



Sustainability Appraisal

Scoping Report

Local Plan

Tonbridge and Malling Borough Council

Final report post-consultation

Prepared by LUC

June 2025

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Chapter 1

Introduction

1.1 Tonbridge and Malling Borough Council (TMBC) commissioned LUC in March 2022 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the emerging new Tonbridge and Malling Local Plan. Following the change in Government in July 2024 and the proposed significant changes to national planning policy, TMBC put the Local Plan-making process on hold. The plan-making process is now restarting and, due to the time that has passed since the original SA Scoping Report (January 2022) was prepared and consulted upon, and the changes to national policy, guidance and legislation, TMBC has re-consulted on the scope of the SA with the statutory consultees (the Environment Agency, Natural England and Historic England) between May and June 2025. This is the final post-consultation SA Scoping Report.

1.2 SA/SEA is an assessment process designed to consider and communicate the significant sustainability issues and effects of emerging plans and policies within them, including their alternatives. SA/SEA iteratively informs the plan-making process by helping to refine the contents of plans, so that they maximise the benefits of sustainable development and avoid, or at least minimise, the potential for adverse effects.

1.3 The purpose of this Scoping Report is to provide the context for, and determine the scope of, the SA of the new Tonbridge and Malling Local Plan and to set out the framework for undertaking the later stages of the SA.

1.4 The Scoping stage of SA involves:

- Reviewing other plans, policies and programmes.
- Considering the current state of the environment, as well as social and economic factors in the plan area (in this case Tonbridge and Malling Borough).

- Identifying any key environmental, social and economic issues which may be affected by the new Local Plan.
- Setting out the 'SA framework', which comprises specific sustainability objectives against which the likely effects of the Local Plan can be assessed.

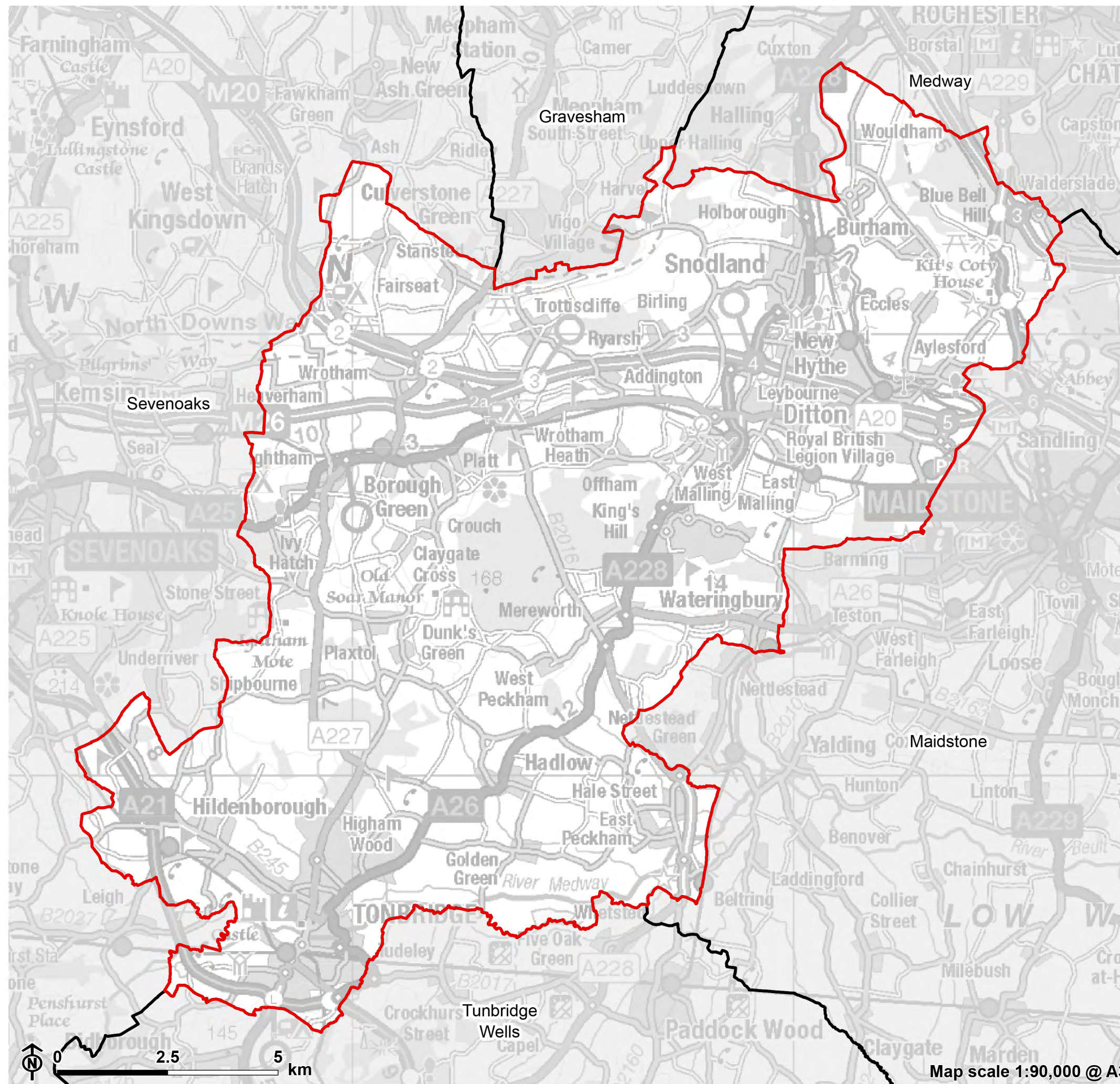
The Local Plan area

1.5 Tonbridge and Malling Borough is one of 12 district council areas within the county of Kent in South East England. The population of Tonbridge and Malling is approximately 135,206 people. The borough is bordered by Sevenoaks to the west, Tunbridge Wells to the south, Maidstone to the east and Gravesham and Medway to the north. Most of the borough is rural in character, with several villages and small towns. The main town within the borough is Tonbridge including Hilden Park, with further built-up areas including Borough Green, Kings Hill, Snodland and Ham Hill, and the Medway Gap. The location of Tonbridge and Malling Borough is presented in Figure 1.1 below.

1.6 The borough benefits from its proximity to London and the South East coast. There are three main railway lines (Kent Downs Line, Medway Valley Line and South Eastern Main Line) that pass through the borough, providing access to London, Sevenoaks, Maidstone, Strood, Aylesford, Ashford, Dover, Ramsgate via Canterbury West and Hastings via Tunbridge Wells, in addition to other towns and villages in-between these settlements. The Channel Tunnel Rail Link is channelled under the Kent Downs. Within the borough there are various strategic key routes, including the A20, M20, A21, A227, A228, M2, A25, A26, A229 and M26. These roads connect the borough to wider transport networks including the M25 motorway and channel ports. Tonbridge and Malling Borough includes the Kent Downs National Landscape (formerly referred to as an Area of Outstanding Natural Beauty or AONB) in the north, and the High Weald National Landscape in the south. The majority of the borough is designated as Green Belt. There are also several international, national and local environmental designations.

Figure 1.1: Location of Tonbridge and Malling Borough

- Tonbridge and Malling boundary
- Neighbouring local authority



Tonbridge and Malling Local Plan

1.7 The Council's current Development Plan consists of the following plans, which cover the period to 2021:

- Core Strategy 2007-2021 (adopted September 2007);
- Development Land Allocations DPD (adopted April 2008);
- Tonbridge Central Area Action Plan (adopted April 2008);
- Managing Development and the Environment DPD (adopted April 2010);
- Kent Minerals and Waste Local Plan 2013-2030 (adopted September 2016); and
- Kent Minerals and Waste Local Plan 2013-2030 as amended by the Early Partial Review 2020 (adopted September 2020).

1.8 The Development Plan also comprises the Saved Policies document (April 2010) of the Tonbridge and Malling Borough Local Plan (1998). With the exception of the Kent Minerals and Waste Local Plan, the current suite of adopted development plan documents that make up the Development Plan date back to 2007-2010 and have a time horizon of 2021. These plans pre-date current national policy and practice guidance, and local evidence.

1.9 Therefore, TMBC does not have an up-to-date plan in place and is in the process of preparing a new Local Plan, with a view to submitting it for Examination to meet the Government's timeframe of December 2026.

1.10 The Council previously prepared and submitted a new Local Plan for Examination in January 2019. The plan was withdrawn in July 2021, in response to the appointed Planning Inspector's findings.

1.11 Following withdrawal of this Local Plan, the Council recommenced plan-making in Autumn 2021. An early Regulation 18 Local Plan consultation was

undertaken from September to November 2022. Following this, the Council had been working on a second Regulation 18 Local Plan.

1.12 Following the general election in July 2024, the new Labour Government proposed significant reforms to the NPPF, which were consulted upon from July to September 2024, alongside other planning reforms. Given the extent of changes proposed, the Council paused its plan-making process until the new NPPF was published in December 2024. Work has now commenced on preparing a new Regulation 18 Local Plan which will be subject to public consultation later in 2025.

1.13 Once adopted, the new Local Plan, alongside the Kent Minerals and Waste Local Plan documents, and any forthcoming Neighbourhood Plans will form the Development Plan for the borough and be at the heart of the local planning framework. The Local Plan is a borough-wide plan that will coordinate the development and growth requirements of the borough to 2042.

Sustainability Appraisal and Strategic Environmental Assessment

1.14 Under the amended Planning and Compulsory Purchase Act 2004 [See reference 1], SA is mandatory for Development Plan Documents. For these documents, it is also necessary to conduct an environmental assessment in accordance with the requirements of the SEA Directive (European Directive 2001/42/EC), as transposed into law in England by the SEA Regulations [See reference 2] and which remains in force despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the Tonbridge and Malling Local Plan to be subject to SA and SEA throughout its preparation.

1.15 In October 2023, the Levelling Up and Regeneration Bill received royal assent. The Levelling-up and Regeneration Act 2023 outlines a number of reforms to the planning system, including the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR).

The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Local Plan is prepared.

1.16 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the national Planning Practice Guidance [See reference 3]), whereby users can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken in Tonbridge and Malling Borough. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Regulations’.

1.17 The SA process comprises a number of stages, with Scoping being Stage A as shown below:

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.
- Stage B: Developing and refining options and assessing effects.
- Stage C: Preparing the SA Report.
- Stage D: Consulting on the Local Plan and the SA Report.
- Stage E: Monitoring the significant effects of implementing the Local Plan.

1.18 The emerging Local Plan will be subject to SA at each stage of its development.

Habitats Regulations Assessment

1.19 The requirement to undertake a Habitats Regulations Assessment (HRA) of development plans was confirmed by the amendments to the Habitats Regulations published for England and Wales in July 2007, updated in 2010 and again in 2012 and 2017 [See reference 4]. The Regulations translate Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) and 79/409/EEC (Birds Directive) into UK law and remain a legal requirement despite the UK exiting the European Union.

1.20 The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European site and to ascertain whether it would adversely affect the integrity of that site, either alone or in combination with other plans or projects.

1.21 The HRA of the Tonbridge and Malling Local Plan will be undertaken separately but the findings will be taken into account in the SA where relevant (for example to inform judgements about the likely effects of potential development locations on biodiversity).

Approach to Scoping

1.22 There are five tasks involved at the Scoping stage of SA:

- Stage A1: Setting out the policy context for the SA of the Tonbridge and Malling Local Plan (i.e. key Government policies and strategies that influence what the Local Plan and the SA need to consider).
- Stage A2: Setting out the baseline for the SA of the Local Plan (i.e. the current and likely future environmental, social and economic conditions in Tonbridge and Malling Borough).

- Stage A3: Drawing on A1 and A2, identify the particular sustainability problems and/or opportunities ('issues') that the Local Plan and the SA should address.
- Stage A4: Drawing on A1, A2 and A3, develop a framework of SA objectives and assessment criteria to appraise the constituent parts of the Local Plan in isolation and in combination.
- Stage A5: Consultation on the scope of the SA.

1.23 This Scoping Report fulfils the requirements set out above with a view to establishing the likely significant effects of constituent parts of the Local Plan both in isolation and in combination. In accordance with national Planning Practice Guidance (PPG), published online by the Government, the Scoping Report should be proportionate and relevant to the Local Plan, focussing on what is needed to identify and assess the likely significant effects.

Meeting the requirements of the Strategic Environmental Assessment Regulations

1.24 The relevant sections of the Scoping Report that are considered to meet the SEA Regulations requirements are signposted below (the remainder will be met during subsequent stages of the SA of the Tonbridge and Malling Local Plan). This information will be included in the full SA Report at each stage of plan-making to show how the requirements of the SEA Regulations have been met throughout the SA process.

1.25 The SEA Regulations [\[See reference 5\]](#) require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this case will comprise the SA report. The report shall identify, describe, and evaluate the likely significant effects on the environment of the following

(requirements in green shaded text and where each requirement is met is provided in bullets below):

An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

- Covered in Chapter 1, Chapter 2 and Appendix A.

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

- Covered in Chapter 3.

The environmental characteristics of areas likely to be significantly affected.

- Covered in Chapter 3.

Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017).

- Covered in Chapter 3 and Chapter 4.

The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

- Covered in Chapter 2 and Appendix A.

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as – (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).

- Requirement will be met at a later stage in the SA process.

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

- Requirement will be met at a later stage in the SA process.

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

- Requirement will be met at a later stage in the SA process.

A description of the measures envisaged concerning monitoring in accordance with regulation 17.

- Requirement will be met at a later stage in the SA process.

A non-technical summary of the information provided under paragraphs 1 to 9 [of Schedule 2 of the SEA Regulations].

- Requirement will be met at a later stage in the SA process.

The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:

- current knowledge and methods of assessment;
- the contents and level of detail in the plan or programme;
- the stage of the plan or programme in the decision-making process; and
- the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

- Regulation 12(3)

- This Scoping Report and future environmental reports will adhere to this requirement.

In terms of consultation, the SEA Regulations require that:

- When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.

- Regulation 12(5)

- This Scoping Report was published for consultation with the three statutory bodies (the Environment Agency, Historic England and Natural England) between May and June 2025. The report has now been updated in response to the comments received.

Every draft plan or programme for which an environmental report has been prepared in accordance with regulation 12 and its accompanying environmental report (“the relevant documents”) shall be made available for the purposes of consultation in accordance with the following provisions of this regulation.

As soon as reasonably practical after the preparation of the relevant documents, the responsible authority shall:

- Send a copy of those documents to each consultation body;
- Take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive (“the public consultees”);
- Inform the public consultees of
 - the address of the website at which the relevant documents may be viewed and downloaded free of charge;
 - the fact that a copy of the relevant documents may be obtained by email from the responsible authority;
 - the fact that a copy of the relevant documents may be obtained by post from the responsible authority, provided that it is reasonably practicable for the authority to provide a copy by post;
 - the address, email address and telephone number for the purpose of requesting a copy of the relevant documents either by email or by post;

- whether a charge will be made for copies of the relevant documents provided by post and the amount of any charge; and
- the telephone number which can be used to contact the responsible authority for enquiries in relation to the relevant documents;

The period referred to in paragraph (2)(d) must be of such length as will ensure that the consultation bodies and the public consultees are given an effective opportunity to express their opinion on the relevant documents.

- Regulation 13(1)(2)(3)

- Public consultation on the Local Plan and accompanying SA Reports will take place as the Local Plan develops. The intended programme and key stages for plan preparation are set out in the Local Development Scheme.

Where a responsible authority, other than the Secretary of State, is of the opinion that a plan or programme for which it is the responsible authority is likely to have significant effects on the environment of a Member State, it shall, as soon as reasonably practicable after forming that opinion:

- notify the Secretary of State of its opinion and of the reasons for it; and
- supply the Secretary of State with a copy of the plan or programme concerned, and of the accompanying environmental report.

- Regulation 14(1)

- Unlikely to be relevant to the Tonbridge and Malling Local Plan, as there will be no effects beyond the UK.

1.26 In terms of taking the SA Report and the results of the consultations into account in decision-making, the SEA Regulations require (relevant extracts of Regulation 16):

As soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out under these Regulations, the responsible authority shall:

- publish the plan or programme, as adopted, its accompanying environmental report and a statement containing the particulars specified in paragraph (4) (“the relevant adoption documents”) on a public website at which the documents may be viewed and downloaded free of charge;
- provide a copy of the relevant adoption documents by email to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request;
- provide one copy of the relevant adoption documents by post to any person who requests a copy, as soon as reasonably practicable after receipt of that person’s request, unless it is not reasonably practicable to provide a copy by post for reasons connected to the effects of coronavirus, including restrictions on movement;
- make available a telephone number for the public to make enquiries in relation to the relevant adoption documents.

- Regulation 16(1)

- Requirement will be met at a later stage in the SA process.

As soon as reasonably practicable after the adoption of a plan or programme: (a) the responsible authority shall inform: (i) the consultation bodies; (ii) the persons who, in relation to the plan or programme, were public consultees for the purposes of regulation 13; and (iii) where the responsible authority is not the Secretary of state, the Secretary of State,

that the plan or programme has been adopted, and a statement containing the following particulars:

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to – (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- how the results of any consultations entered into under regulation 14(4) have been taken into account;
- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- Requirement will be met at a later stage in the SA process.

1.27 The SEA Regulations also require that the responsible authority shall monitor the significant 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 (Regulation 17(1)). This requirement will be met after adoption of the Local Plan.

Structure of the Scoping Report

1.28 This chapter describes the background to the preparation of the Tonbridge and Malling Local Plan and the requirement to undertake SA. The remainder of this Scoping Report is structured into the following sections:

- Chapter 2 describes the other plans, policies and programmes of relevance to the SA of the Tonbridge and Malling Local Plan.

- Chapter 3 presents the baseline information which will inform the assessment of the policies and sites in the Local Plan.
- Chapter 4 identifies the key environmental, social and economic issues in Tonbridge and Malling Borough of relevance to the Local Plan and considers the likely evolution of those issues without its implementation.
- Chapter 5 presents the SA framework that will be used for the appraisal of the Local Plan and the proposed method for carrying out the SA.
- Chapter 6 presents the site assessment criteria that will be used for the appraisal of the Local Plan.
- Chapter 7 describes the next steps to be undertaken in the SA of the Local Plan.
- Appendix A sets out the international, national and sub-national plans, policies and programmes which are of most relevance to the Local Plan.
- Appendix B presents the comments received from statutory consultees on the version of the SA Scoping Report that was consulted upon between May and June 2025, and LUC's responses.

Chapter 2

Relevant plans and programmes

2.1 Schedule 2 of the SEA Regulations requires:

- An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans or programmes.
- The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

2.2 In order to establish a clear scope for the SA, it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national policies, plans and strategies that are of relevance to the Tonbridge and Malling Local Plan. Given the SEA Regulations requirements above, it is also necessary to consider the relationship between the Tonbridge and Malling Local Plan and other relevant plans, policies and programmes.

