primary School in close proximity. This already gives rise to a significant amount of vehicle traffic and stimulating the provision of new schools in this specific area would give rise to excessive traffic in an area that is already struggling. Objective 5: We do not believe the development would protect the existing natural environment and cannot stress the importance of maintaining the geodiversity as it stands. We disagree with the view that the council could develop the site while conserving or potentially enhancing the green infrastructure. It is particularly important to note that open spaces in the sites allow for sustainable drainage as much of the rainwater streams into the space and manages the flood risks in the surrounding roads. The sites are also the home of several wildflowers and animals which is essential to our ecosystem especially as we try to manage our carbon footprint. Objective 6: The sites are in close proximity to AONBs and developing in these areas tarnishes the existing green landscape. The trees, wildflowers and animals are part of the historic parks and gardens in the area and are essential parts of our local ecosystem and heritage. Objective 8: We do see surface water flooding on the local residential roads. By developing the sites, we are increasing activity and will give rise to limited access points for surface water to escape. Objective 9: The sites are agricultural land and should be protected instead of being developed. Objective 10: Even though the sites are more than 800m away from the local station, the development would increase our carbon footprint. If we were to leave the land undeveloped, this would in turn help combat climate change and allow the green ecosystem to convert carbon dioxide into oxygen. The dwellings will increase our carbon footprint due to the increase in the number of cars in the area. Objective 11: The development of the sites will have an adverse effect on the climate as it results in a limited amount of open space in the area. Objective 14: This part of Tonbridge is already under significant strain and an additional 100 dwellings would result in a significant strain on the immediate infrastructure (namely Pembury Road). This road is already incredibly congested and we also get large freight vehicles who use the road and this causes a significant amount of traffic. Pembury Road is in use 24 hours a day and an additional 100 dwellings would lead to an increased amount of cars on a road that is already struggling. There simply is not enough space to allow development. 59554 and 59555 We would object to developments on the above-mentioned sites due to the reasons mentioned above. We would also argue that development on sites will result in an already congested road becoming even further congested. The sites will provide fewer than 100 dwellings and result in losing already limited open space. We appreciate that there is a housing crisis and the Council is under pressure to develop new homes to assist with this. That said, it is equally important for the council to protect and avoid developments on sites which play a significant role in our town's</p>	<p>receive uncertain significant negative effects in relation to SA objective 1 as they contain existing areas of open space.</p> <p>With regard to SA objective 3: education, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is too high-level to consider traffic congestion and so the Council will commission additional evidence on matters including traffic.</p> <p>Sites 59696 and 59697 receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within close proximity to biodiversity assets. Sites 59554 and 59555 receive minor negative effects as they are not within 250m of biodiversity assets but within 250m to 1km of biodiversity assets. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The SA acknowledges sites 59696, 59697, 59554 and 59555 as located within 500m of the AONB and for this reason both sites receive a significant negative effect in relation to SA objective 6: landscape and townscape. All adverse effects against this objective are recorded as uncertain, as effects on landscapes and townscapes are also dependent on the design, scale and layout of development.</p> <p>Site 59697 is recorded in the SA as having a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. Sited 59696 and 59555 on the other hand, are recorded in the SA as having minor negative effects in relation to SA objective 8, as they contain land with a 1 in 100 year risk of surface water flooding. Site 59554 receives a negligible effect as it has not been identified by the Environment Agency at risk of flooding.</p> <p>Site 59697 is recorded in the SA as having a significant negative effect in relation to SA objective 9: soil, as it is greenfield and contains a significant proportion of Grade 3 agricultural land. The effect is recorded as uncertain, as it is unknown whether the site comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land. Sites 59696, 59554 and 59555 are recorded in the SA as having a minor negative effect, as they contain less than a significant proportion of Grade 1, 2 or 3 agricultural land.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture.</p> <p>Loss of open space is dealt with separately under SA objective 1: health and wellbeing. Sites 59696 and 59697 will not result in any loss</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>geodiversity and in turn have an impact on the climate. Pembury Road is under significant pressure due to the increasing number of residential roads leading up to it. There is also school infrastructure which has an ongoing effect on the roads. We find that our road (Vauxhall Gardens) gets increasingly congested when parents park up to collect their children from school. By increasing the number of dwellings we are increasing the severity of the problem. We cannot stress the importance of leaving some space undeveloped to ease the pressure on the local health facilities and emergency services. From our own prior experience, it was very difficult to obtain assistance from an emergency ambulance when our baby was in need of urgent medical assistance. The local ambulances were all occupied and we had to take our daughter to A&E ourselves. The population in Tonbridge is increasing and we need to empower our local health service to be able to manage this. We cannot afford to develop without first supporting the local bodies who are key to maintaining the health and welfare of the town. In this current climate, we need to work together as a community to minimise our carbon footprint and give our earth a chance to heal. Any type of development is dangerous to our climate and we need to give importance to the fact that the open space helps to heal the damage that we have caused by developing too quickly without realising the consequences until it was too late.</p>	<p>of designated open space whereas sites 59554 and 59555 will, and this is acknowledged in the SA. With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>SA objective 14 relates to housing delivery. As site 59696 is proposed to deliver 100 dwellings or more, it receives a significant positive effect in relation to this objective. Site 59697 is proposed to deliver fewer than 100 dwellings and so receives a minor positive effect in relation to SA objective 14: housing. Sites 59554 and 59555 are also proposed for fewer than 100 dwellings and so receive minor positive effects.</p>
42442561	General	<p>Kings Hill is over developed and an additional 1228 and 275 units south of Kings Hill is not sustainable, please refer to sites 59797 and 59800.</p> <p>Putting aside the lack of infrastructure specifically the inadequate arterial road network which effects all potential developments.</p> <p>Impact to the above sites includes but is not limited to the following:</p> <p>Loss of Kings Hill Golf Course including loss of local employment, bar, club staff and green keepers - Contrary to SA Objective 4 and 1</p> <p>Loss of enjoyment to golf members, including seniors, juniors and local associations using the club facilities contrary to SA Objective 5 and 1</p> <p>The site contains a body of water contrary to SA Objective 8</p> <p>The site is principally a golf course not agricultural land contrary to SA Objective</p> <p>The site expected to provide 1228 dwellings contrary to SA Objective 14 namely 100 dwellings. If a smaller site is being proposed, it should be shared with the community</p> <p>Loss of restaurant and bar used by non-members (Kings Hill residents)</p> <p>Loss of a local business namely Growing Golf which supports local schools, parents, and children on Kings Hill</p> <p>Loss of the above local amenity - which formed part of the original planning consent</p>	<p>The SA must give consideration to all reasonable alternative development site options (i.e. sites that could reasonably be considered for allocation but that may not be allocated), which includes all sites listed by the respondent. None of the sites appraised have yet been allocated.</p> <p>The SA is too high-level to consider specific road networks and so the Council will commission additional evidence on matters including traffic.