2.3 This chapter summarises the relationship of the Tonbridge and Malling Local Plan to the relevant international and national policies, plans and programmes, which should be taken into consideration during preparation of the plan and its SA, as well as those plans and programmes which are of relevance at a sub-national level. The objectives of these plans and programmes have been taken into account when updating the SA framework in Chapter 5. An outline of the content and main objectives of the Local Plan will be described in subsequent SA reports, as this emerges through the plan-making process.

The implications of Brexit

2.4 The UK left the EU at the end of January 2020. Principally, the UK's environmental law is derived from EU law or was directly effective EU law. As a result of Brexit, the European Union (Withdrawal) Act 2018 converts existing EU law which applied directly in the UK's legal system (such as EU Regulations and EU Decisions) into UK law and preserves laws made in the UK to implement EU obligations (e.g. the laws which implement EU Directive). This body of law is known as retained EU law and could be subject to future, post-Brexit amendments.

2.5 As set out in the Explanatory Memorandum accompanying the Brexit amendments [See reference 6], the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are made by this instrument to the way the SEA regime operates.

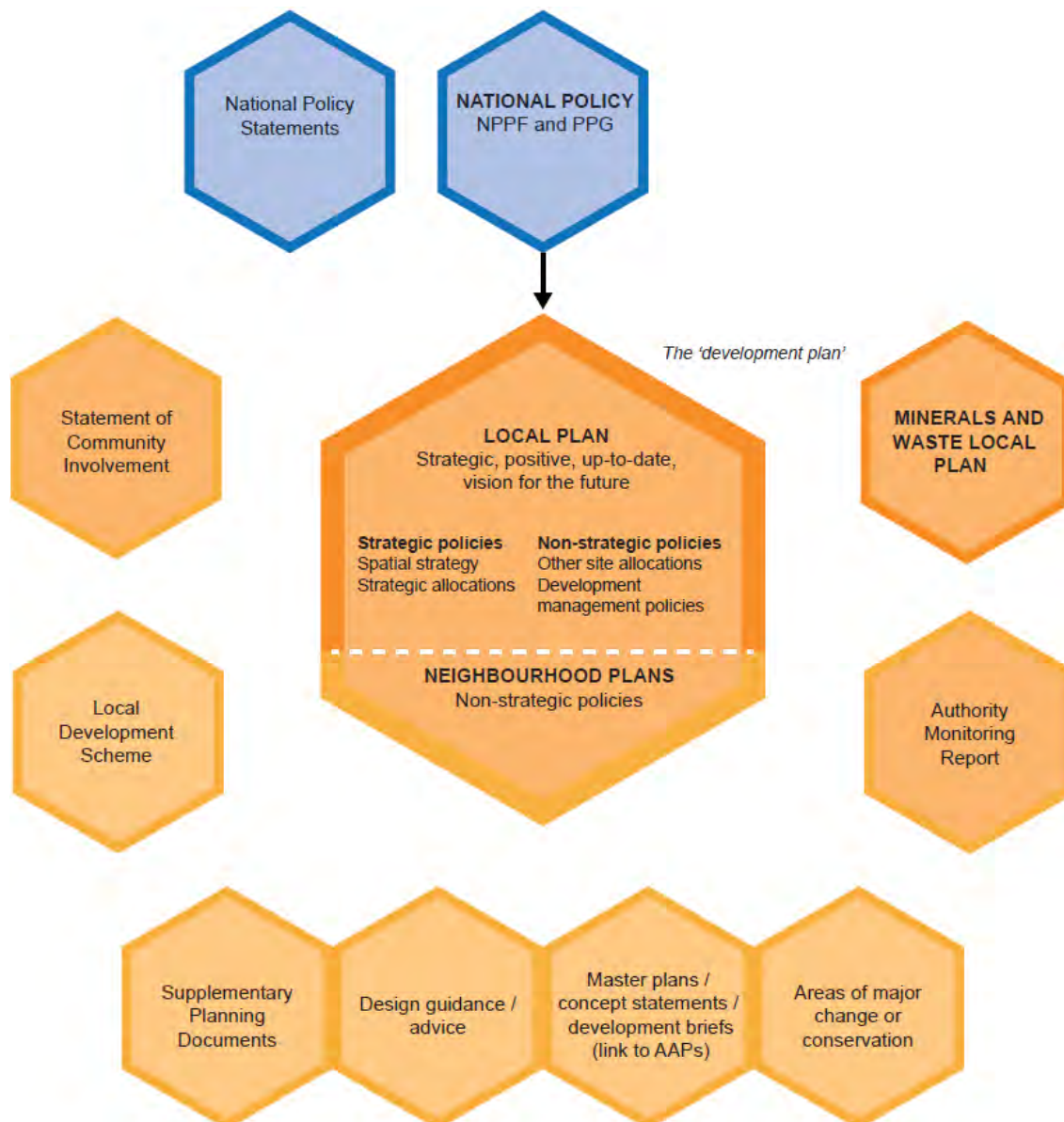
2.6 Relevant international plans and policies (including those at the EU level) are transposed into national plans, policies and legislation, and these have been considered in this chapter and in Appendix A.

Relationship with other relevant plans or programmes

2.7 The Tonbridge and Malling Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown in Figure 2.1 below. The new Local Plan will eventually replace the adopted Core Strategy (2007), Development Land Allocations DPD (2008), Tonbridge Central Area Action Plan (2008) and Managing Development and the Environment DPD (2010). The Local Plan also comprises any 'made' Neighbourhood Plans within the borough and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme,

Authority Monitoring Report and Supplementary Planning Documents, also shown in Figure 2.1.

Figure 2.1: Local Plan relationship with other relevant plans and programmes



International

2.8 At the international level, there is a wide range of plans and programmes which act to inform and shape national level legislation. Planning policy in England at a national and local level (i.e. the National Planning Policy Framework and Local Plan) should be aware of and in conformity with the relevant legislation. The main sustainability objectives of international plans and programmes which are of most relevance for the Local Plan and the SA are provided in Appendix A.

National

2.9 There is an extensive range of national policies, plans and programmes that are relevant to the Local Plan and the SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national policies, plans and programmes, focusing on those that are of most relevance. A summary of the main objectives of the National Planning Policy Framework and Planning Practice Guidance of relevance to the Local Plan and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the Local Plan and SA are provided in Appendix A.

The National Planning Policy Framework and Planning Practice Guidance

2.10 The National Planning Policy Framework (NPPF) [\[See reference 7\]](#) is the overarching planning framework which provides national planning policy and principles for the planning system in England. The NPPF was originally published in March 2012 and has since been updated and revised several times.

2.11 An updated version of the NPPF was published in December 2024. It includes a new standard method for assessing housing needs, which is much more ambitious than its predecessor. According to the new standard method, TMBC will need to deliver 1,096 dwellings per annum (it was previously 839 dwellings per annum).

2.12 The updated NPPF introduces a requirement for local planning authorities to review Green Belt under certain conditions. Specifically, if an authority cannot meet its identified needs for homes, commercial or other development through alternative means, it is mandated to review its Green Belt boundaries. The updated NPPF also includes a new designation for some sections of land currently designated as Green Belt, referred to as Grey Belt. Grey Belt is defined in the NPPF as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b) or (d) of the Green Belt, as specified in paragraph 143 of the NPPF. Therefore, Grey Belt does not always comprise previously developed land. Where it is necessary to release Green Belt land for development, plans should first give priority to previously developed land in the Green Belt, followed by land not previously developed in the Green Belt, and then other Green Belt locations. According to the NPPF, the need to promote sustainable patterns of development should determine whether a site's location within the Green Belt is appropriate or not.

2.13 The three overarching objectives of the planning system are set out in paragraph 8 of the NPPF, which should be pursued in mutually supportive ways so that net gains are achieved across each of the different objectives:

- “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.”

2.14 The New Local Plan must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

2.15 A local planning authority is also required to have regard to national policies and advice contained in guidance issued by the Secretary of State when preparing a Local Plan [\[See reference 8\]](#).

2.16 Paragraph 20 of the NPPF states the need for strategic policies in plan-making, which set out the overall strategy for the pattern, scale and design quality of places, making sufficient provision for:

“a) homes (including affordable housing), employment, retail, leisure and other commercial development;

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);

c) community facilities (such as health, education and cultural infrastructure); and

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.”

2.17 Planning Practice Guidance (PPG) [See reference 9] provides guidance for how the Government’s planning policies for England are expected to be applied. Sitting alongside the NPPF, it provides an online resource that is updated on a regular basis for the benefit of planning practitioners.

2.18 The overarching nature of the NPPF means that its implications for the SA relate to multiple topics which this report seeks to address. Considering the importance of the NPPF to the English planning system, the relevance of the framework and its implications for the plan-making process and the SA is provided in more detail below. Sustainability topics are separated into environmental, social and economic below, but consideration of issues often cuts across topics. The summary provided below is not absolutely comprehensive and the NPPF is intended to be read and applied as a whole during plan-making.

Environmental and social considerations

2.19 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to “support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable

and low carbon energy and associated infrastructure.” Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.

2.20 The SA can consider the contribution the alternatives make in terms of contribution to climate change mitigation as well as climate change adaptation.

2.21 In relation to health and well-being, healthy, inclusive and safe places which promote social interaction and integration, are safe and accessible, and enable and support healthy lifestyles are supported through the framework. The Building for a Healthy Life design toolkit [\[See reference 10\]](#) can be used by local authorities to assist in the creation of places that are better for people and nature.

2.22 One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”. It is identified in the document that “a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities”. Furthermore, the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship is supported. Importantly, Local Plans should also “contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible”. Additionally, larger scale developments such as new settlements or significant extensions to existing villages and towns are required by the NPPF to be guided by policies set within a vision that looks at least 30 years ahead [\[See reference 11\]](#). The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

2.23 The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The new Tonbridge and Malling Local Plan can have a significant influence on addressing inequalities,

including those relating to health, and will need to consider the appropriate siting of new development, particularly large development sites that are likely to include new service and facility provisions. The Local Plan can ensure that new development is located in areas which can improve accessibility for existing as well as new residents and ensure that future development does not exacerbate existing inequalities. The SA process can support the identification and refinement of options that can contribute to reducing inequalities and support the development of policy approaches that cumulatively improve the well-being of local communities.

2.24 The NPPF sets out the approach Local Plans should have in relation to biodiversity and states that Plans should “identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity. A strategic approach to maintaining and enhancing networks of habitats and green infrastructure is to be supported through planning policies. Currently, Tonbridge and Malling Borough Council is supporting Kent County Council in developing the Kent and Medway Local Nature Recovery Strategy, which sets out the county’s priorities for nature recovery and the recommended actions to deliver these.

2.25 The Tonbridge and Malling Local Plan should seek to maximise any opportunities arising for local economies, communities and health, as well as biodiversity. This should be inclusive of approaches which are supportive of enhancing the connectivity of green infrastructure and promoting the achievement of biodiversity net gain. The SA process should support the identification and maximisation of potential benefits through the consideration of alternatives and assessment of both negative and positive significant effects.

2.26 In relation to landscape, the NPPF sets the planning principles of recognising the intrinsic character and beauty of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards to this purpose at National Parks, The Broads and National Landscapes (formerly referred to as Areas of Outstanding Natural Beauty or AONBs). In December 2023, a new duty came into force via the Levelling-up and Regeneration Act that requires authorities to further the purposes of National Landscapes by conserving and enhancing their natural beauty.

2.27 The Local Plan should be supportive of an approach to development which would protect the landscape character of Tonbridge and Malling Borough and its surrounds. Where appropriate it should also seek to protect the identity of the built-up areas of Tonbridge and Malling. The SA should identify those alternatives which contribute positively to landscape and townscape character.

2.28 The NPPF states that in relation to the historic environment plans should “set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats”. Where appropriate, plans should seek to sustain and enhance the significance of heritage assets and local character and distinctiveness, while viable uses of assets should be considered. Plans should take into account the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring. They should also consider the contribution the historic environment can make to the character of a place.

2.29 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Revisions were made to the Building Regulations 2022 [See [reference 12](#)], setting minimum energy efficiency standards which are increasing the performance values of properties. From 15 June 2022, all new build homes are required to produce at least 31% less carbon emissions. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies

and targets. The UK Green Building Council has produced a resource pack which is designed to help local authorities improve the sustainability of new homes. The New Homes Policy Playbook [\[See reference 13\]](#) sets out minimum requirements for sustainability in new homes that local authorities should introduce, as well as proposed stretching requirements should local authorities wish to go further. For non-residential uses, BREEAM assessments can be used by local authorities to ensure buildings meet sustainability objectives.

2.30 The NPPF prevents new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Inappropriate development in areas at risk of flooding should be avoided. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account implications for water supply. Furthermore, strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision infrastructure for water supply and wastewater.

2.31 The new Tonbridge and Malling Local Plan presents an opportunity to consider incorporating targets for water efficiency and the level of water consumption and grey water recycling in any new development. The Local Plan also can ensure that development is sited away from areas of high flood probability and that appropriate water drainage is in place in line with flood risk strategies. The SA process should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.

2.32 The NPPF states that the planning system should protect and enhance soils in a manner commensurate with their statutory status or quality, while also encouraging the reuse of previously developed land.

2.33 The new Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this, the Local Plan should ensure that new development does not conflict with current minerals operations, as well as long-term mineral resource plans. The SA

process should inform the development of the new Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and most versatile agricultural land, as well as those which would promote the use of brownfield land.

2.34 The new Local Plan can offer enhanced protection for designated and non-designated heritage assets and their settings, including any potential archaeological finds in line with heritage protection and enhancement plans. The SA has a role to play by identifying which alternatives could offer opportunities to secure the protection and enhancement of assets as well as those which might have significant impacts in terms of their appropriate use and setting.

Economic considerations

2.35 The NPPF sets out that in terms of economic growth the role of the planning system is to contribute towards building a “strong, responsive and competitive economy” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure. Furthermore, planning policies should address the specific locational requirements of different sectors.

2.36 Local planning authorities should incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”. Local Plans are required to “set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration”.

2.37 The new Local Plan should seek to maximise the potential benefits of nearby strategic growth, while at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities within the

borough's district and neighbourhood centres are maintained and enhanced is also important and will also provide support for local communities. The SA process can support the development of the new Local Plan to ensure that its policies are considerate of impacts on the economy in Tonbridge and Malling Borough. The process can also be used to demonstrate that impacts on the viability of Tonbridge Town Centre and other local centres have been considered.

2.38 The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan-making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

2.39 Growth will inevitably increase traffic on the roads which also has implications for air quality, and the new Local Plan and SA process can seek to minimise effects of this nature through appropriately siting new development, identifying where mitigation may be needed and requiring the necessary transport provisions and contributions from new development. The Local Plan, as supported by the SA, should seek to identify opportunities to maximise the potential for alternative modes of transport to the car and reduce the need to travel, therefore reducing emissions, through the consideration of alternatives and assessment of significant effects. This includes potential opportunities that may arise as a result of the delivery of new infrastructure.

Other national policies, plans and programmes

2.40 Numerous other policies, plans and programmes at a national level are of relevance to the preparation of the Tonbridge and Malling Local Plan and the

SA. Unlike the NPPF, most of the documents are focussed on a specific topic area which the SA will consider. There will be some overlap between SA topics covered by these plans and programmes where those documents contain more overarching objectives. However, the plans and programmes considered of most relevance to the SA have been grouped by the topics they most directly seek to address, and the sections below each topic heading summarise the implications of the national policies, plans and programmes for the Local Plan and SA.

Climate change adaption and mitigation, energy efficiency and waste minimisation

2.41 The relevant national policies, plans and programmes under this topic are:

- State of the UK Climate (2024)
- Carbon Budget Delivery Plan (2023)
- Powering Up Britain (2023)
- The Net Zero Growth Plan (2023)
- The Environment Improvement Plan (2023)
- UK Climate Change Risk Assessment (2022)
- British Energy Security Strategy (2022)
- The Environment Act (2021)
- The Net Zero Strategy: Build Back Greener (2021)
- The Industrial Decarbonisation Strategy (2021)
- The Heat and Buildings Strategy (2021)
- The UK Hydrogen Strategy (2021)
- Energy Performance of Buildings Regulations (2021)
- The Waste Management Plan for England (2021)

- The Energy White Paper: Powering our Net Zero Future (2020)
- National Infrastructure Strategy: Fairer, Faster, Greener (2020)
- Decarbonising Transport: Setting the Challenge (2020)
- Sixth Carbon Budget (Climate Change Committee, 2020)
- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- The National Flood and Coastal Erosion Risk Management Strategy for England (2020)
- The Waste (Circular Economy) (Amendment) Regulations (2020)
- Net Zero – The UK’s Contribution to Stopping Global Warming (2019)
- The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019)
- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the Country Resilient to a Changing Climate (2018)
- Our Waste, Our Resources: A Strategy for England (2018)
- The Clean Growth Strategy (2017)
- National Planning Policy for Waste (NPPW) (2014)
- Waste Management Plan for England (2013)
- The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)
- The Promotion of the Use of Energy from Renewable Sources Regulations (2011)
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- The UK Renewable Energy Strategy (2009)

■ Planning and Energy Act (2008)

Implications for the Local Plan and SA

The Local Plan should consider setting out policies to achieve climate change mitigation and adaptation while also encouraging development which would help to minimise carbon emissions.

The Local Plan should help to ensure that new development is energy efficient and promotes the use of sustainable construction methods and materials, as well as reduce their carbon emissions. In addition, the Local Plan should seek to allocate development in areas where sustainable transport patterns can be best achieved and encourage development to make use of more sustainable sources of energy, potentially through the delivery of renewable energy development. The Local Plan should also ensure that risk from all sources of flooding as a result of climate change is managed effectively and should ensure that development is resilient to future flooding. This could include the Local Plan setting out approaches to encourage the appropriate use of SuDS to minimise flood risk. The Local Plan should also consider the handling of waste in line with the waste hierarchy.

The SA can test policy options in relation to the contributions they make towards these aims. It should also appraise the contribution individual sites can make to limiting carbon emissions (including through the uptake of more sustainable sources of energy). Sites should also be considered in terms of the impact they will have in terms of promoting climate change adaptation as well as reducing flood risk and the amount of waste that goes to landfill.

Health and well-being

2.42 The relevant national policies, plans and programmes under this topic are:

- Levelling Up and Regeneration Act (2023)
- Green Infrastructure Framework (2023)
- Anti-Social Behaviour Action Plan (2023)
- Homes England Strategic Plan 2023-2028 (2023)
- White Paper Levelling Up the United Kingdom (2022)
- A Fairer Private Rented Sector White Paper (2022)
- National Design Guide (2021)
- The State of the Environment: Health, People and the Environment (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Using the Planning System to Promote Healthy Weight Environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Public Health England, PHE Strategy 2020-2025 (2019)
- Homes England Strategic Plan 2018-2023 (2018)
- The Housing White Paper Fixing Our Broken Housing Market (2017)
- Planning Policy for Traveller Sites (2015)
- Technical Housing Standards – Nationally Described Space Standard (2015)
- Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013)
- Laying the Foundations: Housing Strategy for England (2011)

- Fair Society, Healthy Lives (2010)
- Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)
- Environmental Noise Regulations (2006)

Implications for the Local Plan and SA

The Local Plan needs to consider the need for infrastructure as this has a significant impact on the environment and it should be prepared to ensure that the population has access to sustainable low carbon infrastructure and services and facilities and that there is sufficient capacity within them to serve the increased population. This should include healthcare, education and open space. Development should be located in areas where facilities are most accessible, issues of overcapacity would be less likely to result, and active modes of travel might be promoted. Policies included in the Local Plan can also help to facilitate the supply of healthy local food, for example by allocating land for allotments. The provision of an appropriate level of housing over the plan period will help address issues of disparity in terms of access to decent housing in the plan area. The provision of new housing should be considerate of local needs with regards to housing size, tenure and type, including the needs of Gypsies, Travellers and Travelling Showpeople.

Policy options considered for the Local Plan can be tested through the SA in relation to the contributions they make towards these aims. The SA should also appraise the contribution the development strategy can make to health and wellbeing. This should be considered in relation to the ability to support the delivery of new infrastructure and facilities which might benefit public health, as well as accessibility to existing infrastructure and facilities of this nature. The capacity of existing facilities may also need to be

considered. Consideration should also be given to the Local Plan's ability to deliver the required number of new homes, including affordable homes.

Environment (biodiversity/geodiversity, landscape and soils)

2.43 The relevant national policies, plans and programmes under this topic are:

- The Environment Improvement Plan (2023)
- The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023)
- 25 Year Environment Plan: Progress Reports (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- The Environment Act (2021)
- 25 Year Environment Plan: Progress Reports (2020)
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019)
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- Environmental Damage (Prevention and Remediation) Regulations (2015)
- Biodiversity Offsetting in England Green Paper (2013)
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011)
- Defra Right of Way Circular (01/09) (2011)
- Countryside and Rights of Way Act (2010)
- Safeguarding Our Soils – A Strategy for England (2009)

- England Biodiversity Strategy Climate Change Adaptation Principles (2008)
- Natural Environment and Rural Communities Act (2006)
- Wildlife and Countryside Act (1981) (as amended)
- National Parks and Access to the Countryside Act (1949)

Implications for the Local Plan and SA

The Local Plan should be prepared to limit the potential for adverse impacts on biodiversity and geodiversity as well as important landscapes (including those that are designated) and higher value soils. The plan area contains a number of important biodiversity sites which will need to be protected through planning policy. The plan should also take into account non-designated landscapes identified to be particularly sensitive to development and non-designated habitats which form part of wider ecological networks. The plan also presents opportunities to promote the achievement of net gain in biodiversity. Measures may include the incorporation of new green-blue corridors, to support the passing of wildlife and water through new developments, and will also help to reduce higher rates of surface water runoff. These aims may be supported through the appropriate update of the spatial strategy. It can also be used to encourage the re-use of brownfield land and protect more valuable agricultural soils from development. Benefits may be achieved by directing development to less sensitive locations. Updated planning policy can also be used to achieve habitat connectivity through the provision of new green infrastructure.

It will be the role of the SA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural

soils should also be appraised. The findings of the Habitats Regulations Assessment should inform the appraisal of the options where appropriate.

Historic environment

2.44 The relevant national policies, plans and programmes under this topic are:

- Historic England Corporate Plan 2023-2026 (2023)
- Heritage Statement (2017)
- Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016)
- Government's Statement on the Historic Environment for England (2010)
- Planning (Listed Buildings and Conservation Areas) Act (1990)
- Ancient Monuments and Archaeological Areas Act (1979)
- Historic Buildings and Ancient Monuments Act (1953)

Implications for the Local Plan and SA

The potential impact of new development on the historic environment, including local character as well as designated and non-designated heritage assets and their respective settings should also inform the preparation of the Local Plan. Particular regard may be given to protecting heritage assets which have been identified as being 'at risk' (both at the national and local level). The update of the spatial strategy should be considered in relation to its potential impacts in relation to these issues.

The SA should appraise options for the Local Plan in terms of the potential for effects on the historic environment. The SA will help identify which sites

are more likely to have adverse effects on the historic environment, helping inform the selection of preferred sites. The Local Plan should seek to protect and enhance the historic environment.

Water and air

2.45 The relevant national policies, plans and programmes under this topic are:

- Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023)
- Air quality strategy for England (2023)
- Managing Water Abstraction (2021)
- Environment Act (2021)
- National Chalk Streams Strategy Chalk Stream Strategy (2021)
- Meeting Our Future Water Needs: A National Framework for Water Resources (2020)
- Clean Air Strategy (2019)
- The Road to Zero (2018)
- Our Waste, Our Resources: A Strategy for England (2018)
- Environmental Noise Regulations (2018)
- Water Supply (Water Quality) Regulations 2018
- Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Drought Response: Our Framework for England (2017)
- Managing Water Abstraction (2016)
- Environmental Permitting Regulations (2016)

- Nitrate Pollution Prevention Regulations (2015)
- Water White Paper (2012)
- National Policy Statement for Waste Water (2012)
- Air Quality Standards Regulations (2010)
- Flood and Water Management Act (2010)
- Groundwater (England and Wales) Regulations (2009)
- Flood Risk Regulations (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Urban Waste Water Treatment Regulations (2003)
- Environmental Protection Act (1990)

Implications for the Local Plan and SA

Local planning authorities should consider setting out approaches in their Local Plans to promote the efficient use of water and limit all types of pollution including water and air pollution. They should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. The allocation of sites for development should take account of areas which are of highest sensitivity in relation to these issues, including Source Protection Zones (SPZs) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the plan period, local planning authorities should consider setting out approaches in their Local Plan to factor in the contribution that specific site options can make to achieving modal shift and limiting the need for residents to travel.

The contribution policy options can make to achieving these aims can be tested through the SA. Options can be considered in relation to particular sensitivities of the WwT infrastructure and other identified areas (such as SPZs and AQMAs).

Economic growth

2.46 The relevant national policies, plans and programmes under this topic are:

- The Levelling Up and Regeneration Act (2023)
- The White Paper Levelling Up the United Kingdom (2022)
- The Growth Plan (2022)
- Build Back Better: Our Plan for Growth (2021)
- Agricultural Transition Plan 2021-2024 (2020)
- Agriculture Act (2020)
- UK Industrial Strategy: Building a Britain Fit for the Future (2018)
- LEP Network response to the Industrial Strategy Green Paper Consultation (2017)
- National Infrastructure Delivery Plan 2016-2021 (2016)

Implications for the Local Plan and SA

The Local Plan should allocate land to support the projected level of economic growth required over the plan period. Local planning authorities should consider setting out approaches in Local Plan policies to promote sustainable economic and employment growth to benefit all members of the community and to reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function

successfully. Employment sites should be located to enable local people to be able to access the new employment opportunities. Local Plan policies may also seek to promote the viability of town and village centres.

The SA can test options in relation to the contribution they can make to achieving these aims. Options should be appraised in terms of the contribution they can make to meeting the employment land requirements of the borough as well as the access residents would have to the employment opportunities delivered.

Transport

2.47 The relevant national policies, plans and programmes under this topic are:

- Future of Transport: Supporting Rural Transport Innovation (2023)
- Levelling Up the United Kingdom White Paper (2022)
- Cycling and Walking Investment Strategy Report to Parliament (2022)
- Future of Freight Plan (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Environment Act (2021)
- Decarbonising Transport: Setting the Challenge (2020)
- Jet Zero Strategy Delivering Net Zero Aviation by 2050 (2020)
- The Road to Zero (2018)
- Transport Investment Strategy (2017)
- Highways England Sustainable Development Strategy and Action Plan (2017)
- Airports: The Government's View Summary Document – Moving Britain Ahead (2016)

- Door to Door: A Strategy for Improving Sustainable Transport Integration (2013)

Implications for the Local Plan and SA

The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Local Plan and its site allocations. The Local Plan should also encourage walking and cycling as alternative modes of transport by providing safe and attractive walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

The SA should be used to test options in terms of the contribution they can make to making transport choices more sustainable in the borough. This includes the contribution they make to the uptake of more sustainable transport options, such as walking and cycling and public transport.

Sub-national

2.48 Below the national level there are further plans and programmes which are relevance to the Local Plan and SA process. These plans and programmes sit

mostly at the county and borough level, and further details are provided in Appendix A.

County

- Commissioning Plan for Education Provision in Kent 2025-2029 (2025)
- Kent County Council Local Transport Plan 5: Striking the Balance 2024-2037 (2024)
- Kent Local Flood Risk Management Strategy 2024-2034 (2024)
- Kent Drug and Alcohol Strategy 2023-2028 (2022)
- Framing Kent's Future 2022-2026 (2022)
- Kent Adult Social Care Strategy 2022-2027 (2022)
- Kent Nature Partnership Biodiversity Strategy 2020-2045 (2020)
- Kent County Council Minerals and Waste Local Plan 2013-2030 (2020)
- Kent and Medway Energy and Low Emissions Strategy Implementation Plan 2020-2023 (2020)
- Kent County Council Active Travel Strategy 2018/19 (2018)
- Kent County Council Growth and Infrastructure Framework (2018)
- Kent Environment Strategy (2016)
- Kent Joint Health and Wellbeing Strategy 2014-2021 (2014)

Borough

- Annual Service Delivery Plan 2025/26 (2025)
- Tonbridge and Malling Community Safety Partnership Plan 2024-2025 (2024)
- Tonbridge and Malling Borough Council Corporate Strategy 2023-2027 (2023)

Chapter 2 Relevant plans and programmes

- Tonbridge and Malling Borough Council Economic Development Strategy 2023-2027 (2023)
- Tonbridge and Malling Borough Council Air Quality Action Plan (2022)
- Tonbridge and Malling Borough Council: Borough Economic Recovery Strategy 2021-2023 (2021)
- Tonbridge & Malling Borough Council Housing Delivery Test Action Plan (2021)
- Tonbridge and Malling Borough Council, Climate Change Strategy 2020-2030 (2020)
- Tonbridge and Malling Borough Council Contaminated Land Inspection Strategy (2016)
- Tonbridge and Malling Cycling Strategy 2014-2019 (2014)
- Tonbridge and Malling Borough Council, Managing Development and the Environment (2010)
- Tonbridge and Malling Borough Council, Local Development Framework – Tonbridge Central Area Action Plan (2008)
- Tonbridge and Malling Borough Council, Local Development Framework – Development Land Allocations (2008)
- Tonbridge and Malling Borough Council Affordable Housing Supplementary Planning Document (2008)
- Tonbridge and Malling Borough Council, Local Development Framework – Core Strategy (Adopted 2007)

Other

- Medway Joint Local Health and Wellbeing Strategy 2024-2028 (2024)
- High Weald National Landscape AONB Management Plan 2024-2029 (2024)

- Medway River Basin Catchment Drainage and Wastewater Management Plan (2022)
- The Kent Downs National Landscape Management Plan 2021-2026 (2021)
- Tonbridge and Tunbridge Wells – Tonbridge Urban Transport Delivery Strategy (2007)

Implications for the Local Plan

The new Local Plan needs to consider the above sub-national plans for Kent and Tonbridge and Malling.

The Local Plan should support the aim to transition towards net zero and support adaptation to climate change. The Local Plan should meet the commitments that Tonbridge and Malling Borough Council made to reduce its own emissions following the declaration of a climate emergency in 2019.

The Local Plan offers the opportunity to maximise the well-being benefits of well-designed open spaces and areas for recreation. The Local Plan should help to ensure that the provision of open space and areas of recreation are of sufficient quantity and quality to meet the needs of the plan area, encouraging healthy and active lifestyles. The Local Plan should also consider opportunities for biodiversity enhancement within open spaces and across Tonbridge and Malling Borough.

The provision of an appropriate level of housing will help address issues of inequality in relation to housing in the plan area and support economic growth. The provision of new housing should be considerate of local needs, including the needs of Gypsies, Travellers and Travelling Showpeople. The new Local Plan should support economic growth within Tonbridge and

Malling Borough, including supporting the rural economy and infrastructure requirements. This economic growth should align with the aims in Kent.

The Local Plan should encourage the use sustainable forms of transport such as walking and cycling and public transport. The Local Plan should also support the infrastructure requirements to enhance and decarbonise transport within Tonbridge and Malling Borough. Transport plans for Kent have been produced and should be taken into consideration.

Surrounding development plans

2.49 Development in Tonbridge and Malling Borough will not be delivered in isolation from those areas around it. Given the interconnection between Tonbridge and Malling Borough and surrounding areas, there is potential for cross-boundary and in-combination effects through development plans in neighbouring authorities. This is of particular importance with Tonbridge and Malling being influenced by two primary Housing Market Areas (HMAs): the Sevenoaks/Tonbridge/Tunbridge Wells HMA and the Maidstone HMA. Additionally, the borough's inclusion in the West Kent Functional Economic Market Area (FEMA), alongside Sevenoaks and Tunbridge Wells, reflects the shared economic activities, commuting patterns, and interdependencies across these areas. As such, a summary of the plans for the following local authority areas which surround Tonbridge and Malling Borough is provided in Appendix A:

- Maidstone
- Tunbridge Wells
- Sevenoaks
- Gravesham
- Medway

2.50 Appendix A also includes a summary of the transport and minerals and waste plans which, together with the relevant Local Plan documents, comprise the development plans for these authorities.

2.51 As the SA progresses, consideration will be given to the extent to which the content of these other plans could lead to in-combination effects with the Tonbridge and Malling Local Plan, for example as a result of any large-scale new development being proposed in close proximity to the borough that could result in effects across borough/district boundaries.

Chapter 3

Baseline information

3.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

3.2 Schedule 2 of the SEA Regulations requires information to be provided on:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.
- Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as a European site (within the meaning of regulation 8 of the Conservation of Habitats and Species Regulations 2017).

3.3 This section presents the relevant baseline information for Tonbridge and Malling Borough. Data referred to have been chosen primarily for regularity and consistency of collection, to enable trends in the baseline situation to be established, and also to enable subsequent monitoring of potential sustainability effects.

Climate change adaptation and mitigation

Climate change

3.4 Climate change presents a global risk, with a range of different environmental, social and economic impacts that are likely to be felt within Tonbridge and Malling Borough across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year, as well as higher sea levels and increased river flooding. A strong reaction is required from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

3.5 There has been a general trend towards warmer average temperatures in recent years. 2024 was provisionally the fourth warmest year on record for the UK, with a mean temperature of 9.78°C, which is 0.64°C above the 1991-2020 average. Only 2022, 2023 and 2014 recorded higher average temperatures. All the top ten warmest years for the UK in the series from 1884 have occurred since 2000, with five of them in the most recent decade [\[See reference 14\]](#).

3.6 Tonbridge and Malling Borough Council's Climate Change Strategy 2020-2030 states that, based on the Paris Agreement's commitment for staying "well below 2°C and pursuing 1.5°C global temperature rise", the Tyndall Centre for Climate Research recommends that Tonbridge and Malling Borough stays within a maximum cumulative CO₂ emissions budget of 6.4 million tonnes (MtCO₂) between 2020 and 2100 [\[See reference 15\]](#). According to 2017 CO₂ emissions, Tonbridge and Malling Borough Council will use the entire budget by 2027. To remain within the recommended budget, the borough needs to transition from fossil fuels. Therefore, the overarching commitment of the Council is to be carbon neutral by 2030.

3.7 The Tonbridge and Malling Borough Climate Change Strategy 2020-2030 states that the borough currently experiences hotter, drier summers and warmer, wetter winters. This has resulted in increased severe weather incidents such as storms and flooding. The Council has recently worked with Kent County Council to produce the Kent County Council Climate Change Adaptation Plan 2025-2028, which was recommended for adoption in December 2024 [\[See reference 16\]](#).

3.8 A summary of UK Climate Projections 2018 (UKCP2018) for Kent County identified the following climate changes:

- Increased average summer temperature of 2-3°C by 2040.
- Increased average winter temperature of 1-2°C by 2040.
- Decreased average summer precipitation of 20-30% by 2040.
- Increased average winter precipitation of 10-20% by 2040.

3.9 The Intergovernmental Panel on Climate Change AR6 Synthesis Report (2023) highlights that an increase in greenhouse gas emissions is predicted to continue into 2030 making it likely that global warming will exceed 1.5°C, which in turn means that it will become harder to maintain global temperatures below 2°C. This will elicit climate hazards such as increased incidences of heatwaves, droughts, increased global monsoon precipitation, tropical storms, very wet and very dry weather. Natural land and ocean carbon sinks will become less effective, sea levels will rise, become more acidic and experience deoxygenation amongst other climate events [\[See reference 17\]](#). The Paris Agreement is a legally binding international treaty involving 196 parties. The overarching goal of this agreement is to limit global warming increasing to 1.5°C by the end of the century. Achieving this goal still requires a lot of action but since 2016 when the agreement was established, low carbon solutions and new markets for climate resilience have emerged.

3.10 The climate emergency declaration and aim for carbon neutrality increase the urgency and need for new development to be net zero carbon. The Tyndall Centre has identified a carbon budget for local authorities in England. For Tonbridge and Malling, it is recommended that the borough should:

- Stay within a maximum cumulative carbon dioxide emissions budget of 6.4 million tonnes (MtCO₂) for the period of 2020 to 2100.
- Deliver cuts in emissions averaging a minimum of 12.9% per year to ensure a Paris Agreement aligned carbon budget.
- Reach zero or near zero carbon no later than 2042 [\[See reference 18\]](#).

3.11 Carbon dioxide is the principal greenhouse gas. Tonbridge and Malling Borough Council's Climate Change Strategy 2020 to 2030 outlines how the Council will address the causes and consequences of climate change and includes an aim for Tonbridge and Malling Borough to become a carbon neutral Council and a carbon neutral area by 2030 [\[See reference 19\]](#).

Carbon dioxide emissions

3.12 The Government regularly publishes local and regional carbon dioxide emissions national statistics. Territorial carbon dioxide emissions within the scope of influence of Tonbridge and Malling Borough have fallen from 6.9 per capita emissions (tCO_{2e}) to 3.6 per capita emissions/tCO_{2e} between 2005 and 2022 [\[See reference 20\]](#) (Table 3.1: Territorial carbon dioxide emissions estimates within the scope of influence of Tonbridge and Malling Borough 2005-2022). It is worth noting that of Tonbridge and Malling's neighbouring local authority areas, Maidstone (3.5tCO_{2e}), Sevenoaks (3.4tCO_{2e}), Gravesham (3.3tCO_{2e}) and Medway (2.7tCO_{2e}) perform more favourably in terms of emissions per capita. Tonbridge and Malling performs more favourably than Tunbridge Wells (3.7tCO_{2e}) in this regard.