</p> <p>Sites 59797 and 59800 receive uncertain significant negative effects in relation to SA objective 1: health and wellbeing, as they contain Kings Hill Golf Course. SA objective 4: economic growth relates to the delivery of employment opportunities. Both sites are expected to have a negligible effect in relation to SA objective 4 as "The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities". In the next iteration of the SA Report, however, a minor negative effect will be given to sites proposed for residential development that contain an existing business that could be lost as a result of residential development. Having said that, the promoter of this site has not declared that it contains an existing business.</p> <p>The sites receive significant negative effects in relation to SA objective 5: biodiversity and geodiversity, as they are within 250m of Kings Hill Golf Course, Cattering & Hoath Wood Local Wildlife Site and area of Ancient Woodland. They also contain green infrastructure assets. All effects against this objective are recorded as uncertain, as</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>Loss of public footpaths</p> <p>Loss of bridle way</p> <p>Loss of good quality farmland</p> <p>Protection of local habitat.</p> <p>Loss of wildlife including badgers and deer - contrary to SA Objective 5</p> <p>Loss of the scenic views to the river Medway and beyond - contrary to SA Objective 6</p> <p>Most of the site would not be within 800m of the existing health care facility which is unable to cater for the existing demand.</p> <p>Most of the site would not be within 800m of a school contrary to SA Objective 3</p> <p>Partial use of the site would effectively kill Kings Golf Club if it was unable to provide 18 holes to play on.</p> <p>Kings Hill Golf Course have a 125 lease on the land have not been approach by anyone including the landowner. The application is clearly speculative, it did not consider material facts, see to SA Objectives, and should be removed for consideration</p>	<p>appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>The SA acknowledges under SA objective 8: water that site 59800 contains a water body. For this reason, it receives a significant negative effect in relation to SA objective 8: water. The effect is recorded as uncertain as it is unknown what effect development might have on water quality.</p> <p>SA objective 9: soil utilises the Agricultural Land Classification, which is a system used in England and Wales to grade the quality of land for agricultural use. A site does not need to be in agricultural use to be classified under this system. Sites 59797 and 59800 comprise best and most versatile agricultural land and so receive significant negative effects in relation to SA objective 9.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>The proformas for sites 59797 and 59800 state that the sites are within 800 of either an existing healthcare facility <i>or</i> an existing area of open space/walking and cycle path/play area/sports facility. In this instance, neither site is within 800m of a GP surgery.</p> <p>With regard to proximity to schools, the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater.</p>
44667809	General	<p>[Site 59654]</p> <p>I am writing to OBJECT to the above site [Site 59654] which is on your local plan. My reasons are very much the same as my comments on 59699 but here they are again – apologies for the repetition but I was unsure if I could object to all the sites together.</p> <p>1 – This site is currently used for grazing with open fields near Oast Houses and Douces Manor.</p> <p>2 – This site is in Green Belt. Green Belt sites can only be used in exceptional circumstances. Developers making money is not an exception circumstance.</p> <p>3 – This site would hugely increase the traffic on Offham Road which at rush hour is already a very dangerous road. The only way to avoid this would be by going down Fatherwell Road which is a single-track</p>	<p>The SA does not give consideration to when a site is being used for grazing.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>The SA is too high-level to consider traffic levels, dangerous roads and road width, and so the Council will commission additional evidence on matters including traffic.</p> <p>The GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated, including site 59654.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>lane that floods on a regular basis. It is also designated as a Quite Lane.</p> <p>4 - Under your SA Objective 1 (the improvement to human health and wellbeing), you say the site is within 800m of an existing healthcare facility. This is not true so must be old information as we no longer have a surgery in West Malling. It is now going to be luxury flats – also mentioned below.</p> <p>5 – This site would put even more pressure on an already drowning infrastructure, it's very difficult to get a doctor's appointment as it is – especially after losing the West Malling Practice to expensive luxury FLATS. It's impossible to find an NHS dentist (I know as I have tried), and the parking is beyond its limit.</p> <p>6 – There are already a huge number of new homes being built locally, one example is the Crest development off Town Hill. This site is very unlikely to provide affordable housing and will not help those who do invaluable jobs with low salaries in our community. Also, the large proportion of these homes will be for sale so would not contribute to your SA Objective 10 (to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures).</p> <p>7 – There was a recent planning application (Ref 21/02003/FL) which was rejected by TMBC for a number of reasons - including that it was inappropriate development and harmful to the Green Belt and would represent an encroachment of the built-up area into the Countryside. Plus, the traffic concern.</p> <p>8 – West Malling has so much history, enough to suggest it should be a conservation area. We have The Abbey and its grounds, Douces Manor and park, Police Station Lane, Frog Lane, St Leonards Tower – the list of historic buildings in the High Street goes on and on. I feel the area is already being ruined by overdevelopment.</p> <p>On a personal note, I love West Malling but I can see it changing. Small and Large developments are popping up everywhere and the town just cannot cope. There are multiple empty houses on the High Street that should be utilised rather than building ugly new houses that are just not in keeping with the beautiful surroundings, and will not help our most vulnerable residents.</p>	<p>The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6). The SA does not give consideration to access to dental treatment.</p> <p>With regard to affordable housing, developers will be required by the emerging Local Plan to provide a percentage of affordable housing.</p> <p>Due to the high-level nature of SA, SA objective 10: climate change mitigation looks at access to public transport, although we note that this is only part of the much bigger picture. It is also acknowledged that the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>The SA does not take into consideration currently/recently permitted planning applications, and instead appraises each reasonable alternative development site option on its own merits.</p> <p>Site 59654 is within close proximity of a number of heritage assets, as recorded in the Kent Historic Environment Record. Therefore, it receives a significant negative effect in relation to SA objective 7: heritage. All effects against this objective are recorded as uncertain, as effects will also depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>
42807617	General	<p>[59714]</p> <p>LAND EAST OF OFFHAM ROAD, WEST MALLING (SA ID: 59714)</p> <p>I write further to the submission of the online Local Plan Regulation 18 consultation response form in relation to the above site to provide supplementary information on behalf of Berkeley Homes (Eastern Counties).</p> <p>Our response includes comments on the policy approaches set out in the draft Local Plan document as well as the Interim Sustainability Appraisal (SA) where we have some concerns about the ratings given to the site. Annex 1 of the SA includes an assessment of the land we</p>	<p>All reasonable alternative development site options have been appraised on a 'policy-off' basis and so consideration has not been given to mitigation and supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites). If a site is allocated in a Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA objective 2: services and facilities was informed by the Urban Capacity Study (July 2022). Therefore, the minor negative effect it receives in relation to SA objective 2 is correct.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>are promoting east of Offham Road, West Malling (ref 59714). A copy of our questionnaire response is included at Appendix 7.</p> <p>Part of this site was previously proposed for an allocation for 12 homes in the draft Tonbridge & Malling Local Plan (ref: LP25 eg) and, prior to this, the whole site was considered in the Local Plan evidence base. Whilst we welcomed the allocation, we were concerned that only developing the part of the site fronting Offham Road would have been a missed opportunity.