3.13 It should be noted the figures in **Error! Reference source not found.** do not account for large industrial sites, railways, motorways, land-use, livestock and soils.

Table 3.1: Territorial carbon dioxide emissions estimates within the scope of influence of Tonbridge and Malling Borough 2005-2022

Year	Total emissions (kt)	Per capita emissions (tCO ₂ e)
2005	775.1	6.9
2006	782.0	6.9
2007	769.1	6.7
2008	770.2	6.6
2009	711.9	6.0
2010	762.3	6.3
2011	702.2	5.8
2012	726.5	6.0
2013	704.2	5.8
2014	727.5	5.9
2015	622.5	5.0
2016	584.7	4.6
2017	562.9	4.4
2018	563.6	4.3
2019	542.9	4.1
2020	486.6	3.7
2021	510.9	3.9
2022	476.3	3.6

3.14 In Tonbridge and Malling Borough, the domestic and transport sectors have been the main contributors to carbon dioxide emissions. However, between 2005 and 2022, domestic sector emissions fell from 282.5kt to 161.6kt,

a reduction of 120.9kt or 42.8%. Meanwhile, transport sector emissions decreased from 224.2kt to 173.6kt, a 50.6kt reduction, reflecting a 22.6% decrease. This is shown in Table 3.2 The table also shows that emissions have decreased across almost all sectors in Tonbridge and Malling, with the exception of agriculture, which recorded a 20.2% increase, and waste, where emissions remained unchanged.

Table 3.2: Changes in carbon dioxide emissions by sector for Tonbridge and Malling Borough between 2005 and 2022

Source of emissions	2005	2022
Industry	71.4	49.0
Commercial	144.6	56.8
Public Sector	35.2	14.3
Domestic	282.5	161.6
Transport	224.2	173.6
Agriculture	17.1	20.9
Waste	0.2	0.2
Grand Total	775.1	476.3

Overall energy consumption

3.15 The Department for Energy Security and Net Zero produced the following consumption figures for Tonbridge and Malling Borough in 2022. These figures are presented as ktoe (kilotonnes of oil equivalent):

- All fuels – a total of 261.6ktoe across domestic, transport and industrial, commercial and other use.
- Coal – a total of 1.3ktoe predominantly through domestic and industrial use.

- Manufactured fuels – a total of 0.7ktoe across domestic and industrial use.
- Petroleum – a total of 134.5ktoe predominantly from road transport.
- Gas – a total of 69.2ktoe predominantly through domestic use.
- Electricity – a total of 38.7ktoe through domestic, industrial, commercial and other use.
- Bioenergy and wastes – a total of 17.2ktoe predominantly through road transport and industrial and commercial use.

3.16 Table 3.3 below highlights the energy consumption for Tonbridge and Malling between 2005 to 2022 by type. During this period, the consumption of coal, manufactured fuels, petroleum, gas and electricity decreased, while energy from bioenergy and wastes was the only category that increased [\[See reference 21\]](#).

Table 3.3: Energy consumption in Tonbridge and Malling Borough by type

Energy Type	Energy consumption in ktoe (2005)	Energy consumption in ktoe (2022)
Coal	2.1	1.3
Manufactured Fuels	1.0	0.7
Petroleum	152.7	134.5
Gas	393.4	69.2
Electricity	45.5	38.7
Bioenergy and Wastes	14.9	17.2
Total	609.6	261.6

Renewable energy

3.17 Renewable energy is recognised as an important contributor to reducing reliance on fossil fuels and adapting to climate change. Within the South East of England, there was a total of 219,287 sites that were capable of generating renewable energy across wind, solar, wave, hydro and biomass renewable sources in 2023. This represents 14.6% of all the sites within the UK that generate renewable energy. In 2023, the South East of England generated a total of 10,416.4GWh of renewable energy. This is a 92.7% increase in renewable energy generation since 2013.

3.18 In 2022, a total of 2,682 photovoltaic panels and two onshore wind turbines were installed in Tonbridge and Malling. This is an increase on 2014 when 931 photovoltaic panels and one onshore wind turbines were installed [\[See reference 22\]](#). Renewable electricity produced in Tonbridge and Malling, as at the end of 2023, is detailed in Table 3.4 below.

Table 3.4: Renewable electricity generation in Tonbridge and Malling in 2023

Type	Number of Sites	Capacity (MW)	Generation (MW)
Photovoltaic	2,682	22.2	19,722
Onshore Wind	2	0	[X] [See reference 23]
Anaerobic Digestion	1	1.3	[X]
Sewage Gas	2	0.7	[X]
Landfill Gas	4	6.2	14,331
Plant Biomass	2	0.2	[X]
Total	2,693	30.6	34,053

3.19 Tonbridge and Malling's Borough Council's Climate Change Strategy commits the borough to becoming carbon neutral by 2030 [\[See reference 24\]](#). The strategy outlines a commitment to reducing CO₂ emissions across all sectors. The Council seek to reduce emissions from energy consumption in all Council buildings, in-house fleet transport and staff travel. The Carbon Audit produced by Tonbridge and Malling Borough Council reported total gross carbon dioxide equivalent emissions of 3,327.2tCO₂e for the 2023/24 period [\[See reference 25\]](#). This represents a slight decrease of approximately 2.09% from the 3,398.3tCO₂e recorded in 2022/23 [\[See reference 26\]](#). The reflects Council attempts to fully embed carbon management within all Council policies and procedures.

3.20 The transport sector contributes significantly to CO₂ levels. Between 2020 and 2021, there was rise in transport greenhouse gas emissions (ktCO₂e) of 6.4%, from 337.3ktCO₂e to 359.0ktCO₂e [\[See reference 27\]](#). Collaborating with Kent County Council, Tonbridge and Malling Borough Council aims to tackle this issue by promoting lower carbon and healthy transport choices. The borough is further looking to work towards all taxis becoming Ultra Low Emission Vehicles [\[See reference 28\]](#).

3.21 The Renewable Heat Incentive accreditation is a Government scheme that aims to encourage the uptake of renewable heat technologies amongst householders, communities and businesses through financial incentives. Between April 2014 and October 2019, 100 domestic installations have been accredited in Tonbridge and Malling, which is 8% of Kent and Medway's total. However, the Climate Change Strategy 2020 to 2030 notes that further work is required to accelerate the take up of low emission heating systems [\[See reference 29\]](#).

3.22 Further to this, Tonbridge and Malling are stakeholders in the Kent and Medway Energy and Low Emissions Strategy, and the Council works with Kent County Council to help meet targets outlined in the strategy.

3.23 Tonbridge and Malling Borough Council has outlined the steps it will take to achieve the goals set out in its Climate Change Strategy 2020 to 2030.

Progress on the Action Plan for the 2024/2025 period includes [\[See reference 30\]](#):

- Carbon literacy training course delivered to staff and Council members three times per year.
- Additional funds secured for vehicle replacement schedule (transitioning to ULEV) for all parking vehicles. Two vehicles proposed for replacement under the capital renewals programme in 2024/25.
- Phase 2 of the electric vehicle charging points project, which began in summer 2024, will deliver an additional 60 chargers in the Council's car parks over the two-year contract period.
- The Council is working with housing association partners, including Clarion Housing Group and Golding Homes, to improve the energy efficiency of social housing through whole-house retrofit measures. Under the Social Housing Decarbonisation Fund (SHDF) Wave 1.2 scheme, which ends in March 2026, approximately 250 Clarion homes in the Tonbridge and Malling area and around 77 Golding Homes properties in Aylesford will benefit from these energy efficiency upgrades, helping to reduce carbon emissions.

3.24 With regard to solar energy, Tonbridge and Malling Borough Council, in partnership with the 11 other district councils in Kent and Medway Council, is part of the Solar Together Kent scheme. This group-purchase initiative helps householders and small businesses install solar panels and battery storage at competitive prices. Not only can the scheme enable residents to obtain solar panels and battery storage at a lower price, but can help lower energy bills and support the borough's ambition to become net zero by 2030 [\[See reference 31\]](#).

3.25 Additionally, in 2023, Tonbridge and Malling Borough Council fitted 190 solar panels at the Larkfield Leisure Centre. Grants totalling more than £1.5 million, including a grant of £1,164,760 awarded by the Public Sector Decarbonising Schemes, and £405,000 by Sport England, will be used to fund energy saving measures at the Larkfield Leisure Centre. This includes through the addition of new solar panels and LED lighting, as well as the installation of

air source heat pumps, which will allow for the removal of the current gas fired boilers serving the pool [\[See reference 32\]](#).

Population, health and well-being

Population

3.26 Tonbridge and Malling's population in 2021 was 132,200, which is an 9.4% increase since 2011. This is above the national average of 6% over the same time period [\[See reference 33\]](#). By 2023, the population had increased further to 135,200 (48.5% male and 51.5% female) [\[See reference 34\]](#). Tonbridge and Malling's population increase is higher than the increase for the South East of England (7.7%). In Kent, the largest population increase was in Dartford (19.9%), while the lowest was in Tunbridge Wells (0.3%) [\[See reference 35\]](#).

3.27 Tonbridge and Malling has a population density of 5.6 people per hectare [\[See reference 36\]](#). According to the 2022 mid-year population estimates at ward level, approximately 70% of the total population in Tonbridge and Malling Borough is concentrated in urban areas, while the remaining 30% is distributed across the rural areas. This figure reflects the same spatial distribution across Kent where 73% of people live in urban areas and 27% live in rural areas. This spatial distribution across the borough has remained stable across the 2022 and 2021 mid-year population estimates [\[See reference 37\]](#).

3.28 Over the period 2024 to 2042, the population is projected to increase by 14.4% to 152,859. This value is greater than the wider county-level projection of 13.9% [\[See reference 38\]](#).

3.29 The population of Tonbridge and Malling comprises approximately 65,600 men and 69,600 women. The age distribution of the population in Tonbridge and Malling is similar to the national picture, with the under 15 age group accounting for 18.7% of Tonbridge and Malling's population, compared with 17.2% nationally. The 15 to 64 group accounts for 62% of Tonbridge and

Malling’s population, which is a similar proportion to the national figure (64.1%). The majority of this percentage is made up of people aged 50-59. The 65 and over age group represents 19.3% of the population of Tonbridge and Malling, compared with 18.7% nationally [\[See reference 39\]](#).

3.30 The old age dependency ratio, defined as the number of people of state pension age per 1,000 people of working age (from 16 years up to state pension age) is also expected to increase within Tonbridge and Malling Borough between 2024 and 2042. In 2021, there were 294.2 people of state pension age per 1,000 people of working age. In 2042, it is predicted that this number will increase by 25.8% to 370.0 people of state pension age per 1,000 people of working age [\[See reference 40\]](#).

3.31 As outlined by the above statistics, there will be a significant increase in the ageing population within Tonbridge and Malling Borough between 2024 and 2042.

3.32 Table 3.5 below shows the breakdown of Tonbridge and Malling’s population by ethnic group [\[See reference 41\]](#).

Table 3.5: Tonbridge and Malling Population by ethnic group (2021)

Ethnic group	% of population
Asian, Asian British or Asian Welsh	2.9
Black, Black British, Black Welsh, Caribbean or African	1.0
Mixed or Multiple ethnic groups	2.2
White	93.3
Other ethnic groups	0.6

3.33 According to the 2021 Census, there were 55,859 occupied households in Tonbridge and Malling. This means that on average there were 2.5 people living in each household. The distribution of residency and ownership status of homes in Tonbridge and Malling compared to nationally is summarised below:

- 25.6% of households are single-person households compared to a national figure of 30.1%.
- 10.2% of households are lone-parent households; nationally the figure is 11.1%.
- 51.1% of households are comprised of couples; nationally the figure is 45.3%.
- 70% of the population of Tonbridge and Malling own their property outright or with a mortgage or a loan. This means that 70% of Tonbridge and Malling residents are owner-occupiers compared to a figure of 61.3% nationally.
- 12.5% of the Tonbridge and Malling population rent their properties; nationally the figure is 20.5% [\[See reference 42\]](#).

3.34 The population of Tonbridge and Malling is spread across 19 wards. Table 3.6 below presents the breakdown of the population distribution in 2022 [\[See reference 43\]](#).

Table 3.6: Estimated populations by ward in Tonbridge and Malling Borough in 2022

Ward	Population in 2022
Aylesford North & North Downs	8,680
Aylesford South & Ditton	9,460
Birling, Leybourne & Ryarsh	6,280
Borough Green & Platt	6,090
Bourne	5,510

Ward	Population in 2022
Cage Green & Angel	9,080
East and West Peckham, Mereworth & Watlingbury	6,400
East Malling, West Malling & Offham	8,930
Higham	6,020
Hildenborough	5,680
Judd	7,010
Kings Hill	9,810
Larkfield	9,250
Pilgrims with Ightham	5,920
Snodland East & Ham Hill	6,030
Snodland West & Holborough Lakes	5,900
Trench	8,750
Vauxhall	8,750
Walderslade	3,020

Housing

3.35 In 2023, it was estimated by the Office for National Statistics that full-time employees could typically expect to spend around 8.3 times their workplace-based annual earnings on purchasing a home in England. This figure remained unchanged from 2022, but reflects a decrease compared with 2021, when it was 9.1 times their workplace-based annual earnings. Average house prices increased in 69% of areas compared with 2022, while average earnings increased in 88% of areas [\[See reference 44\]](#). Average house prices nationally increased by 14% in 2021, while average earnings fell by nearly 1%. This led to housing becoming less affordable [\[See reference 45\]](#).

3.36 The 2023 housing affordability ratio [\[See reference 46\]](#) is calculated by dividing house prices by gross annual workplace-based earnings (based on the median and lower quartiles of both house prices and earnings) to give a ratio which serves as an indicator of relative affordability. A higher ratio indicates that on average, it is less affordable for a resident to purchase a house in their local authority district. In the 318 local authorities in England and Wales, housing affordability improved in 237 (75%) local authorities since 2022. Average house prices increased in 69% of local authority districts in England and Wales, while average earnings increased in 88% of local authorities in 2023.

3.37 The 2023 housing affordability ratio indicates that Tonbridge and Malling Borough (12.3) is less affordable than surrounding areas of Medway (8.6), Gravesham (9.1), and Maidstone (11.7). However, the borough is more affordable than neighbouring areas of Sevenoaks (14.6) and Tunbridge Wells (12.6). This figure has steadily increased in recent years, rising by 32.3% since 2011 [\[See reference 47\]](#).

3.38 Average house prices across Tonbridge and Malling Borough increased by 23.6% between 2018 and 2024 [\[See reference 48\]](#). According to ONS median residential property prices for administrative geographies data, the median house price (2024) in the borough was £420,000, which is much higher than the English median residential property price of £290,000 [\[See reference 49\]](#).

3.39 The percentage of households in the social rented sector decreased in Tonbridge and Malling, as well as across England. In Tonbridge and Malling, the percentage of households in the social rented sector fell from 16.1% in 2011 to 15.4% in 2021, while across England it fell from 17.7% to 17.1%. During the same period, the regional percentage fell from 13.7% to 13.6%. Private renting in Tonbridge and Malling increased from 10.1% to 12.5%, while the rate of home ownership decreased from 71.1% to 70.0% [\[See reference 50\]](#).

3.40 The updated Housing Land Supply Position for Tonbridge and Malling provides evidence on the potential housing supply across the borough [\[See reference 51\]](#). It identifies an established housing need of 1,096 dwellings per annum. Over the period 2024-2042, this would result in a total housing target of

23,673 dwellings taking into account a 20% buffer. According to the update, Tonbridge and Malling Borough Council has a housing land supply of 2.89 years.

3.41 During the period 2023/24, 458 dwellings (net) were delivered against a cumulative annual target of 839. This represents an under-delivery of 381 homes [\[See reference 52\]](#). In the period between 1 April 2023 and 31 March 2024, 2,214 units were permitted. Of these, 14 were completed, totalling 2,200 units outstanding and 17 demolitions, of which three were completed, resulting in 2,186 net units extant [\[See reference 53\]](#). Housing completions compared with the Tonbridge and Malling Local Plan housing requirement is shown in Table 3.7 below [\[See reference 54\]](#).

Table 3.7: Housing completions compared with the Tonbridge and Malling Local Plan housing requirement

Year	Cumulative annualised plan target	Net gain in homes
2013-14	465	608
2014-15	665	487
2015-16	673	912
2016-17	696	830
2017-18	696	1,033
2018-19	839	455
2019-20	839	447
2020-21	839	447
2021-22	839	467
2022-23	839	524
2023-24	839	458

3.42 With regards to affordable housing, Tonbridge and Malling delivered the highest proportion of affordable dwellings in Kent with 41.4% or 156 out of a total of 377 dwellings during 2023/24 [\[See reference 55\]](#).

3.43 As of 2023, the dwelling stock in Tonbridge and Malling stands at 56,446 [\[See reference 56\]](#). This comprises:

- 10 local authority owned (0.02%);
- 8,603 private registered provider (15.24%);
- 6 other public sector (0.01%);
- 47,827 private sector (84.73%); and
- 8,613 total social (local authority + private registered provider) (15.26%).

3.44 The rate of homelessness on Tonbridge and Malling Borough is 8.9 per 1,000 people, which is lower than in England (13.4) and the South East (11.3).

Gypsies, Travellers and Travelling Showpeople

3.45 During the 2021 Census, 0.3% of the people of Tonbridge and Malling Borough described themselves as White: Gypsy or Irish Traveller, while 0.1% of people described themselves as White: Roma [\[See reference 57\]](#).

3.46 A Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) was completed in 2022 to establish the need for Gypsies and Travellers and Travelling Showpeople accommodation in the borough [\[See reference 58\]](#). The assessment identified an overall cultural need for 41 Gypsy and Traveller pitches across the borough over the period 2021/22 to 2039/40. Of this need, 25 pitches arise from households who meet the Planning Policy for Traveller Sites (PPTS) nomadic habit of life definition and 16 are from households who do not meet the PPTS definition as they no longer lead a nomadic habit of life [\[See reference 59\]](#). The pitch shortfall over the period up to 2039-40 is an annualised cultural need of 2.1 pitches, of which 1.3 pitches are attributed to the PPTS requirement.

3.47 The GTAA notes that the need for pitches has the potential to be met through the regularisation of existing temporary authorised and unauthorised sites and the expansion/intensification of existing sites. There are currently 19 unauthorised pitches and two private temporary authorised pitches. There is also potential for additional pitches on existing sites. There are currently two Travelling Showperson's yards in Tonbridge and Malling. The previous GTAA evidenced a need for three plots, and it is recommended that this figure remains the projected requirement for new Travelling Showperson plots up to 2040. The GTAA is currently under consideration for review.

Health

3.48 Health is a cross-cutting topic and as such many topic areas explored in this Scoping report influence health either directly or indirectly. In the 2021 Census, 50.7% of the population of Tonbridge and Malling Borough identified themselves as being in very good health, an increase of 2.7% from 48.0% in 2011. The proportion of Tonbridge and Malling residents describing their health as "very bad" remained 0.9%, while those describing their health as "bad" was 3.2% (similar to 2011). It is important to note that the 2021 Census was conducted during the COVID-19 pandemic and so may have influenced how people perceived and rated their health. Approximately 5.9% of people in Tonbridge and Malling Borough are disabled where their day to day activities are limited a lot [\[See reference 60\]](#).

3.49 Table 3.8 below presents health profile highlights for Tonbridge and Malling Borough [\[See reference 61\]](#). Compared to neighbouring authorities and averages for the South East and England, Tonbridge and Malling has a low estimated infant mortality rate, smoking prevalence in adults and under 75 mortality rate from cardiovascular disease. However, Tonbridge and Malling has a higher number of emergency hospital admissions for intentional self-harm than most neighbouring authorities, in addition to the South East and England.

Table 3.8: Health profile highlights for Tonbridge and Malling Borough and neighbouring boroughs/district

Local authority	Infant mortality rate per 1,000 people [See reference 62]	Smoking prevalence in adults (aged 18 and over) (%)	Under 75 mortality rate from cardiovascular disease per 100,000 people	Emergency hospital admissions for intentional self-harm per 100,000 people
Tonbridge and Malling	1.2	3.9	50.4	197.8
Tunbridge Wells	2.1	19.4	60.0	216.7
Gravesham	2.1	15.3	104.6	119.2
Sevenoaks	2.5	5.6	57.9	120.1
Maidstone	3.9	13.4	61.2	227.6
Medway (Unitary Authority)	3.0	12.7	87.7	99.5
South East	3.3	10.6	62.1	125.4
England	4.1	11.6	77.4	117.0

3.50 The rate for alcohol-related harm hospital admissions is 423 per 100,000 people for Tonbridge and Malling, which is better than the average for England (504 admissions per year) [See reference 63].

3.51 Within the Kent and Medway Clinical Commissioning Group (CCG), Tonbridge and Malling Borough is part of the West Kent Integrated Care Partnership (ICP), formerly West Kent CCG. Within the West Kent ICP, there are nine Primary Care Networks (PCNs), four of which overlap with the borough boundary. These PCNs, along with the GP practices they operate within Tonbridge and Malling Borough, are outlined below.

- ABC Network: Aylesford Medical Centre.
- Malling PCN: Phoenix Medical Practice, Snodland Medical Practice, Thornhills Medical Practice, Watringbury Surgery, and West Malling Group Practice.
- Sevenoaks PCN: Borough Green Medical Practice.
- Tonbridge PCN: Hadlow Medical Centre, Hildenborough Medical Group, Tonbridge Medical Group, and Warders Medical Centre.

3.52 Within the borough, there is Tonbridge Cottage Hospital which operates one large ward and an ambulatory care room. Outside of the borough, Tonbridge and Malling residents utilise services in neighbouring local authorities; Maidstone and Tunbridge Wells NHS Trust provides services at Maidstone Hospital and Tunbridge Wells Hospital, Pembury. Hospice care is provided at the Hospice in the Weald (Pembury).

3.53 The West Kent CCG Health Needs Assessment [\[See reference 64\]](#) indicated that the demand for service use for general practice, planned care, urgent and emergency care, and social contacts is expected to rise in excess of the total population growth over the next 25 years.

3.54 There are 16 care homes regulated by the Care Quality Commission in the borough [\[See reference 65\]](#). There are also 14 different services offering specialist support for individuals with autism [\[See reference 66\]](#), and numerous different services offering support for individuals with dementia. There are also eight different foodbanks within the borough [\[See reference 67\]](#). The Royal British Legion Industries located in Aylesford, offers a support for Armed Forces Veterans and their families. The organisation has a range of programmes for Armed Forces Veterans and wider support for individuals over 16 for seeking employment, disability support and back to work guidance.

Life expectancy

3.55 As of 2023, the average female life expectancy in Tonbridge and Malling was 84.4 years and the average male life expectancy was 80.7 years. This is above England’s average life expectancy of 83.0 years and 79.1 years respectively [See reference 68]. A comparison between the life expectancies within Tonbridge and Malling Borough and surrounding local authorities is outlined in Table 3.9 below.

Table 3.9: Life expectancy within Tonbridge and Malling Borough and neighbouring local authorities (in years)

Local Authority	Male	Female
Tonbridge and Malling	80.7	84.4
Tunbridge Wells	80.7	83.9
Gravesham	78.7	83.4
Sevenoaks	81.7	84.8
Maidstone	80.0	83.7
Medway (Unitary Authority)	78.0	82.1
Kent	79.5	83.3
England	79.1	83.0

Obesity and physical activity levels

3.56 Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated that this places a cost of at least £5.1 billion on the NHS and tens of billions on wider UK society every year.

3.57 Within Tonbridge and Malling, the percentage of adults classified as overweight or obese is 63.3%, which is just below the national average of 63.8%. Further to this, 17.4% of children within Year 6 (aged 10-11 years old) in Tonbridge and Malling are identified as obese, which is well below the national average of 22.65% [\[See reference 69\]](#).

3.58 Reporting by Sport England [\[See reference 70\]](#) shows that:

- 18.9% of adults were classed as 'inactive' with less than 30 minutes of recorded activity a week in November 2022-23. This compares to 22.7% in November 21-22 and 24.8% in November 2020-21.
- In November 2022-23, 12.5% of adults were reported as fairly active (30-149 minutes of activity) and 68.6 were reported as active (150 minutes or more of activity).

3.59 Within the borough there are four sportsgrounds: Tonbridge Racecourse Sportsground, Tonbridge Farm Sportsground, Frog Bridge Sportsground and Swanmead Sportsground. Across these four sportsgrounds, there are the facilities for baseball, bowling, football, cricket, rugby, crazy golf, tennis, skateboarding and basketball.

3.60 The delivery of many sport and leisure facilities is managed by the Tonbridge and Malling Leisure Trust. The not-for-profit organisation manages six key facilities across the borough: Larkfield Leisure Centre, Angel Centre, Tonbridge Swimming Pool, Poult Wood Golf Course, The Games Hut at Tonbridge Racecourse Sportsground and bookings for sports pitches in Tonbridge. The Trust also provides for additional specialist needs groups during the week, and offers discounted leisure passes for individuals who are registered as disabled.

Perception of well-being

3.61 Residents of Tonbridge and Malling reported having slightly higher levels of life satisfaction (7.50 out of 10.00) than the UK average (7.45) in the 2022/23

period. Average figures recorded relating to ‘feeling the things done in life are worthwhile’ were higher than the UK (7.93 and 7.73, respectively), while ‘happiness’ in Tonbridge and Malling Borough was marginally higher than the UK (7.57 and 7.39, respectively). Levels of anxiety were recorded at 3.04 for Tonbridge and Malling in this period. This was a decrease of 0.09 from the previous period (2021/2022) [\[See reference 71\]](#).

Open space

3.62 Parks and open spaces are important to the community they serve. They benefit local communities and provide meeting and social spaces, health and wellbeing, the local economy, community and safety, climate cooling and increasing the appearance and profitability of the area. Open spaces provide opportunities for outdoor exercise and offer the opportunity to help increase levels of health and reduce obesity. They also help to maintain good mental health and reduce stress by encouraging relaxation through interaction with the natural environment.

3.63 There are numerous amenity green spaces and natural green spaces across Tonbridge and Malling Borough. Evaluating the provision of these against population statistics in 2011 indicated that there had been a decrease of 0.92% in provision per 1,000 population. Using Fields in Trust Guidance for Outdoor Sport and Play [\[See reference 72\]](#), the provision of children’s and young people’s play areas did not achieve national benchmarks of 0.55ha per 1,000 population.

3.64 Natural England’s Green Infrastructure (GI) Accessible Greenspace Standards [\[See reference 73\]](#) clarify the quantity, quality and location of green infrastructure required to meet local needs. This standard was used in relation to provision within Tonbridge and Malling, and showed that the majority of Tonbridge and Malling Borough is fully provisioned with greenspace, with only a few areas – particularly north of Watlingbury and the central areas of Tonbridge – where there is no provision of greenspace at doorstep or local levels, and at the neighbourhood level [\[See reference 74\]](#).

3.65 The Old Chalk New Downs project funded by the Heritage Lottery Fund, completed in December 2022, has helped to restore the chalk grassland habitat while also connecting communities to the natural environment. The project has supported works at 33 sites across the project area to restore and/or better manage chalk grassland. Habitat improvement works have included the planting of 18,000 trees for hedgerows in winter 2021/22, and shrub clearance across a number of sites [\[See reference 75\]](#).

3.66 Within the borough there is also Haysden Country Park, located in the western outskirts of Tonbridge. It is approximately 65ha and includes a river, grasslands, marshlands, woodlands and freshwater lakes. The park offers activities for young people, in addition to fishing, sailing and open water swimming. Manor Park Country Park managed by Kent County Council is located near West Malling. The park is approximately 21ha, and within this there are four distinct sections: the lake, the Abbey Field and Chestnut Paddocks, the Ice House field, and Douce's meadow.

3.67 Within the borough there is also Leybourne Lakes Country Park located in Aylesford. The park is approximately 93ha and includes multiple lakes, wildflower meadows and wetlands. There are a range of facilities for visitors of the country park including walking routes and guided trails.

3.68 There are two National Landscapes in the borough. The Kent Downs National Landscape is in the north and a small section of the High Weald National Landscape is in the south.

3.69 Due to being largely rural in nature, Tonbridge and Malling Borough benefits from a dense Public Rights of Way network that provides convenient access from settlements to the wider countryside. This allows access to a wide variety of habitats across the borough which can be beneficial to health and well-being.

Deprivation

3.70 Tonbridge and Malling is ranked 236 out of 317 local authorities for overall deprivation, one being the most deprived and 317 being the least deprived. At the neighbourhood level, Tonbridge and Malling contains 72 Lower Super Output Areas (LSOAs), three of which are within the 20% most deprived areas nationally. These are located within East Malling (003A), Trench (009C) and Aylesford South (005A). The lowest ranking LSOA in the borough (003A in East Malling) falls within the 13% most deprived areas nationally. Generally, Tonbridge and Malling is an affluent area, with 16 of the 72 LSOAs within the 10% least deprived areas nationally. The highest ranking area is Tonbridge and Malling 010B within Hildenborough and is within the 1% least deprived areas nationally, highlighting the range of inequality within the borough [\[See reference 76\]](#).

3.71 The IMD sub-domain 'geographical barriers' measures road distance to amenities, including road distance to primary schools, post offices and GP surgeries. The more rural areas within the borough, including areas surrounding Borough Green and Shipbourne, across to Mereworth and up along the western side of Snodland, are shown to have the lowest proximity to these services, suggesting poor accessibility. There are some pockets of improved accessibility across all indicators in Borough Green, Tonbridge, Snodland and West Malling. Approximately 75% of the borough is characterised by poor accessibility scores across all indicators of geographical barriers. However, geographical proximity provides only a partial picture of overall accessibility, as public transport plays an important role in ensuring everyone has equal access to services and facilities, including for households of lower income or hitting financial difficulty.

3.72 The proportion of rough sleepers in Kent by local authority data has increased by 22.3% in the period 2013 to 2023, from 103 to 126. Kent Analytics reported that in 2023, the number of rough sleepers was 0.2 per 10,000 households, equating to a total of 55 households [\[See reference 77\]](#). Compared to the rest of Kent, the estimated number of rough sleepers in Tonbridge and Malling Borough is lower than ten out of the 12 local authorities [\[See reference 78\]](#).

3.73 According to the Index of Multiple Deprivation, Tonbridge and Malling Borough has experienced the largest increase in deprivation relative to other districts in the county [\[See reference 79\]](#). According to a Kent County Council report on Child Poverty from Kent Analytics [\[See reference 80\]](#), there are two districts in the county where there has been an increase in children living in absolute low-income families from 2010/2011 to 2019/2020: Tonbridge and Malling (+4.5%, +115 children) and Tunbridge Wells (+2.5%, +52 children). In total, there are around 9.8% (2,657) children living in absolute low-income families in the borough [\[See reference 81\]](#).

Crime and safety

3.74 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and wellbeing.

3.75 Crime statistics indicate that there is a comparatively lower level of crime in Tonbridge and Malling Borough than the national average.

3.76 There were 8,766 crimes reported in Tonbridge and Malling in the year ending March 2024. This is a 4% decrease when compared to the previous year [\[See reference 82\]](#).

3.77 In March 2023, the ONS Crime Severity Score for total recorded crime in Tonbridge and Malling Borough was 13.0 compared to the national average of 16.4. The offence rate per 1,000 individuals was 60.0, compared to the national average of 93 [\[See reference 83\]](#).

Economy

3.78 Nationally, employment rates continued to increase during 2024. The local employment rate (89.7%) remains considerably above the national rate (78.4%). The local unemployment rate (2.6%) remains below the national figure

(3.7%) [See reference 84]. Table 3.10 provides employment and unemployment rates in Tonbridge and Malling compared to the regional and national rates.

Table 3.10: Employment and unemployment rates

For October 2023-September 2024	Tonbridge and Malling (%)	South East (%)	Great Britain (%)
Employment rate – aged 16-64	89.7	81.9	78.4
Unemployment rate – aged 16-64	2.6	3.5	3.7

3.79 Within Tonbridge and Malling, 70.3% of the economically active population aged 16-64 work full time and 29.7% work part time. In Great Britain, 68.8% work full time and 31.2% work part time.

3.80 In 2022, the total output (Gross Value Added, GVA) in Tonbridge and Malling Borough reached £5,328 million. The trend in GVA has been steadily increasing over the years for the borough [See reference 85].

3.81 The Gross Weekly Pay in 2024 in Tonbridge and Malling for full time workers was £789.50 per week for full time workers which is higher than the regional average (£779.20) and the national average (£729.80). This equates to £41,054 a year in Tonbridge and Malling compared with £40,518 and £37,950 regionally and nationally respectively [See reference 86].

3.82 The UK is currently experiencing a 'cost of living crisis', which refers to the fall in disposable incomes (adjusted for inflation and after taxes and benefits). This began in late 2021, driven by a range of issues from depleted gas supplies in Europe to semiconductor shortages in Asia. Impacts from the pandemic alongside disruptions to global supply chains also increased prices. The main contribution to these increased prices has been the Russian invasion of

Ukraine, which has significantly impacted gas prices as a result of Russia reducing gas sales.

3.83 Since inflation peaked at 11.1% in October 2022, it has gradually been coming down. A rapid increase in energy costs, caused by a rise in the wholesale price of gas has been a key driver in the increases in price level since February 2022. Housing and household services (which include electricity and gas) as well as food and non-alcoholic beverages, made the largest annual contribution to Consumer Prices Index inflation in April 2023. Wage growth since summer 2021 has not sufficiently kept pace with inflation [\[See reference 87\]](#).

3.84 Living costs should be increasing by less than household incomes as inflation rates fall. However, prices will remain high. It will take a long time for household incomes to recover to their previous level in real terms [\[See reference 88\]](#).

3.85 There were an estimated 64,000 jobs in Tonbridge and Malling in 2023 [\[See reference 89\]](#). The proportion of employees in different types of jobs is set out below in Table 3.11: Employee jobs in Tonbridge and Malling Borough in relation to regional and national averages (2023).

Table 3.11: Employee jobs in Tonbridge and Malling Borough in relation to regional and national averages (2023)

Employee Jobs by Industry	Tonbridge and Malling Borough (%)	South East England (%)	Great Britain (%)
Mining and quarrying	0.1	0.0	0.1
Manufacturing	5.5	6.1	7.5
Electricity, gas, steam and air conditioning	0.0	0.3	0.4

Employee Jobs by Industry	Tonbridge and Malling Borough (%)	South East England (%)	Great Britain (%)
Water supply; sewerage, waste management and remediation activities	2.3	0.8	0.7
Construction	7.8	4.9	4.8
Wholesale and retail trade; repair of motor vehicles and motorcycles	17.2	15.0	13.7
Transportation and storage	7.8	4.6	5.0
Accommodation and food service activities	7.0	8.6	8.0
Information and communication	3.5	5.6	4.6
Financial and insurance activities	3.9	2.7	3.4
Real estate activities	2.0	1.7	1.9
Professional, scientific and technical, activities	7.0	9.0	9.3
Administrative and support service activities	10.9	8.0	8.7
Public administration and defence; compulsory social security	4.7	3.5	4.7
Education	7.8	9.8	8.6
Human health and social work activities	7.8	14.0	13.9
Arts, entertainment and recreation	2.7	3.0	2.6
Other service activities	1.4	2.2	1.9

3.86 As of 2023, approximately 43.8% of the population of Tonbridge and Malling have a Level 4 qualification and above (degree (BA, BSc), higher degree (MA, PhD, PGCE), NVQ level 4 to 5, Higher National Certificates, Higher National Diplomas, BTEC Higher level, professional qualifications). This is below than the regional figure for the South East of England at 49.2% and the national figure for England at 47.3% [\[See reference 90\]](#).

3.87 Tonbridge and Malling’s workforce is distributed across a wide range of sectors, with 63% of the working population employed as a manager, director, senior role, professional occupation or associate professional occupation [\[See reference 91\]](#) compared to the South East of England (56.9%) and Great Britain (53.4%) averages [\[See reference 92\]](#), as displayed in Table 3.12.

Table 3.12: Employment by occupation (Oct 2023-Sep 2024)

Occupation	Tonbridge and Malling	South East	Great Britain
1: Managers, directors and senior officials	19.7%	13.2%	11.1%
2: Professional occupations	36.6%	28.6%	26.8%
3: Associate professional and technical occupations	# [See reference 93]	15.0%	15.4%
4: Administrative and secretarial occupations	#	9.0%	9.3%
5: Skilled trades occupations	#	8.7%	8.7%
6: Caring, leisure and other services occupations	#	8.1%	8.3%

Occupation	Tonbridge and Malling	South East	Great Britain
7: Sales and customer service occupations	#	5.4%	6.1%
8: Process, plant and machine operatives	#	4.3%	5.5%
9: Elementary occupations	#	7.5%	8.8%

3.88 Data published from the ONS taken from the 2021 Census indicates that 47.4% of the resident population of Tonbridge and Malling travel to work by a car or van, which is higher than the national average of 44.5%. According to the 2021 Census, 37% of the resident population in employment work mainly from home, which is higher than the national average of 31.5% [\[See reference 94\]](#).

3.89 In 2024, there were 6,060 businesses in Tonbridge and Malling. The majority of these (88.2% or 5,345) were micro businesses which have fewer than ten staff. There were 565 (9.3%) small businesses, 125 (2.1%) medium and 25 (0.4%) large businesses in Tonbridge and Malling Borough [\[See reference 95\]](#).