</p> <p>We have prepared a preliminary site layout to test the capacity of site which is shown at Appendix 1. A development of approximately 66 homes as indicated could be delivered within 5 years, provide a mix of homes, including high quality affordable homes, compared to 12 homes, and make a more meaningful contribution to the Local Plan housing supply. The development would have a density of c. 25 dwellings per hectare and would relate well to the character of West Malling.</p> <p>Sustainability Appraisal</p> <p>It appears from the SA that the site may not have been assessed accurately against all criteria. The site, which measures 2.67 ha, is sustainably located on the edge of West Malling and offers excellent access to local shops and services including two primary schools, a church, a post office, pubs, restaurants, GP surgery, a number of retail outlets and a railway station. The site was however assessed as having 'fair' accessibility and a minor negative result in SA Objective 2: To improve equality and access to community facilities and services.</p> <p>Our response to the questionnaire includes an analysis of the scoring given to the site against the SA objectives including the accessibility criteria. It is clear from the analysis that the site is within 800m of a number of key services and amenities and should have been given a higher rating for accessibility. We therefore kindly request that the site is reassessed against the SA criteria, particularly Objectives 2 and 8 (see below).</p> <p>Highways</p> <p>We understand that one of the previous concerns cited as a reason to limit the size of a development in the draft Local Plan evidence was highways. As part of our preparations for the Local Plan examination in 2020, we undertook further work in relation to highways including seeking pre application advice from KCC.</p> <p>As shown by the correspondence, this reached the conclusion that there is no highways reason to limit the size of development on this site to 12 homes and that a larger development as proposed would be acceptable in terms of site access arrangements and impact on the local road network. A copy of the correspondence from KCC confirming the position is included at Appendix 2 together with a summary transport report by Glanville and a plan showing the proposed site access arrangement.</p> <p>Landscape & Green Belt</p>	<p>The SA is too high-level to consider traffic levels, and so the Council will commission additional evidence on matters including traffic.</p> <p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>Site 59714 receives an uncertain minor negative effect in relation to SA objective 6: landscape and townscape, as it is located on the edge of a settlement and so development may be more easily integrated into existing built development. All adverse effects against this objective are recorded as uncertain, as the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Consideration cannot be given to the Landscape Appraisal submitted by the site promoter, as all sites must be appraised on a consistent basis and information like this is not available for other sites. The same applies in relation to SA objective 7: heritage and the Heritage Statement submitted by the promoter.</p> <p>Site 59714 contains green infrastructure assets in the form of trees and thick vegetation, which could be lost as a result of development. In the next iteration of the SA Report, the following sentence will be added to the site assessment criteria: "The green infrastructure assets dataset includes a wide variety of features which may vary in their value". The site also receives a significant negative effect due to the fact it is adjacent to a Local Wildlife Site (St Mary's Churchyard, West Malling).</p> <p>As noted by the respondent, site 59714 contains a small area of land with a 1 in 30 year risk of surface water flooding. As SA utilises a precautionary approach, the significant negative effect is correct. The effect is recorded as uncertain, as the effects of new development on this objective will depend to some extent on its design and whether it incorporates Sustainable Drainage Systems (SuDS). Although the respondent makes reference to SuDS, this is a 'policy-off' appraisal and so mitigation is not taken into consideration.</p> <p>With regard to SA objective 9: soil, the Agricultural Land Classification still applies when a site is not actively being used for agricultural purposes.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>We were previously concerned that a partial release of the site from the Green Belt for a development of 12 homes sought to establish a revised Green Belt boundary not based on the physical features of the site contrary to NPPF para 143(f) and that the allocation would have left a residual area of Green Belt land behind with no useful purpose.</p> <p>The site as a whole does not contribute strongly to the purposes of the Green Belt, being effectively enclosed by existing development, the local road network and mature landscaping. Although it has an open character, it is not part of the wider countryside. Therefore the whole site is capable of being released from the Green Belt.</p> <p>We note that an uncertain minor negative rating has been given for the site against SA Objective 6, which relates to landscape. The site is well enclosed, with development on four sides, to the north and east of the site and bordering the site to the south and west. The site is therefore more closely associated with the existing built form in West Malling than it is with the open countryside further out to the south and west of the site. The site is effectively within the confines of West Malling and development of the site would establish a more defensible settlement boundary. We suggest therefore that landscape impact of developing this site would in fact be negligible.</p> <p>A landscape appraisal for the site undertaken by Murdoch Wickham Associates is provided at Appendix 3.</p> <p>Heritage</p> <p>A Heritage Statement (see Appendix 4) identifies that the site does not contain any designated or non-designated heritage assets. There are several sections of the site that are adjacent to the West Malling Conservation Area (WMCA). There are also a number of heritage assets present in the surrounding area such as the Grade II* St. Mary the Virgin Church, Grade II* listed Douces Manor and three non-designated historic buildings in Lindum House, St. Marys Church Centre and Oast House, all of which lie to the north-east, east and south east of the site. However, the intervisibility between the site and these assets is limited with strong vegetated boundaries.</p> <p>The critical and most sensitive views to the above assets are from Leonard Street (to the east of the site) and from the centre of West Malling itself. As such, the heritage assessment has concluded that there will be no material harm to any heritage asset resulting from the proposed development and therefore this would not be a constraint to an allocation.</p> <p>The Council's SA Objective 7 is scored with an uncertain significant negative due its proximity to these heritage assets. For the reasons outlined above, there will be no material harm to any of the designated heritage assets or non-designated historic buildings resulting from the development and the impact would be negligible (or, at worst, minor negative in the absence of a detailed assessment of the development proposals).</p> <p>In relation to archaeology, there is some potential on the site. However, as no remains of national significance are anticipated at the</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>site, it is suggested that any further mitigation could follow the grant of planning permission.</p> <p>Ecology</p> <p>The site is not subject to any statutory or non-statutory nature designations. A Phase 1 Habitat Survey conducted for the site by Hankinson Duckett Associates (see Appendix 5) identified that there was no evidence of protected species being located at the site. There are no further surveys required at this time.</p> <p>However further bat, badger and reptile surveys will be undertaken as part of an application for development of the site.</p> <p>SA Objective 5 is scored as an uncertain significant negative due to 'The site containing an existing green infrastructure asset'. We would question the accuracy of this description and rating as the site is a field with short grass that contains a small tree belt consisting of approximately a dozen small trees, and it is inaccessible to the public. Whilst we accept the development of the site would result in the loss of undeveloped land we would suggest that the site could have more public amenity value as an attractive new addition to West Malling and the loss of the existing field would therefore not be significantly negative.</p> <p>Flooding & Drainage</p> <p>The Environment Agency Flood Maps show the site to be entirely within Flood Zone 1 meaning it is at the lowest risk of flooding.</p> <p>A minimal extent of the site to the north-east is found to be located within a 1 in 30 year risk of surface water flooding, as is shown within the Flood Risk Assessment (see Appendix 6). However, this covers very little of the site and there is the potential to use sustainable drainage within any future development of the site to ensure that the risk of flooding from surface water is fully mitigated. The SA assesses the site as significant negative in relation to flooding and as highlighted in our questionnaire response this appears to be inaccurate given the small proportion of the site affected by surface water flooding and the potential for mitigation.</p> <p>Agricultural Land Classification</p> <p>SA Objective 9 is scored as an uncertain significant negative due to the site containing significant proportion of good to moderate grade 3 agricultural land. Whilst this is correct based on Provisional Agricultural Land Classification (ALC) mapping, the scoring system does not take into account practicality of the land being farmed for agricultural purposes. The site is almost entirely enclosed by built form, is disjointed from any other wider land holding and is of a size that could not commercially or practically be farmed, without being unviable or causing harm to the residential area within which it sits.</p> <p>Overall there are no technical or environmental issues that would prohibit development, including in relation to the impact of development on West Malling Conservation Area, highways, landscape, ecology, flooding and agricultural land considerations.</p>	