3.90 In 2023, Tonbridge and Malling introduced plans for an ambitious economic strategy to support businesses, enhance high streets and boost tourism across the borough [\[See reference 96\]](#). The Action Plan, contained within the borough's economic development strategy, [\[See reference 97\]](#) supports the strategy includes initiatives such as:

- Grants and mentoring for West Kent businesses starting in September 2023.
- Green grants for at least 20 local businesses to help cut their carbon footprint.
- Development of proposals for regeneration of Tonbridge town centre.
- Funding for shopfront improvements in retail centres across the borough.

- Marketing Tonbridge and Malling as a tourism destination.

3.91 As of 2025, Tonbridge and Malling Borough Council has begun a major redevelopment of Tonbridge town centre, focusing on Council-owned land and buildings east of the town's high street. The plans include replacement of the Angel Centre, new homes, shops, and a pedestrian town square [\[See reference 98\]](#).

Transport

3.92 Tonbridge and Malling has a well-developed road network that supports connectivity across the borough and surrounding areas. The A228 to A264 road corridor acts as the main spine of the transport network, stretching from Medway towards Tunbridge Wells, and providing access to the M20 and M2 motorways. The M20 also runs through the northern part of Tonbridge and Malling, while the M26 joins the M20 within Tonbridge and Malling, passing through rural areas of the borough. Additionally, the A227 provides a parallel north-south route, from Tonbridge towards Gravesham. Other significant roads, including the A20, A21 and A26, further enhance connectivity, linking towns and villages within the borough while also providing direct routes to London, the South Coast and other parts of Kent.

3.93 However, Tonbridge and Malling's road network faces pressures, particularly due to its proximity to major urban areas like Tunbridge Wells, Maidstone, Paddock Wood and Medway, as well as congestion and delays at junctions within the built-up areas of Tonbridge, Leybourne, Ditton and Aylesford. Schemes have been implemented in some locations across these areas to improve performance of the road network, but the constraints of the built-up area prevent significant changes to the road network. As such, the increasing population will present challenges to reliability and time taken to complete future journeys [\[See reference 99\]](#).

3.94 The borough promotes public transport and walking and cycling routes to help reduce the pressure on the road network from future traffic levels. The

2014-2019 Tonbridge and Malling Cycling Strategy aimed to increase cycle route connectivity from the Tonbridge town centre and station to the surrounding schools and colleges. The strategy aimed to create continuous cycle routes by joining up existing routes and targeting important pathways [See reference 100]. The development of better cycling routes is identified within the Kent County Council's Active Travel Strategy [See reference 101] and the Tonbridge and Malling Cycling Strategy [See reference 102], and the Council is currently working on an Active Travel Strategy [See reference 103]. There has also been the development of the Tonbridge 20mph zone to encourage active modes of travel across the area.

3.95 Cycling infrastructure throughout the borough is generally good, there is a cycle route linking Tonbridge and Penshurst which forms part of the National Cycle Network. A non-motorised unit route, which refers to a pathway designed for pedestrians, cyclists and other non-motorised users links North Farm in Tunbridge Wells and the Vauxhall Roundabout. There is also a recent shared walking/cycling path from Kings Hill to West Malling rail station to improve cycle access for commuters. However, there are some populated areas such as Borough Green and Wrotham which do not have any cycle facilities.

3.96 With regard to rail services, there are nine railway stations with two additional stations along the borough boundary. There are three main railway lines that pass through the borough: the Maidstone Line, the Medway Valley line and the South Eastern Main Line. The closest airport is London Gatwick Airport. Rail services in Tonbridge and Malling are frequent and well-connected. Stations in Tonbridge and Malling on the Maidstone Line, include West Malling and East Malling. These stations provide direct services to London Victoria, Maidstone East and Ashford International. Stations in Tonbridge and Malling on the Medway Valley Line include Snodland, Aylesford and New Hythe. The line primarily offers local services, although connects Strood to Paddock Wood, with onward links to Maidstone and London St Pancras. Tonbridge and Malling railway station has services operated by the South Eastern Main Line, connecting Tonbridge and Malling to London Charing Cross, London Bridge, and Cannon Street. The line also offers connections to surrounding boroughs, including Sevenoaks and Tunbridge Wells, making it a vital transport link for both local and regional travel.

3.97 Most bus routes are operated on a commercial basis; however, some routes are partially funded by Kent County Council. There are regular bus services within the borough as well as services connecting Tonbridge and Malling Borough to neighbouring towns. However, some smaller bus operators which serve smaller populations, such as Borough Green, do not operate seven days a week.

3.98 The 2021 Census data on method of travel to work reported that a slightly higher percentage (47.4%) of individuals travel by car to work than the national average (44.5%) (Figure 3.1). Fewer individuals utilise public transport networks and active modes of transport. The commuting figures (Figure 3.2) show that 25.3% of the resident population travel less than 10km to work. There has been a noticeable shift towards working from home during and in the aftermath of the COVID-19 pandemic, with 37.0% of the resident population in employment in Tonbridge and Malling Borough working mainly from home, which is higher than the national average of 31.5% [\[See reference 104\]](#). Additionally, 15.6% of residents in Tonbridge and Malling commute between 10km and 30km, which is slightly higher than the national average of 14.4%. The borough's strong connectivity to neighbouring areas and employment hubs, such as Maidstone, Tunbridge Wells and London, is supported by key routes like the A20, A21 and A228, which provide access to major motorways including the M20 and M2. This well-developed transport network facilitates longer commutes, even though specific destinations are not detailed in the data.

3.99 Based on 2021 Census data, 65,878 Tonbridge and Malling residents work within the borough. This includes 33,610 who work from home and 11,585 who commute locally. Additionally, 20,683 people travel into Tonbridge and Malling for employment, the largest number coming from Maidstone (6,024), followed by Medway (4,483 people) and Tunbridge Wells (2,656 people). In terms of outflow, a total of 19,233 residents travel out of the borough for work. 3,724 residents commute to Maidstone, followed by 3,176 people to Tunbridge Wells and 2,772 people to Sevenoaks for work. This data underscores Tonbridge and Malling's relatively strong local employment base but also the need for a substantial proportion of residents to travel to other locations for work. The borough's good connectivity to employment hubs in areas such as Maidstone,

Tunbridge Wells, Colchester and London supports the level of out commuting recorded [\[See reference 105\]](#).

Figure 3.1: Method of travel to workplace in Tonbridge and Malling

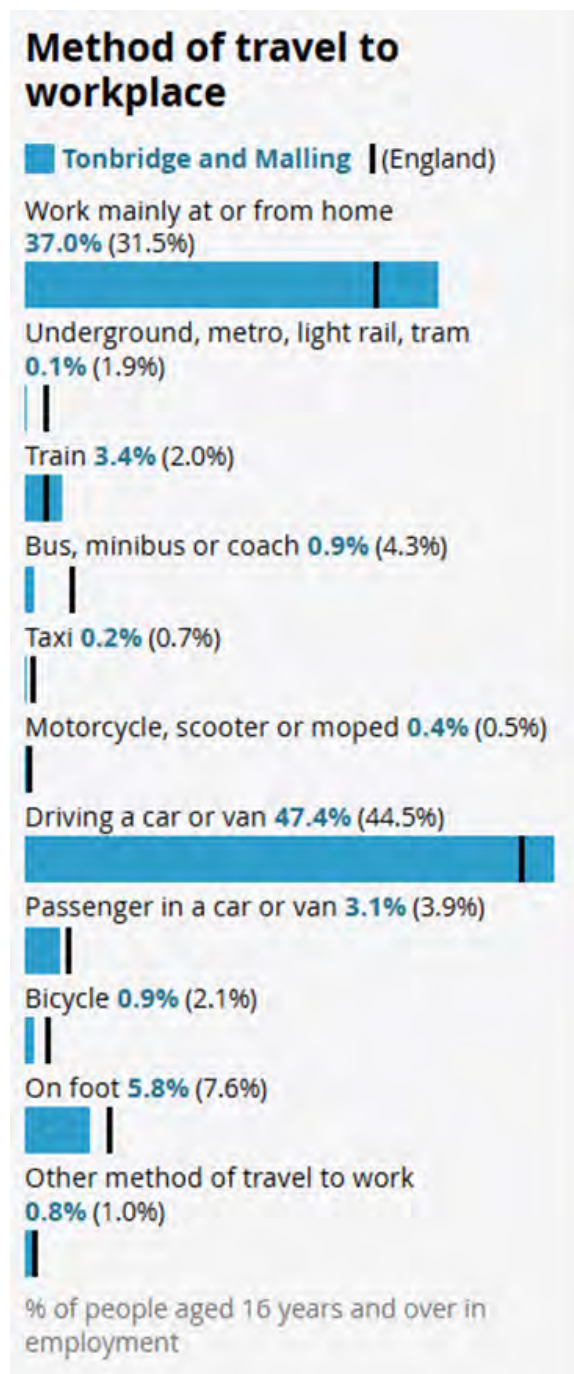


Figure 3.2: Distance travelled to work in Tonbridge and Malling Borough



Land and water resources

Geology and minerals

3.100 The soilscape within Tonbridge and Malling Borough has four key varieties. Surrounding the north of Tonbridge, the soil is loamy with high groundwater. To the east of Tonbridge, the soil is freely draining, slightly acidic and loamy, and is also found towards the southern boundary of the borough. The central area of the borough is characterised by two distinct soil types: slightly acidic loamy and clayey soil that is slowly permeable, and slightly acidic loamy and clayey soil that is freely draining.

3.101 The bedrock geology of the borough is characterised by two key bedrock geologies. The northern area of the borough largely comprises Lower Greensand Group, which is sandstone and mudstone. The southern area within the borough largely comprises Wealden Group mudstone, siltstone and sandstone, with some areas of siltstone and sandstone. The superficial geology of the area is largely within the southern boundary, with some areas of River Terrace deposits of sand and gravel.

3.102 Regionally important geological and geomorphological sites (RIGS) are locally designated sites of regional and local importance for geodiversity. Within the borough, there are nine RIGS identified. These are primarily located in the northern areas of Wealden Greensand and the North Downs. The location of regionally important geological sites is shown within Figure 3.3.

3.103 The Kent Minerals and Waste Local Plan 2013-30 [\[See reference 106\]](#) identifies a Strategic Site for Minerals at Medway Cement Works, Holborough, which contains sufficient reserves to meet the at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln. The adopted Tonbridge and Malling Development Plan does not identify any land within or adjacent to the allocated area that constitutes the Strategic Site for Minerals that would conflict with the safeguarding of this site [\[See reference 107\]](#).

Water

3.104 There are several aquifers concentrated around Aylesford and Snodland which are used for abstractions for public water supply. There are over 100 licensed abstraction points. The borough's drinking water is supplied by South East Water [\[See reference 108\]](#). As a portion of the drinking water is abstracted from the groundwater, the Environment Agency has outlined Source Protection Zones (SPZs) to safeguard public drinking water sources from contamination. SPZs are defined around large and public potable groundwater abstraction sites and they provide additional protection to safeguard drinking water quality by constraining the proximity of an activity that can impact the

quality of drinking water. The borough's SPZs include large areas of Zone 3, to the north of the borough, particularly around West Malling and Snodland, where groundwater is abstracted for public water supply [\[See reference 109\]](#).

3.105 Tonbridge and Malling Borough is within the Medway Management Catchment, and more specifically the Medway Middle Operational Catchment. The River Medway flows through the borough from Tonbridge town centre in a north-easterly direction and is fed by several small rivers and streams. The other main surface water feature is the River Bourne which flows from the vicinity of Borough Green southwards towards East Peckham [\[See reference 110\]](#).

3.106 In 2013, the Tonbridge and Malling Stage 1 Surface Water Management Plan identified the main rivers within the borough [\[See reference 111\]](#). Main rivers are identified by the Environment Agency and are usually larger rivers or streams where the Environment Agency carries out maintenance, improvement or construction work to manage flood risk.

3.107 There are 12 main rivers within the borough across two Catchment Flood Management Plans: (1) the North Kent Rivers; and (2) the Medway. These main rivers are listed below, and their spatial extent is illustrated on 4:

- River Medway;
- River Bourne;
- Hilden Brook;
- Little Hawden Stream;
- Pen Stream;
- Tonbridge Mill Stream;
- Coult Stream;
- Medway Tidal and Estuary;
- Snodland Mill Stream;
- Southborough Stream;

- Alder Stream; and
- Ditton Stream.

3.108 In 2022, across the Medway Middle Operational Catchment, the majority of water bodies were classified as being of 'Moderate' ecological status or potential status, with no water bodies classified as 'Good' or 'High'. Further to this, in 2019, all the surface water bodies in this operational catchment were classified as 'Fail' for the chemical status [\[See reference 112\]](#). In 2022, the surface water bodies were not assessed. This is due to the fact the priority substances and other specific pollutants are not discharged in significant enough quantities into the respective waterbodies [\[See reference 113\]](#).

3.109 Groundwater vulnerability maps identify how vulnerable groundwater sources are to pollution according to hydrological, geological, hydrogeological and soil properties in the vicinity. The 2017 Groundwater Vulnerability Maps published by the Environment Agency indicate that the groundwater surrounding Tonbridge town centre is a combination of high to medium/high vulnerability. There are further areas of this high level of vulnerability towards the north of the borough around West Malling and Borough Green. The central area of the borough is characterised by low and unproductive groundwater classification [\[See reference 114\]](#).

3.110 Southern Water is responsible for The River Medway Catchment Drainage and Wastewater Management Plan. This involves the management of sewerage catchments and associated pollution incidents. Some of the more northerly areas of the borough are managed by Thames Water.

Flood risk

3.111 Although flood risk is centred around and caused through water environment features, the net effect of flooding can be argued to be mainly on people and where they live and work, affecting homes, communities and infrastructure. One of its main effects is on health, whether this is the safety of residents and others, physical injury (or even death) or lost access to healthcare

and emergency services, or people's mental health due to the impacts and recovery from flooding.

3.112 Flood risk is a cross-cutting theme as well in terms of how it affects the natural environment and the economy and is exacerbated by climate change.

3.113 While most of Tonbridge and Malling Borough falls within Flood Zone 1 (0.1% annual probability of flooding), there are several areas which are within Flood Zones 2 (0.1% to 1% annual probability of flooding) and 3 (more than 1% annual probability of flooding), which means there is a high probability of flooding from rivers and the sea. The areas of Flood Zone 3 are located on land adjacent to the River Medway and its associated tributaries. This high flood risk encapsulates urban areas within Tonbridge and Malling Borough, including the town of Tonbridge in the south and the Medway Gap and Snodland in the north [\[See reference 115\]](#). In the borough, there are a total of 5,171 dwellings in areas considered to be at risk from tidal or fluvial flooding, of which 2,784 are at a medium-high risk of flooding. Notably, East Peckham has 612 dwellings at risk, Aylesford has 488, and Tonbridge has 475 [\[See reference 116\]](#).

3.114 Surface water flooding also poses a significant risk across the borough, alongside the threat of fluvial flooding. Additionally, the River Medway, north of Allington Lock, is susceptible to tidal flooding, further increasing flood risk in the area.

3.115 The flood risk zones in Tonbridge and Malling Borough are shown in Figure 3.5.

3.116 There are a number of flood alleviation schemes throughout the borough. The Leigh Flood Storage Area (FSA) was completed in 1982, and is situated between the villages of Leigh and Penshurst in Kent. When full, it covers approximately 278 hectares. It is formed of a 1.3 kilometre long, five metre high earth embankment across the Medway Valley. The Leigh FSA is of particular importance to Tonbridge and Malling as the River Medway represents the greatest flood risk in the borough, particularly in the southern areas. The Environment Agency is responsible for maintaining and operating the Leigh

FSA. Between spring 2021 and December 2022, the Environment Agency carried out works to maintain the Leigh FSA. These works will ensure that the storage area continues to safely reduce flood risk to Tonbridge and Hildenborough in the future and should also reduce the risk of flooding further downstream in East Peckham [\[See reference 117\]](#).

3.117 Additional schemes in the borough include the Leigh expansion and Hildenborough embankment scheme, which began construction in spring 2024, and is expected to be fully operational by the end of 2025. The scheme seeks to reduce the risk of flooding for more homes in the area through increasing the capacity of the Leigh FSA and constructing a new embankment to protect homes in Hildenborough [\[See reference 118\]](#).

3.118 The climate in Tonbridge and Malling is expected to change, presenting a series of risks for the borough. Climate change is estimated to result in milder wetter winters and increased summer rainfall intensity. This combination will increase the pressure on existing sewer systems effectively reducing their design standard, leading to more frequent flooding.

Air quality

3.119 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas. Air pollution is the largest environmental risk to public health in the UK [\[See reference 119\]](#). Poor air quality is associated with approximately 28,000 and 36,000 deaths a year nationally. It is estimated that nationally, the total cost for the NHS and social care system will be £1.6 billion between 2017 and 2025 for air pollutants (fine particulate matter and nitrogen dioxide) [\[See reference 120\]](#).

3.120 The Tonbridge and Malling Borough Air Quality Annual Status Report [See reference 121] indicates that the main source of air pollution within the borough is NO₂, generated as a result of road traffic from main A roads and the M20. Consequently, five Air Quality Management Areas (AQMA) have been declared, relating to emissions from motor vehicles.

3.121 These AQMA are outlined below and illustrated in Figure 3.6:

- Tonbridge High Street AQMA;
- Watlingbury AQMA;
- Aylesford AQMA;
- Larkfield AQMA; and
- Borough Green AQMA.

3.122 The main pollutant of concern in the borough is NO₂. However, NO₂ has decreased over the year 2023, with all five AQMA in Tonbridge and Malling now below the 40µg/m³ limit. Watlingbury AQMA has for the first time since its creation dropped below the 40µg/m³.

3.123 Following completion of the M20 widening in 2020, AQMA 1 (M20) was revoked in August 2024, as it remained below 10% of the NO₂ annual objectives for at least six years of monitoring. Additionally, Tonbridge High Street AQMA, Aylesford AQMA, Larkfield AQMA and Borough Green AQMA will be reviewed once 2024 data is available, with potential revocation in 2025, provided pollutant levels remain stable. This would require four consecutive years of readings below the objective limit and at least three years below 10% of the limit, excluding the COVID-19 years (2020-2021). Borough Green AQMA has been within 10% of the limit for the first two of the six years it has been monitored for compliance.

Soils

3.124 The Agricultural Land Classification [\[See reference 122\]](#) provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be the best and most versatile agricultural land.

3.125 According to Agricultural Land Classification Grades – Post 1988 published by Natural England and most recently updated in 2024 [\[See reference 123\]](#), most of the agricultural land in Tonbridge and Malling Borough is classified as Grade 3 – 'Good to Moderate'. There are also some areas of Grade 2 'Very Good' with small areas of Grade 1 'Excellent' agricultural land around West Malling, Borough Green and Watlingbury.