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>We consider that the assessment of the site within SA would benefit from review as it appears to be incorrect, particularly in terms of SA Objectives 2, 8, and 9.</p> <p>The site is evidently suitable, available and achievable for development in the first five years of the Local Plan and, given its limited contribution to Green Belt purposes, we consider that it should be allocated.</p> <p>I hope that this information is of assistance in terms of your site assessment and selection work for the new Local Plan. We look forward to discussing this site further in due course.</p>	
42635169	General	<p>* The SA Objective 1 appears to be based on out-of-date information. Since the West Mallig GP surgery closed a couple of years ago, the nearest GP surgery is over 2kms away (as the crow flies) and not within 800m as set out in the assessment. Walking to that surgery is not practical; it would involve walking along roads with no footpaths where heavy lorries operate (Teston Road) and crossing a main Trunk Road with no pedestrian crossing facilities.</p>	<p>The GP surgeries data used to inform the Interim SA Report included West Mallig GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated.</p>
44667809	General	<p>59699. 59714, 59716 Under your SA Objective 1 (the improvement to human health and wellbeing), you say the site is within 800m of an existing healthcare facility. This is not true so must be old information as we no longer have a surgery in West Mallig. It is now going to be luxury flats</p>	<p>The GP surgeries data used to inform the Interim SA Report included West Mallig GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated.</p>
42919937	General	<p>[name redacted] [address redacted] [Telephone no. redacted] [Email addresses redacted] To Whom it May Concern, TMBC Local Plan - Regulation Plan 18 Objection to Site 59432 for Residential Development We strongly object to the residential development of - Site 59432 Leybourne, West Mallig. Location The 'Medway Gap' which includes Leybourne and West Mallig is overpopulated. Little by little areas of precious green space will disappear in this urban oversaturated community. It would not be beneficial to the residents to build it up further and create a concrete jungle. This green open space is important for the wellbeing of residents especially children and families who love to use this area as a recreational space. West Mallig Group Practice (our existing healthcare facility) is struggling to cope with overcapacity along with our local primary school and local roads. Whilst it is understood that there is a need to provide housing, new residences should be spread out over new, sites, in unsaturated areas far away from the Medway Gap which is</p>	<p>With regard to SA objective 1: health and wellbeing, the SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The SA acknowledges that the site contains Willow Mead open space that could be lost as a result of development and so for this reason site 59432 receives an uncertain significant negative effect (as part of a mixed effect) in relation to this objective.</p> <p>With regard to schools, the site assessment criteria in Appendix D of the Interim SA Report acknowledge that "The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils" [emphasis added]. Therefore, all sites that are recorded as falling within close proximity of a school receive some uncertainty, as school capacity is unknown.</p> <p>The SA is too high-level to consider traffic levels and so the Council will commission additional evidence on matters including traffic.</p> <p>With regard to SA objective 2: services and facilities, site 59432 is recorded in the Urban Capacity Study (July 2022) as falling within the Very Good Accessibility Band and therefore receives a minor positive effect in relation to this objective. This objective does not consider the capacity of existing services and facilities.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59432 is recorded as having a significant negative effect. All negative effects are recorded as uncertain, as there may be opportunities to promote</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>overly built-up. This would provide more of a balance when providing new housing. A suitable supply of housing including a mix of sizes, types and tenures could be provided on those new sites along with new schools and healthcare facilities. Building houses on small green spaces seems to defeat the object where a mix of housing will be limited and would not tie in with the houses in this area which were built in the 1980s.</p> <p>Infrastructure/Parking/Noise/Pollution</p> <p>TMBC's overriding priority in the local plan should be to concentrate on improving the infrastructure by building new schools and GP surgeries along with improving local roads to ease congestion.</p> <p>Residents of Willowmead and Oxley Shaw Lane contend with excess traffic and noise during the day and night.</p> <p>Parking is an issue notably in Willowmead. Individuals tend park their vehicles dangerously, obscuring vision from driveways and the roadside which is made much worse at the local primary school's pick up and drop off time.</p> <p>This traffic problem will worsen if this green space is turned into a residential area, new residents and their visitors will park in Willowmead adding to noisy roads & increasing pollution.</p> <p>Comments on TMBC's Objectives Relative to Site 59432:</p> <p>SA Objective 1: to improve human health and well-being</p> <p>The local healthcare facility is oversaturated with patients which indicates that we are overwhelmed with residents in this area so building houses on this site would not improve human health and well-being. It would take away the beautiful green space that local children and families use which contribute to well-being. Other features such as a cycle path/play area/sports facility may be lost to a new development.</p> <p>SA Objective 2: To improve equality and access to community facilities and services</p> <p>This site is placed within a very good accessibility to community facilities and services, but our community is oversaturated, and a new development would result in more people needing to use the facilities.</p> <p>SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and sectors of society.</p> <p>Although the proposed site is within 800m of an existing primary school, capacity is limited as it is one form entry. Therefore, levels of educational attainment and skills and training development for all age groups and sectors of society would not be improved.</p> <p>SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough.</p>	<p>habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.</p> <p>Site 59432 is recorded as having an uncertain significant negative effect in relation to SA objective 6: landscape and townscape as it contains open space that could be lost as a result of development, although this is uncertain. All adverse effects against this objective are recorded as uncertain, as the actual effects will depend on the final design, scale and layout of development.</p> <p>Site 59432 receives a minor negative effect in relation to SA objective 7: heritage, due to its proximity to numerous heritage assets. All effects against SA objective 7 are recorded as uncertain, as the actual effects are dependent on the final design, scale and layout of development, and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>With regard to SA objective 8: water, the site receives an uncertain significant negative effect as it contains land with a 1 in 30 year risk of surface water flooding in addition to falling within Source Protection Zone 3.</p> <p>The comment on SA objective 9: soil relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 10: climate change mitigation, the SA is limited in how it can assess climate change mitigation as this is dependent on numerous factors. The proximity of development sites to sustainable transport links is considered a suitable proxy for assessing climate change mitigation, as proximity to sustainable transport links has the potential to affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour.</p> <p>With regard to SA objective 11: climate change adaptation, we state in the proforma for this site that "The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10".</p> <p>With regard to SA objective 12: air quality, sites only receive a significant negative effect when they are within 100m of an Air Quality</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>As TMBC states, the location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities.</p> <p>SA Objective 5: To protect and enhance biodiversity and geodiversity</p> <p>The site is within 250m of one or more nationally designated biodiversity sites.</p> <p>Building houses here will not protect and enhance biodiversity and geodiversity. There is currently a project in progress on this green space where the County Council is finding ways to get trees to grow with the aim of maximizing benefits for people, wildlife, and the climate. This project is funded by Defra and running in partnership with Natural England, Tonbridge and Malling Borough Council and Medway Valley Countryside Partnership. If new houses were built within this area, they would block out natural light, cause extra pollution and noise which would not encourage wildlife and trees to grow or the project would have to be removed altogether to accommodate extra houses. There is wildlife that inhabits the field & surrounding habitats which would be lost.</p> <p>SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality.</p> <p>New buildings would result in the loss of a beautiful open space and no matter what the design and would not fit in with existing housing. Developing this site would not enhance the borough's landscape and townscape character and quality.</p> <p>SA Objective 7: To protect and enhance the cultural heritage</p> <p>New buildings, no matter what the design, would not fit in with existing 1980s housing. There would probably not be lines of sight between the development site and nearby heritage assets which your objective states 'is 250m-1km away'.</p> <p>SA Objective 8: To protect and enhance the quality of water features and resources</p> <p>As stated in TMBC's Objective 8, 'the site will be within Flood Zone 3 and in an/or within an area with a 1 to 30 risk of flooding'. There is a water inlet/outlet that leads to the lake opposite which will be right next to the site giving a higher potential for flooding.</p> <p>SA Objective 9: To conserve and enhance soil resources and guard against land contamination</p> <p>As stated by TMBC 'The site is greenfield land and contains a significant proportion of grade 3 agricultural land'. If new houses are built how will the soil resources be conserved and enhanced, and the land be guarded against contamination?</p> <p>SA Objective 10: To reduce greenhouse gas emissions so as to minimize climate change.</p> <p>Greenhouse gas emissions will increase and not be reduced. Leybourne is situated between the A20 and M20 and air quality is questionable. Although there is a train station close by, people will still</p>	<p>Management Area (AQMA). Site 59432 is not within 100m of an AQMA.</p> <p>The comment on SA objective 13: material assets and waste relates more specifically to the Local Plan than it does the SA.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 of the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings".</p> <p>With regard to SA objective 4: economic growth, respondent has not expressed any disagreement over the effects given.</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>use their cars to commute to the station. People may drive to work locally or further afield as they are in easy reach of M20 and M26.</p> <p>SA Objective 11: To improve adaptation to climate change so as to minimize its impact</p> <p>As TMBC stated in Objective 11 'sustainable modes of transport' See comments in Objective 10 as linked to this.</p> <p>SA Objective 12:</p> <p>TMBC states that the site is not within 100m of an AQMA' even so, air quality will definitely decrease if more houses are built and more cars are used.</p> <p>SA Objective 13: To protect material assets and minimise waste.</p> <p>TMBC states that the site is within a 'Minerals Safeguarding Area' how will material assets and waste be minimised and protected if new houses are built?</p> <p>SA Objective 14: To provide a suitable supply of high-quality housing including an appropriate mix of sizes, types and tenures</p> <p>As TMBC have quoted 'This site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer a wider mix of housing. This site will not provide as wider mix of housing or make as greater contribution towards housing needs as a larger site would'.</p> <p>We invite you to visit our home (bordering this site) to verify that these objections are valid.</p> <p>Therefore, we strongly request that Tonbridge & Malling Borough Council to reconsider the development of this site.</p> <p>Should you require any additional information, clarification of any comments made, or would like to arrange a visit to our home; do not hesitate to contact us.</p> <p>Yours faithfully,</p> <p>Daniel & Kerry Hume</p> <p>Cc: Tom Tugendhat</p>	
42197025	General	<p>I am a resident of West Malling. Having looked at your site covering the local plan I could not find a means of commenting on specific sites that have been put forward. Therefore I have included my comments on site 59699 here in order of the SA objectives;</p> <p>Firstly this is grade 1 agricultural land within the greenbelt. If this development goes ahead then no greenbelt land is safe and the term greenbelt will have no future meaning. It would cause West Malling to sprawl westwards towards housing between the villages of West Malling and Offham, leaving a narrow gap between the villages and aiding coalescing of the villages. It is outside the boundary of West Malling. This site was not included in the previous local plan as it was deemed to be unviable.</p>	<p>The SA acknowledges the site as comprising best and most versatile agricultural land under SA objective 9: soil. Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment.</p> <p>With regard to SA objective 1: health and wellbeing, the GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated, including site 59699.</p>

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		<p>SA1 This “significant +” assessment is incorrect. It claims to be close to a health care centre. In reality there is no longer a doctor’s surgery in West Malling (it closed recently) and new residents are asked to use the NHS phone number as their GP. Lucky ones are taken on by the already stretched King’s Hill practice.</p> <p>SA2 The assessment is given as a negative</p> <p>SA3 The claim is that the site is close to schools. These are already at maximum capacity so travel, most likely by car, would be required to other areas. There are no opportunities for training and skills development obvious in West Malling</p> <p>SA4 The distance to the train station is implied as being 800 metres. The actual distance measured from the western edge of the proposed development is 1 mile in a straight line, approx 1.25 miles by road.</p> <p>The distance to buses is given as 400 metres. The actual distance is 1100 metres in a straight line, possibly 1300 metres by road.</p> <p>Both these journeys would in reality be done by car due to the distance, overloading parking facilities.</p> <p>The development is not within walking distance of any shops, including the only supermarket in West Malling.</p> <p>The assessment claims 5 ha as employment development without explaining how this would be appropriate on greenbelt land.</p> <p>SA5 The site contains an existing green infrastructure asset which would be entirely lost. It is within 250 metres of one or more designated biodiversity or geodiversity sites.</p> <p>SA6 It does not enhance the borough’s landscape and townscape character, but detracts from it. This is due to the site being on high ground and it is therefore visible from afar.</p> <p>SA7 Far from enhancing and protecting cultural heritage, it is within 250 metres of a heritage asset. There will be a line of sight issue because the development site is on high ground.</p> <p>SA8 The site lies within flood zone 3</p> <p>SA9 Far from conserving soil resources this development is entirely on grade 1 and 2 agricultural land.</p> <p>SA10 This claims to be a minor positive effect but the distances used are completely wrong (see SA4). The result therefore is a serious negative effect as all residents will be forced to use a car to travel to shops, buses, trains, schools, recreation facilities and workplaces. None of the roads surrounding it are suitable for heavy traffic, one is a single track road (Fatherwell Road). Access to West Malling would be via the narrow roads within the “New Town” development adjoining the site.</p> <p>SA11,12 and 13 no positive effects</p>	<p>Site 59699 is correctly recorded as within 800m of a school, namely West Malling Church of England Primary School. Therefore, it correctly receives a minor positive effect in relation to SA objective 3: education. The effect is recorded as uncertain, as capacity at this school is unknown.