3.126 The Council has a duty to prepare, maintain and publish a Brownfield Land Register. This register is a list of previously developed sites that are under construction for residential development, have planning permission for residential development or may be suitable for residential development. As of 2019, there are a total of 26 sites on the Brownfield Register [\[See reference 124\]](#). However, not all of these sites are deliverable and nor have they been granted planning permission.

Contaminated land

3.127 Under Part IIA of the Environmental Protection Act 1990, Tonbridge and Malling Borough Council is responsible for regulating contaminated land. This requires surveying Tonbridge and Malling Borough, determining contaminated land, ensuring a solution is found, and identifying who should bear the costs of the solution.

3.128 In accordance with Section 78R of the Environmental Protection Act 1990, the Council is also required to maintain a public register of contaminated land, which serves as a permanent record of all regulatory action undertaken to ensure remediation of any site that has been classified as contaminated. There are currently no entries on the public register.

3.129 The definition of contaminated land from Part IIA Environmental Protection Act 1990 (as amended), Section 78A is: "...any land which appears to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that:

- significant harm is being caused or there is a significant possibility of such harm being caused; or
- significant pollution of controlled waters is being, or is likely to be, caused."

3.130 Local authorities are required to take a strategic approach in inspecting their area and are required to publish this as a part of a written strategy. A guide for development on potentially contaminated land for Tonbridge and Malling was published in 2004, with the most recent revision in 2016. The purpose of this guide is to provide developers, planning agents and other applicants with details of the information required by local authorities for sites that may be affected by land contamination or for when sensitive end uses are introduced to a site [\[See reference 125\]](#).

3.131 The 2016 Tonbridge and Malling Borough Council Contaminated Land Strategy states that previous desk-based studies identified approximately 600 potential areas of contaminated land from sites of current or former industrial,

commercial, or other use. These sites are primarily located around the industrial areas of Tonbridge, Snodland and Aylesford.

3.132 There are multiple current and historic landfill sites within the borough. Current landfill sites are defined as permitted waste sites that are currently authorised by the Environment Agency under the Environmental Permitting Regulations. Historic landfill sites are sites where there is no environmental permit in force. There are 15 current landfill sites and 54 historic landfill sites within the borough, as illustrated in Figure 3.7 [\[See reference 126\]](#).

Waste

3.133 The Minerals and Waste Local Development Framework is the responsibility of Kent County Council. Minerals Consultation Areas cover the Minerals Safeguarding Areas, with additional areas to ensure that consultation takes place between county and district/borough planning authorities.

3.134 There are 48 sites listed under the Kent County Council registered minerals and waste sites in Tonbridge and Malling Borough. Kent County Council Kent Minerals and Local Plan 2013-2030 [\[See reference 127\]](#) outlines measures to be taken to achieve the objective of ensuring that as much waste as possible is recycled. Throughout the plan period, the spatial vision for minerals and waste in Kent is that minerals and waste development will make a positive and sustainable contribution to the Kent area and assist with progression towards a low carbon economy [\[See reference 128\]](#).

3.135 The five year review of the Minerals and Waste Local Development Framework by Kent County Council demonstrated a cumulative annual increase in consented capacity across all waste streams. By 2020, there were over two million tonnes per annum of additional capacity across all waste streams [\[See reference 129\]](#).

3.136 There are 32 recycling sites located across Tonbridge and Malling Borough. Between 2022 to 2023, a total of 49,359 tonnes of waste was

collected in the borough, of which 49,335 tonnes consisted of household waste. Of this household waste, 47.8% was sent to be recycled, composted or re-used, resulting in 52.2% of waste not being recycled. This is higher than the regional average recycling rate of 45.4% for the South East of England and the national recycling rate of 43.3% for England [\[See reference 130\]](#).

3.137 Tonbridge and Malling's high recycling rate is largely due to a significant reduction in waste sent to landfill, driven by the recent opening of Kent Enviropower (Energy from Waste) facility in Allington [\[See reference 131\]](#). The Council aims to increase the level of household waste which is recycled, composted or re-used to 54% in 2025/26, in addition to reducing the overall mass of waste through minimisation of packaging. Notably, the Council already achieved a 52% recycling rate in 2024/25, demonstrating steady progress towards its target [\[See reference 132\]](#).

3.138 There is one household waste recycling centre located in Tonbridge and Malling Borough: Allington Household Waste Recycling Centre. There are some other household waste recycling centres located in the neighbouring boroughs of Sevenoaks, Tunbridge Wells, Medway and Maidstone.

Biodiversity and geodiversity

3.139 Tonbridge and Malling has a number of sites designated for their environmental sensitivity. This includes two Special Areas of Conservation (SAC) within the northern area of the borough, North Downs Woodland SAC and Peters Pit SAC. SACs are protected areas in the UK, designated under the Conservation of Habitats and Species Regulations 2017 to conserve habitats and species considered to be most in need. North Downs Woodland is approximately 287 hectares in size; however only part of this SAC is within the borough. Peters Pit is the second SAC within the borough and is much smaller with an area of 28.3 hectares.

3.140 There are 11 Sites of Special Scientific Interest (SSSIs) wholly or within the borough, the largest of which are Halling to Trottiscliffe Escarpment (600.6

hectares in total) and Holborough to Burham Marshes (149.8 hectares in total). Peters Pit SAC is also a SSSI [\[See reference 133\]](#).

3.141 There are currently 47 Local Wildlife Sites (LWSs) in the borough, the largest of which is Mereworth Woods in the middle of the borough [\[See reference 134\]](#). Within the borough, there are two Local Nature Reserves (LNRs): Ditton Court Quarry Nature Reserve located towards Ditton in the north-east of the borough and Haysden Nature Reserve which includes Barden and Haysden Lakes, located in the south-west of the borough [\[See reference 135\]](#).

3.142 The international, national and local designated sites within the borough are outlined below, along with their Natural England citations where appropriate. The location of these sites is shown in Figure 3.8.

3.143 The borough also contains numerous habitats and species of principal importance (priority habitats), which include deciduous woodland, lowland dry acid grassland and traditional orchards. Defra's list of habitats and species of principal importance in England includes these priority habitats.

European Sites within Tonbridge and Malling Borough

North Downs Woodland SAC

- Location: Parcels North of Snodland and East of the A229
- Qualifying Features: Semi-natural dry grasslands and scrubland facies: on calcareous substrates (Festuco-Brometalia); Dry grasslands and scrublands on chalk or limestone. Asperulo-Fagetum beech forests; Beech forests on neutral to rich soils. Taxus baccata woods of the British Isles; yew-dominated woodland.

Peters Pit SAC

- Location: North of Burham
- Qualifying Features: Great crested newt; *Triturus cristatus*.

National Sites within Tonbridge and Malling Borough

Wouldham to Delting Escarpment SSSI

- Location: North-east (east of Burham)
- Qualifying Features: 10km of chalk escarpment north of Maidstone including representative examples of woodland, scrub and unimproved grassland habitats on chalk which support a number of rare and scarce species of plants and invertebrates.

Wateringbury SSSI

- Location: East (south of Wateringbury)
- Qualifying Features: The site contains a tufa deposit (soft calcium carbonate commonly precipitated by springs which have flowed through chalk or limestone). It is important for Quaternary studies.

Trottiscliffe Meadows SSSI

- Location: North (south of Trottiscliffe)
- Qualifying Features: The site is one of the few remaining examples of unimproved meadow in Kent and it supports several species scarce in the country. Increasingly uncommon habitat due to ploughing or draining of fields.

Peter's Pit SSSI

- Location: North (north of Burham)
- Qualifying Features: An old chalk quarry with adjoining soil-stripped fields on the North Downs, with scattered ponds situated amongst grassland, scrub and woodland. The ponds support great crested newt breeding populations.

One Tree Hill and Bitchet Common SSSI

- Location: West (north of Shipbourne)
- Qualifying Features: Site comprises an extensive area of woodland of varied composition on the Lower Greensand. Some plants and invertebrates of restricted distribution are present.

Oldbury and Seal Chart SSSI

- Location: West (west of Borough Green)
- Qualifying Features: The site lies within the Kent Downs Area of Outstanding Natural Beauty. It contains acidic sessile oak woodland of ancient origin, relict heathland communities, recently derived secondary woodland and over 250 species of fungi.

Houlder and Monarch Hills Pits, Upper Halling SSSI

- Location: North (north of Holborough)
- Qualifying Features: Upper Halling is important for Quaternary studies. Variations in the faunal assemblages together with associated lithological changes provide a valuable record of Late-glacial environmental history in South East England.

Holborough to Burham Marshes SSSI

- Location: North (west of Burham)
- Qualifying Features: The site lies along the flood plain of the River Medway. A variety of habitats are present which support breeding birds and wintering wildfowl and waders.

Halling to Trottiscliffe Escarpment SSSI

- Location: North-west (north of Snodland)
- Qualifying Features: Site consists of an extensive area of the North Downs west of the Medway Gap. The site is representative of Chalk grassland in west Kent and beech woodland on the chalk.

Bourne Alder Carr SSSI

- Location: West (south of Borough Green)
- Qualifying Features: The site is a representative example of Wealden valley alderwood, with a rich flora including several locally distributed plants.

Aylesford Pit SSSI

- Location: East (north of Aylesford)
- Qualifying Features: The pit dates back over a century providing exposures of Medway Terrace deposits overlying (Cretaceous) Folkestone Beds.

Local Nature Reserves within Tonbridge and Malling Borough

Ditton Quarry LNR

- Location: North-east
- Qualifying Features: Area of open space providing habitat for wildlife and birds.

Haysden LNR

- Location: South-west
- Qualifying Features: Includes a variety of natural habitats including, grassland, freshwater lakes, marshland and woodland.

Historic environment

3.144 The built heritage and historic landscapes of Tonbridge and Malling are an important element in providing a sense of place and civic pride for residents and visitors.

3.145 In terms of key assets in the historic environment, Tonbridge and Malling has:

- 60 conservation areas;
- 1,318 listed buildings;
- 25 scheduled monuments; and
- 5 registered parks and gardens.

3.146 Across the borough there are 60 conservation areas; these are buildings, spaces and landscapes which contribute to the area's architectural and historic character. These areas are protected under additional legislation, therefore any future development within proximity of or within these areas is subject to additional planning controls [\[See reference 136\]](#).

3.147 Some heritage assets, non-designated heritage assets, archaeological sites, historic buildings, parks, formal gardens or battlefields, are considered to be of national importance. Non-designated heritage assets include a list of local heritage assets that do not meet the strict criteria for national designation but are of local importance.

3.148 The designated heritage assets within Tonbridge and Malling Borough can be seen in Figure 3.9.

Heritage at risk

3.149 Historic England has a Heritage at Risk Register [\[See reference 137\]](#) which includes historic buildings, sites and conservation areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair.

3.150 Within the borough, four heritage assets were identified on the Historic England Heritage at Risk Register [\[See reference 138\]](#). The condition of these assets ranges between 'poor' to 'extensive significant problems'.

3.151 The heritage assets on Historic England's Heritage at Risk Register and their condition are set out below:

- **Church of All Saints, Snodland:** Grade I; Condition – Poor.
- **Town Banks, Tonbridge:** Scheduled Monument; Condition – Generally unsatisfactory with major localised problems.

- **Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles, Aylesford:** Scheduled Monument; Condition – Extensive significant problems.
- **Chapel of St Blaise, Offham:** Scheduled Monument; Condition – Generally unsatisfactory with major localised problems.

Landscape

3.152 National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in the area. NCAs follow natural lines in the landscape instead of administrative boundaries.

3.153 There are four NCAs within the borough: High Weald, Low Weald, Wealden Greensand and North Downs [[See reference 139](#)].

3.154 Two National Landscapes designated by Natural England partially fall within the borough boundary. The Kent Downs National Landscape is situated along the northern and western boundaries of the borough, and there is a small area of the High Weald National Landscape in the south of the borough. Both National Landscapes have Management Plans adopted by the Council. Combined, the National Landscapes constitute approximately 26% of the borough [[See reference 140](#)]. Figure 3.10 shows the location of the National Landscapes within the borough.

3.155 The Landscape Character Assessment 2020 of the Kent Downs National Landscape [[See reference 141](#)] identifies six key landscape character types within the National Landscape. These are:

- LCT 1: Chalk Downs
- LCT 2: Chalk Scarps and Vales
- LCT 3: Chalk Cliffs and Coast

- LCT 4: River Valleys
- LCT 5: Greensand
- LCT 6: Low Weald

3.156 Across the National Landscape, landscape management is generally positive. There have been a number of landscape enhancement initiatives, including Higher Level Stewardship schemes, projects to revert arable land to grassland, extensive woodland management projects, community orchard projects, and landscape enhancement schemes (such as hedgerow and woodland planting) as mitigation/compensation for High Speed 1. There is, however, increased pressure from development outside the National Landscape, which has impacts on the landscape such as increased light pollution, traffic and recreation pressure, with impacts on tranquillity.

3.157 Approximately 11% of the borough is covered by Ancient Woodland, equating to 2,621 hectares. The 2012 Kent Habitat Survey recorded the condition and extent of natural habitats in Tonbridge and Malling Borough. The survey reported that Tonbridge and Malling Borough land cover was largely characterised by grassland, arable land and built development, and this land cover composition had remained relatively stable since 1990 [\[See reference 142\]](#).

3.158 The Landscape Assessment of Kent outlines that the borough is classified into 32 LCAs as shown on Figure 3.11.

3.159 Approximately 71.1% of the borough is covered by the Metropolitan Green Belt [\[See reference 143\]](#). Figure 3.12 illustrates the extent of the borough designated as Green Belt.

Difficulties and data limitations

3.160 Schedule 2(8) of the SEA Regulations requires the environmental report to include "...a description of how the assessment was undertaken including

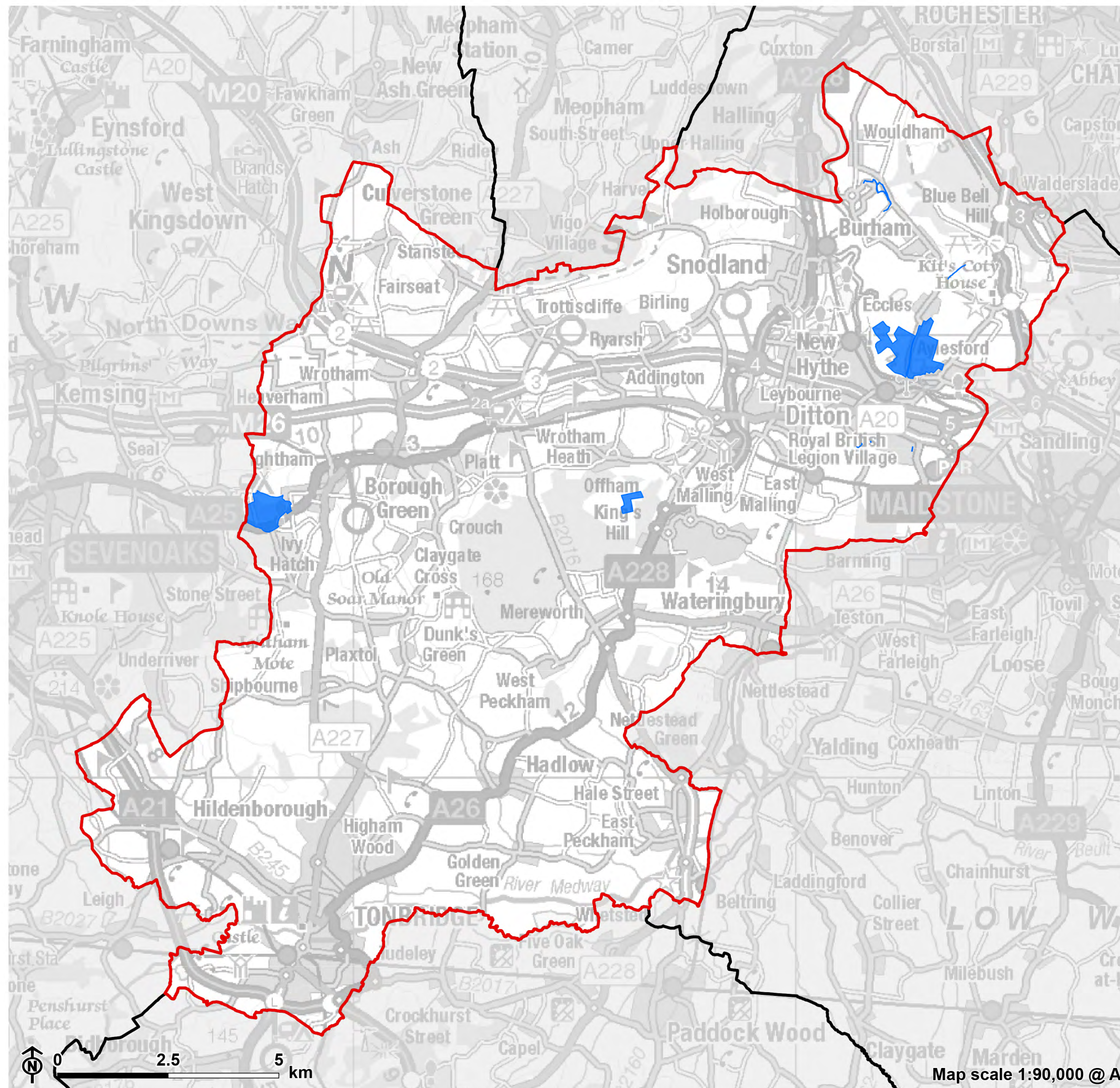
any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information”.

3.161 At this stage, given the content and purpose of the SA Scoping Report, it is considered appropriate to note the following data limitations which were identified as the report was prepared:

- 2021 Census data on transport is available, but not representative of usual times, due to the COVID-19 pandemic.
- Data was not available on existing services and facilities outside of/close to Tonbridge and Malling.
- Tonbridge and Malling Borough Council is currently in the process of updating numerous evidence base documents. This information will be reflected in the SA as and when it becomes available, throughout the plan-making process.