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. All mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59699 is 5ha or more, it receives a significant positive effect in relation to this objective. With regard to access to public transport (also covered under SA objective 10: climate change mitigation), the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. The SA correctly acknowledges site 59699 as being within 400m of a bus stop.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59699 receives a significant negative effect. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p> <p>As site 59699 is located on the edge of West Malling, it receives a minor negative effect in relation to SA objective 6: landscape and townscape. This is because site options adjacent to the existing urban edge could be more easily integrated into existing built development.</p> <p>With regard to SA objective 7: heritage, 59699 receives a significant negative effect. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59699 is not located within Flood Zone 3. It receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>The SA also acknowledges that site 59699 contains best and most versatile agricultural land. For this reason, it receives a significant negative effect in relation to SA objective 9: soil.</p> <p>Site 59699 receives negligible effects against SA objectives 11: climate change adaptation and 12: air quality for this reasons outlines in the proforma. The site receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste for the reasons outlines in the proforma.</p> <p>With regard to SA objective 14: housing, the site receives an uncertain minor positive effect as it is proposed for mixed-use development and so would include some housing. The effect s recorded as uncertain as it is unknown how much of the space would be used for employment purposes.</p>

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		<p>SA14 Uncertain what kind of development would be proposed, but the site is too large and could swamp the resources and facilities of the area.</p> <p>The summary is that there are no positive effects of this development, all are neutral or negative</p> <p>I oppose this site being included in the local plan.</p>	
42557665	General	<p>I live in West Malling on Offham Road which is directly affected by the proposed site 59699 and would like to express my views on this development.</p> <p>Green Belt: site 59699 is situated within the Green Belt which was created to provide a protection ring around our historic town. It is essential that the Green Belt is protected so as to avoid village coalescing and West Malling and its neighbouring villages from becoming one sprawling mass of housing and industrial development which cannot be supported by its already fragile infrastructure.</p> <p>I will list my objections in order of SA objectives:</p> <p>SA1: Health Care Centre, indeed a 'significant assessment' but not positive as stated. The main local doctor surgery in West Malling closed sometime ago and the remaining more distant alternatives are oversubscribed and stretched beyond capacity. It is next to impossible to get an appointment, one has to physically go to Kings Hill, which calls itself "West Malling Group Practice", very early in the morning and queue up in all weathers to be seen or referred if you are lucky. The 'same day' telephone option and the online booking system are a lottery, Even if a new GP practice is conjured up in the near future it would only take some of the pressure off, not solve this dire problem for the community as a whole.</p> <p>SA2: given as a 'negative'</p> <p>SA3: it claims the site is close to schools, which could be a positive factor if only they were not already maxed out. Most of the secondary school children I know have to be driven to schools because they are not within walking distance and/or can't rely on the limited bus service which has recently become even more challenging due to the local transport cuts.</p> <p>SA4: the assessed distances and assumptions are incorrect.</p> <p>The train station is at best 1 mile away as the crow flies, 1.3 miles by road, and parking is already at capacity. There are no dedicated cycle lanes or car charging facilities so green solutions are unavailable. I have already mentioned the lack of regular bus service. The only supermarket on West Malling High Street is half a mile away and parking, again, is scarce.</p> <p>The assessment claims 'employment development' but it does not explain how this would be achieved in Green Belt land.</p> <p>Summing it up, the great majority of these extra journeys would in reality result in more car journeys, more congestion and pollution.</p>	<p>Green Belt is a policy designation and not an environmental or sustainability designation. Therefore, the purposes of Green Belt are not inherently sustainability issues and so not referred to in the SA. SA is a separate assessment process to Green Belt assessments and uses a different basis for assessment</p> <p>With regard to SA objective 1: health and wellbeing, the GP surgeries data used to inform the Interim SA Report included West Malling GP surgery. However, as the respondent has noted, this GP surgery is now closed. In the next iteration of the SA Report, the proformas for all sites affected will be updated, including site 59699. The SA does not take into consideration the capacity of medical centres which is more of a matter for plan-making and the Infrastructure Delivery Plan (IDP). The site assessment criteria for SA objective 1 do, however, acknowledge that "If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage" (paragraph D.6).</p> <p>Site 59699 is correctly recorded as within 800m of a school, namely West Malling Church of England Primary School. Therefore, it correctly receives a minor positive effect in relation to SA objective 3: education. The effect is recorded as uncertain, as capacity at this school is unknown.</p> <p>SA objective 4: economic growth considers whether development will directly influence sustainable economic growth. All mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites are expected to have more positive effects than smaller sites, as they will provide more opportunities for the creation of new jobs. As site 59699 is 5ha or more, it receives a significant positive effect in relation to this objective. With regard to access to public transport (also covered under SA objective 10: climate change mitigation), the SA states in the 'Difficulties and Data Limitations' section that distances in the appraisal were measured as straight-line distances from the edge of a site option to existing services and facilities. Therefore actual walking distances could be greater. The SA correctly acknowledges site 59699 as being within 400m of a bus stop.</p> <p>With regard to SA objective 5: biodiversity and geodiversity, site 59699 receives a significant negative effect. All effects against this objective are recorded as uncertain, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects.</p>

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		<p>SA5: The site is an existing green infrastructure asset which would be entirely lost. It is within 250 metres of one or more designated biodiversity or geodiversity sites.</p> <p>SA6: The proposed development would not enhance the borough's landscape and townscape character, but would detract from it. This is due to the site being on high ground, open green space, and it is therefore visible from afar. It is presently used as farm land with alternating crops intercalated with priceless natural vegetation and wildlife.</p> <p>SA7: Far from enhancing and protecting cultural heritage, it is within 250 metres of a heritage asset. There will be a line of sight issue because the development site is on high ground.</p> <p>SA8: Some of the site lies within Flood Zone 3</p> <p>SA9: any new development would NOT conserve soil resources because it is entirely proposed on Grade 1 and 2 Agricultural Land.</p> <p>SA10: This claims to be a minor positive but the distances used are incorrect (see my comments on SA4).</p> <p>The end result therefore is a seriously negative effect as new residents or users would be forced to use a car to travel to shops, trains, schools, recreation facilities and workplaces.</p> <p>None of the surrounding roads are suitable for heavy traffic, Fatherwell Road is a single track road and Offham Road is already compromised by the existing traffic.</p> <p>West Malling would be accessed through small residential streets within the "New Town" development adjoining the site where a bottle neck already provides congestion and opportunities for 'road age' where it joins with West Malling centre.</p> <p>There is no scope for building new roads or widening the country lanes due to the rural character of the area in question.</p> <p>Even now walking along these country roads is hazardous due to the traffic using Offham Road as an 'rat run'. As is, drivers don't respect the speed limits despite numerous blind corners, so this situation would only deteriorate if more traffic was channeled through these narrow roads.</p> <p>SA11, 12 and 13: listed as no positive effects.</p> <p>SA14: It is unclear what type of 'new development' is being proposed. Regardless of its nature the sheer scale of the 'mixed use' or purely housing development would have a detrimental effect on the environment, traffic, resources, character and facilities of the area.</p> <p>In my opinion this development proposal for site 59699 has no positive effects, it is completely unviable and I oppose it being included in the Local Plan.</p>	<p>As site 59699 is located on the edge of West Malling, it receives a minor negative effect in relation to SA objective 6: landscape and townscape. This is because site options adjacent to the existing urban edge could be more easily integrated into existing built development.</p> <p>With regard to SA objective 7: heritage, 59699 receives a significant negative effect. All effects against this objective are recorded as uncertain, as they depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p> <p>Site 59699 is not located within Flood Zone 3. It receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding.</p> <p>The SA also acknowledges that site 59699 contains best and most versatile agricultural land. For this reason, it receives a significant negative effect in relation to SA objective 9: soil.</p> <p>Site 59699 receives negligible effects against SA objectives 11: climate change adaptation and 12: air quality for this reasons outlines in the proforma. The site receives an uncertain minor negative effect in relation to SA objective 13: material assets and waste for the reasons outlines in the proforma.</p> <p>With regard to SA objective 14: housing, the site receives an uncertain minor positive effect as it is proposed for mixed-use development and so would include some housing. The effect s recorded as uncertain as it is unknown how much of the space would be used for employment purposes.</p>
43629217	General	<p>Site 59814 – West Malling</p> <p>Under SA Objective 3 (to improve levels of educational attainment and skills and training development), the site is considered to have an</p>	<p>All reasonable alternative development site options have been appraised on a 'policy-off' basis and so consideration has not been given to mitigation (e.g. financial contributions) and supporting</p>

Respondent ID	Section of the Reg 18 Interim SA Report	Comment	LUC Response
		<p>'Uncertain minor positive (+?) impact. The assessment notes that development could provide contributions to education. As previously stated, subject to CIL compliance, any education contributions sought by the Council will be secured via a S106 agreement to ensure suitable provision for new and existing residents.</p> <p>Under Objective 5 (to protect and enhance biodiversity and geodiversity), the site is rated as 'Uncertain significant negative (--?)'. The SA states that the site contains an existing green infrastructure asset that could be lost as a result of new development and that the effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>When considering this site in combination with the land to the north, the Public Right of Way on the site will be retained and enhanced to provide access to the wider countryside for new and existing residents. Biodiversity will also be enhanced on site through the provision of landscaping, native tree planting and SuDS on site increasing habitat creation on the site.</p> <p>Under SA Objective 6: To protect and enhance the borough's landscape and townscape character and quality, the site is rated as 'Uncertain significant negative (--?)'. The site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces. These effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>As previously highlighted, the appeal decision on the site to the north determined that there would not be significant harm to the landscape as a result of development in this location. Although the combined scheme would be larger and provide up to 105 dwellings, the any proposed development will be designed to minimise harm to the landscape with screening and buffers where appropriate.</p> <p>Under SA Objective 7 (to protect and enhance the cultural heritage resource), the site's impact is rated 'Uncertain significant negative (--?)' as the site is located within 250m of a heritage asset. Again, as with the site to the north, any harm to the setting of nearby heritage assets would be less than substantial. As such, the impact should be considered 'uncertain negative' to reflect that suitable mitigation will be provided.</p> <p>This view is confirmed by the Inspector in the aforementioned appeal, who at paragraph 24 states, 'having regard to the extent of harm, the number of assets and the significance of those assets I consider that together this would amount to "less than substantial harm" as set out in Paragraph 202 of the Framework.' The Inspector then later attributed greater weight to the provision of housing, including affordable housing.</p> <p>Under SA Objective 14 (to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types, and tenures), the site is considered to have a 'Minor positive (+)' impact as it is expected</p>	<p>documents submitted by site promoters. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites). If a site is allocated in a Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>Site 59814 is incorrectly recorded as containing a green infrastructure asset, as it slightly overlaps a green infrastructure asset. In the next iteration of the SA Report, the site will receive an uncertain minor negative effect in relation to this objective, as it is within 250m to 1km of a Local Wildlife Site.</p> <p>With regard to SA objective 14: housing, the site is appraised independently of other sites. Therefore, it is correct that it receives a minor positive effect.</p>

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		to provide fewer than 100 dwellings. The site is not intended to be delivered in isolation; once combined with the land to the north, approximately 105 homes could be delivered on site. In this regard, the site has the potential to have a significant positive impact.	
43629217	General	<p>The ISA determines that there is an 'Uncertain minor positive (+?)' impact of the site against SA Objective 3, which relates to improving levels of educational attainment and skills and training development. The assessment notes that development could provide contributions to education. Gladman would like to take this opportunity to confirm that, subject to CIL compliance, any education contributions sought by the Council will be secured via a S106 agreement to ensure suitable provision for new and existing residents.</p> <p>Under Objective 5 (to protect and enhance biodiversity and geodiversity), the site is rated as 'Uncertain significant negative (--?)'. The SA states that the site contains an existing green infrastructure asset that could be lost as a result of new development and that the effect is uncertain as it may be possible to conserve or even enhance the asset through the design and layout of the new development.</p> <p>Gladman disagree with this assessment and this representation confirms via the site submission that the Public Right of Way to the south of site will be conserved and enhanced as part of any future development package. All green infrastructure assets on site will be retained and enhanced to ensure the site is well screened with a suitable level of buffering.</p> <p>Under SA Objective 6 (to protect and enhance the borough's landscape and townscape character and quality), the site is rated as 'Uncertain significant negative (--?)'. The SA notes that the site is not located near any settlements in rural locations, and/or would result in the loss of designated open spaces, but these effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects.</p> <p>Gladman do not consider it appropriate to determine unknown impacts as 'significant' when the site does not impact settlements in rural locations, nor does it result in the loss of designated open space. Development at this location will be sympathetically designed to ensure that the scale and layout of the development mitigates any adverse effects. This is supported by appeal decision APP/H2265/W/20/3254563, which states at paragraph 33 that "due to the topography around the site, its development would have no notable impact on the wider landscape."</p> <p>Under SA Objective 7 (to protect and enhance the cultural heritage resource), the site's impact is rated 'Uncertain significant negative (--?)' as the site is located within 250m of a heritage asset. The effects are considered uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets.</p>	<p>Site 59807 like all other reasonable alternative development site options, has been appraised on a 'policy-off' basis. This means that consideration has not been given to mitigation. Instead, sites have been appraised on their physical constraints only. This ensures all sites are appraised to a consistent level of detail. Therefore, although the respondent has referred to financial contributions and other forms of mitigation, these will not be taken into consideration at this stage of the plan-making process. If the site is allocated in the Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p> <p>SA utilises a precautionary approach. Therefore, impacts can be significant but recorded as uncertain if they are dependent on other factors.</p> <p>The SA is too high-level to give consideration to previous applications for sites, including appeal decisions.</p> <p>Site 59807 receives a significant negative effect in relation to SA objective 8: water, as it contains land with a 1 in 30 year risk of surface water flooding. The 25% threshold only applies to Flood Zones 2 and 3.</p> <p>With regard to SA objective 14: housing, all residential site options are expected to have positive effects on this objective due to the nature of the proposed development. Paragraph D.33 in the Interim SA Report states "The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings". Site 59807 is still expected to have a positive effect in relation to this objective, albeit minor.</p>

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		<p>Gladman disagree with the potential for significant negative impacts on a heritage asset and take the opportunity to confirm that the site can be designed and delivered in a way that is sensitive to the conservation considerations. Gladman recognise that there is the potential for minor negative impacts on the wider setting of St Mary's Abbey Complex, the Church of St Mary the Virgin, The Lavenders, St Leonards Tower and West Malling Conservation Area, however, this would amount to less than substantial harm (at the lower end of the spectrum) as defined by the NPPF.</p> <p>Under SA Objective 8 (to protect and enhance the quality of water features and resources), the site is considered to have 'Significant negative (--) / Negligible (0)' impacts. This considers that the site is either entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30-year risk of surface water flooding and that the site does not contain a water body or watercourse or fall within a Source Protection Zone. However, the site is not within Flood Zone 3 (see Figure 1) and the small area of surface water flood risk along the north-western boundary does not constitute over 25% of the site (see Figure 2)3.</p> <p>Further, as concluded by the Flood Risk Assessment carried out by Enzygo in support of planning application ref. 19/02856/OA, the development of the site can be achieved with minimal risk from flooding and without increasing flood risk elsewhere.</p> <p>Therefore, Gladman consider the significant negative assessment to be inappropriate and should be considered negligible at the very most.</p> <p>Under SA Objective 14 (to provide a suitable supply of high-quality housing including an appropriate mix of sizes, types, and tenures), the site is considered to have a 'Minor positive (+)' impact as the site is expected to provide fewer than 100 dwellings. It is expected that these smaller sites will not be able to offer as wider mix of housing or making as greater contribution towards local housing needs as larger sites would.</p> <p>Gladman disagree that the contribution of up to 75 dwellings, of which 40% will be affordable, should be considered 'minor positive'. Smaller development sites are essential to ensuring a range of housebuilders can operate in an area at one time, boosting the supply of housing across the plan period. Gladman consider that the delivery of up to 75 dwellings, on a site located outside the Green Belt and AONB in a significantly constrained authority, should be considered a significant positive.</p> <p>Furthermore, Gladman are promoting the parcel of land immediately south of this site which in combination, could provide circa 105 units. This larger site therefore has the potential to meet the >100-unit threshold to ensure a 'significant positive' contribution to local housing needs.</p>	

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25366913	General	<p>8.1 Berkeley generally agrees with the methodology and findings of the Interim Sustainability Appraisal (ISA), except for some site-specific matters, which are explored in response to question 8.</p> <p>8.2 The ISA has assessed the options presented in the consultation document and demonstrates that there are advantages and disadvantages to each. As further work is undertaken in narrowing the strategic policy, and spatial strategy, options there will, of course, need to be further analysis through the SA process.</p> <p>8.3 As highlighted in Berkeley's responses to questions 5 and 6, further and more detailed analysis of housing needs is necessary and more uplift options will need to be justified and tested through the SA.</p> <p>9.1 In response to this question Berkeley has focused on the assessment of its site at Broadwater Farm (site ID: 59740).</p> <p>9.2 Berkeley does not agree with the findings for Broadwater Farm (site ID:59740). The findings in the Interim SA are by definition high level and preliminary in nature. In contrast, Berkeley has carried out a detailed, site-specific Environmental Impact Assessment (EIA) in support of its live planning application (LPA Ref. 21/02719/OAEA). The conclusions of that assessment were as follows:</p> <p>"An EIA has been undertaken for the proposed development in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As a result, we have been able to demonstrate that with appropriate mitigation designed into the proposals (during the construction and operational stages of the proposed development), almost all of the potentially adverse effects identified can be appropriately mitigated for or reduced to a level which is not significant in EIA terms.</p> <p>A significant beneficial socio-economic impact is anticipated to arise from the proposed development due to providing for identified housing need, labour supply, increase expenditure and improved healthcare and education provision.</p> <p>As demonstrated by the technical work undertaken there are no significant technical constraints that would preclude the development or harm deliverability. It has been demonstrated that whilst the development would give rise to some adverse impacts, mitigation measures have been proposed to minimise them."</p> <p>9.3 The detailed assessment work that sits behind these conclusions is a much better and more thorough indicator of Broadwater Farm's suitability for a strategic level of housing-led development and has led to agreement between Berkeley and the Council, in the context of the planning application, that development at Broadwater farm is sustainable, suitable for development, available and deliverable.</p> <p>9.4</p> <p>Broadwater Farm (site ID: 59740)</p> <p>9.5 The site is located to the north of Kings Hill in Tonbridge & Malling Borough and extends to approximately 118.5 hectares. The site is in</p>	<p>The assessed need + 10% was appraised as a basis for considering a higher growth scenario as there was not evidence to base specific higher growth figures on.</p> <p>All reasonable alternative development site options have been appraised on a 'policy-off' basis and so consideration has not been given to mitigation and supporting documents submitted by site promoters. This ensures all sites are appraised to the same level of detail (specific development proposals may not yet have been determined for a number of sites). If a site is allocated in a Local Plan via policy that contains mitigation measures, it will be appraised on a 'policy-on' basis.</p>

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		<p>the sole control of Berkeley. This control by a single developer is particularly important in terms of demonstrating the deliverability of development on the site within the plan period.</p> <p>9.6 In summary, and based on the submitted application plans and supporting documents, development at Broadwater Farm can deliver:</p> <ul style="list-style-type: none"> • Housing: Berkeley expects to be able to deliver 900 homes within the new Local Plan period, and these will be high-quality bespoke designed homes including 30% affordable housing. • Sustainability: a range of measures that will assist in mitigating climate change; both in the layout of the development and the construction of dwellings. Working with existing water flows to create a new waterscape that works in harmony with the landscaping and creates new habitats. • Community: community infrastructure including a GP surgery, primary school, and secondary school. The secondary school in particular would serve the wider area (Kings Hill currently has no secondary school). • Green Infrastructure: a broad and diverse range of green infrastructure including parkland, woodland, small village greens and squares, children's play spaces, and sports pitches. • Heritage: a scheme that has been conceived on the basis of a detailed understanding of the constraints of the site, including the particular significance of the identified heritage assets within the site and surrounding area, including the contribution that is made by setting (including the site). • Biodiversity: a significant net gain in biodiversity comprising a mix of new and improved habitats. • Highways: Local road improvements, including new and improved pedestrian, cycle, and equestrian links to existing public rights of way providing access to the countryside. • Economy: new employment opportunities, training, and investment in the local economy. 	