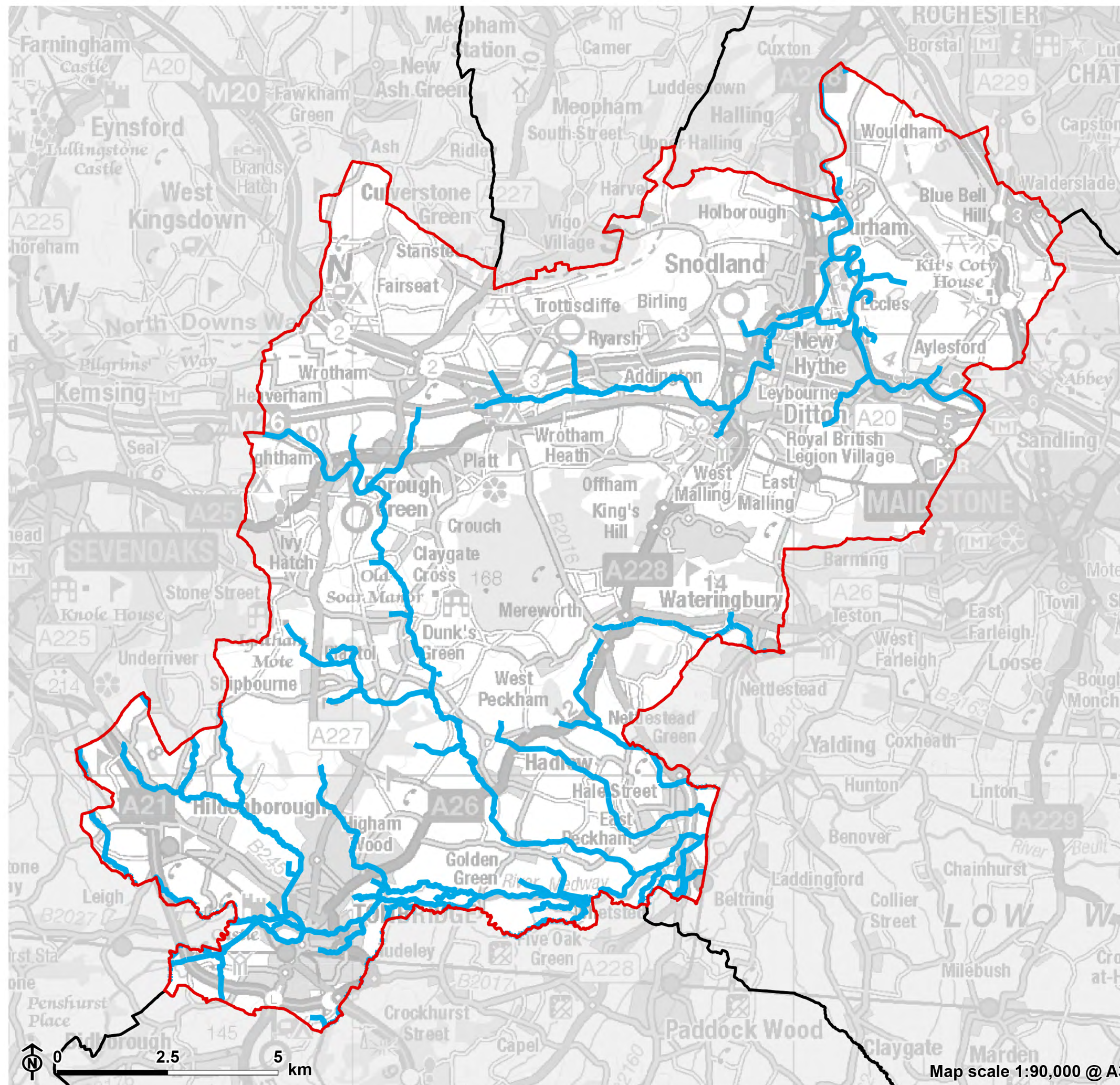
3.162 Where data limitations have been identified, if relevant updates sources become available at a later stage of the SA process, they will be used to update the baseline information informing the appraisal work.

Figure 3.3: Regionally Important Geological Sites



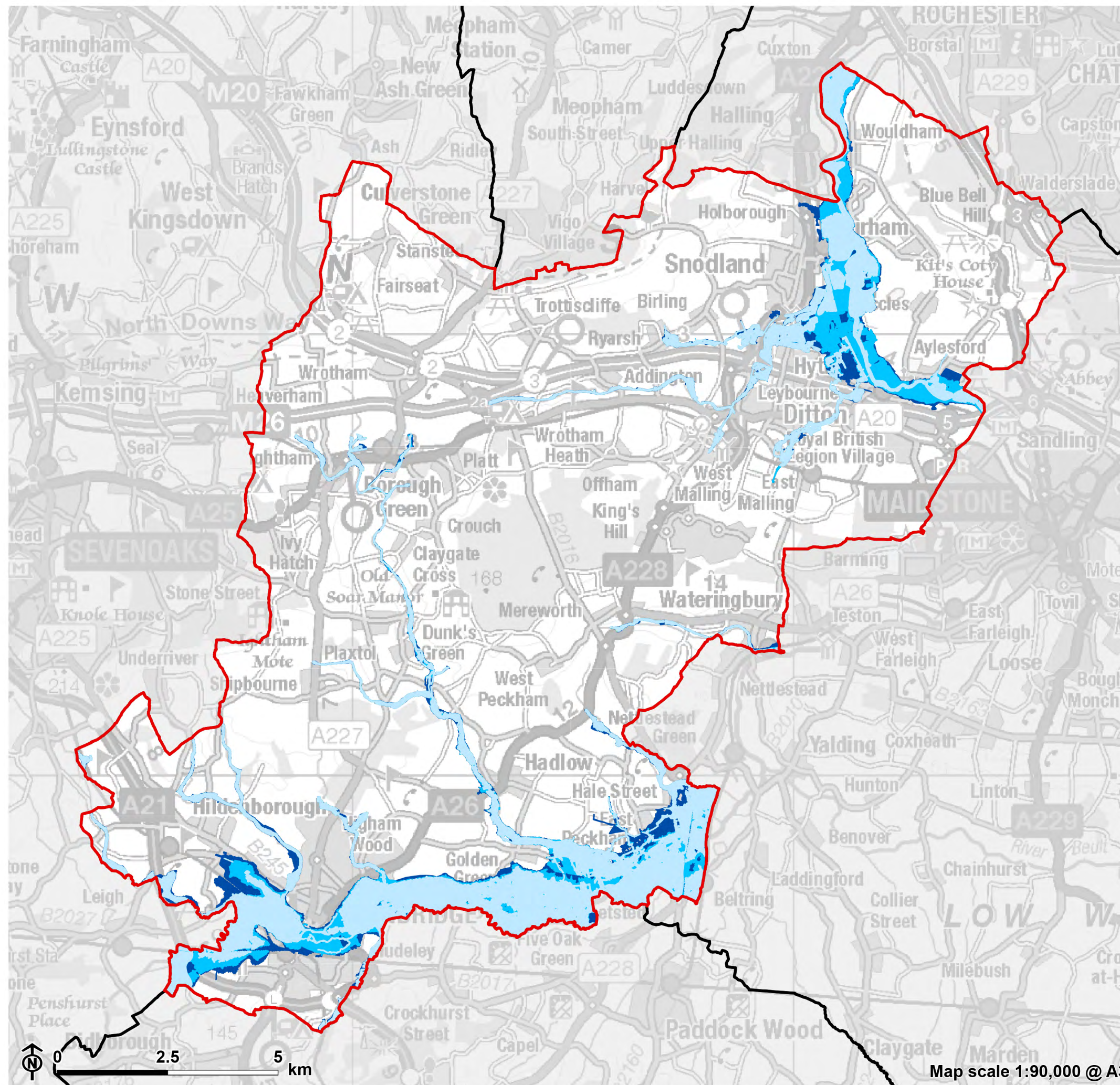
- ▬ Tonbridge and Malling boundary
- ▬ Neighbouring local authority
- Regionally Important Geological Site (RIGS)

Figure 3.4: Main rivers



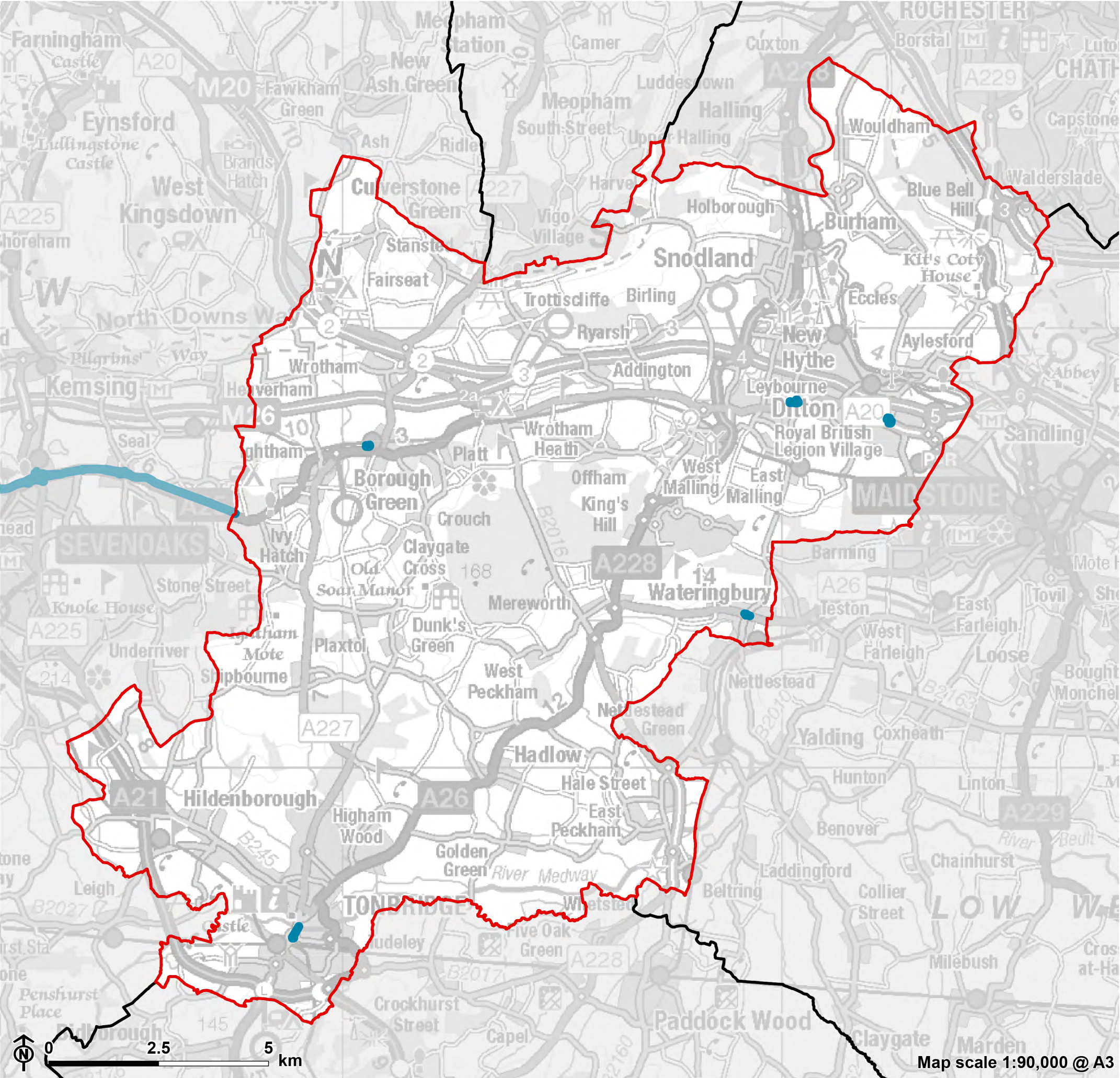
- ▬ Tonbridge and Malling boundary
- ▬ Neighbouring local authority
- ▬ Main river

Figure 3.5: Flood risk zones



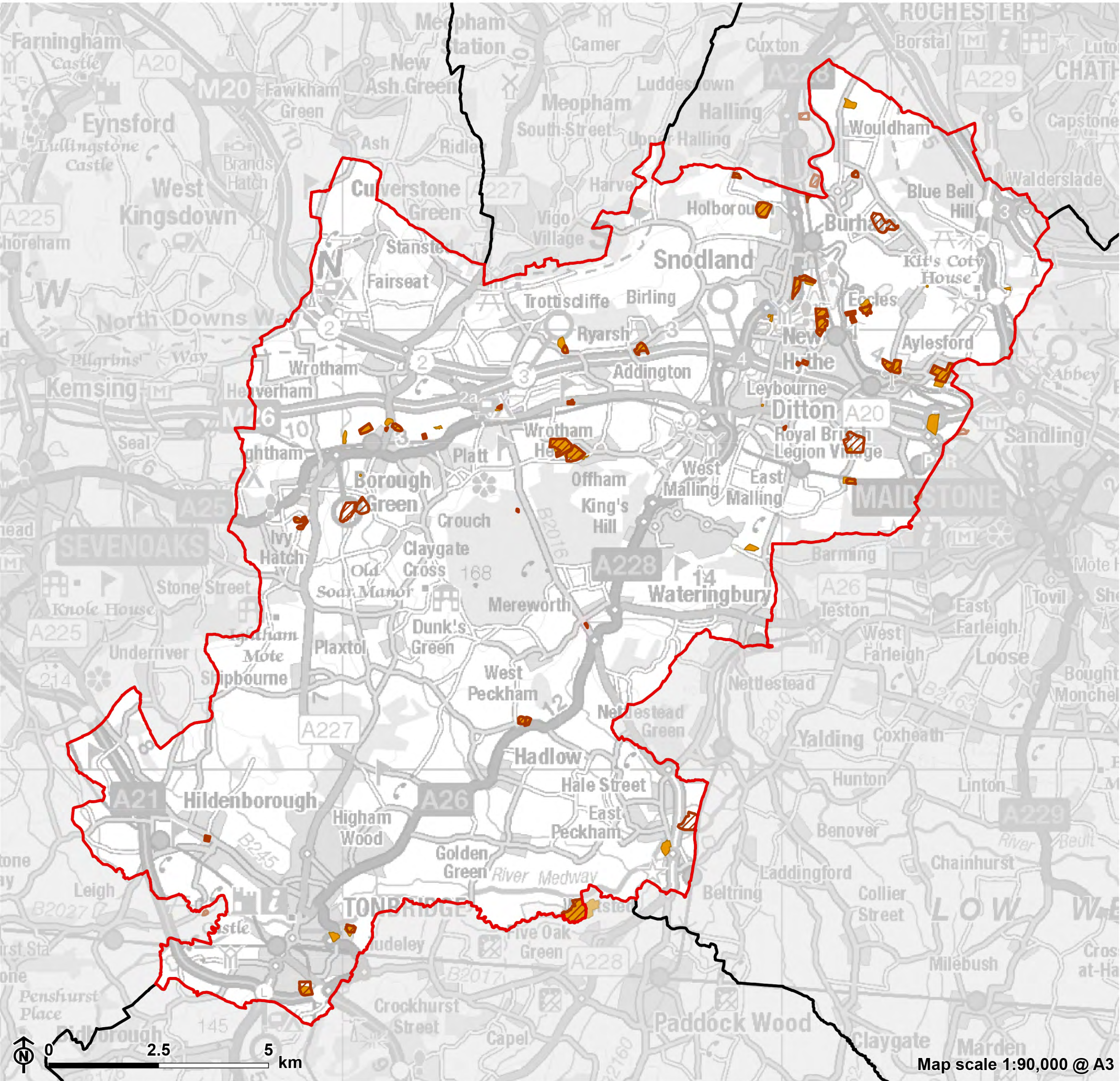
- Tonbridge and Malling boundary
- Neighbouring local authority
- Flood Zone 2
- Flood Zone 3a
- Flood Zone 3b

Figure 3.6: Air Quality Management Areas



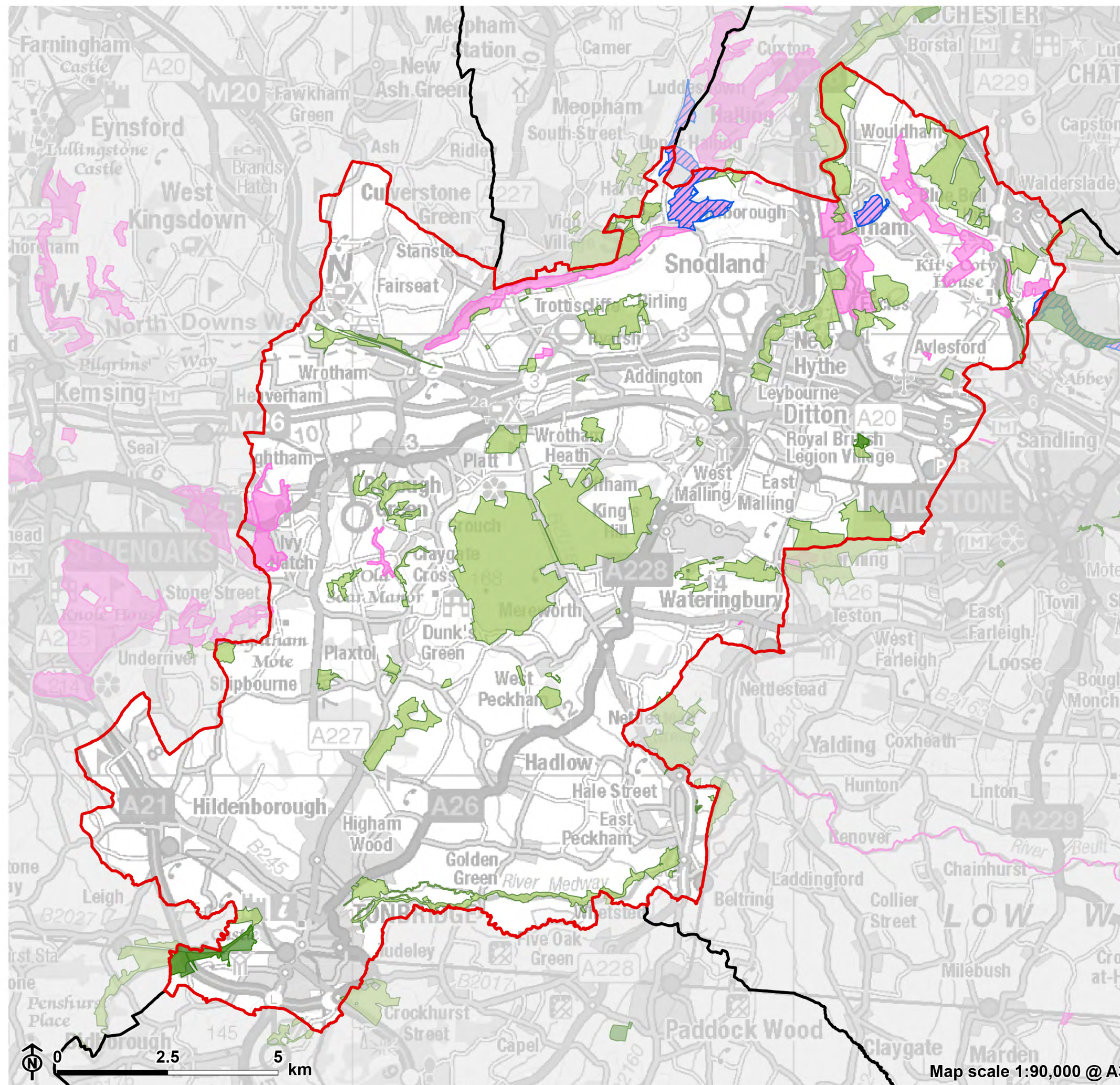
- Tonbridge and Malling boundary
- Neighbouring local authority
- Air Quality Management Area (AQMA)

Figure 3.7: Landfill sites



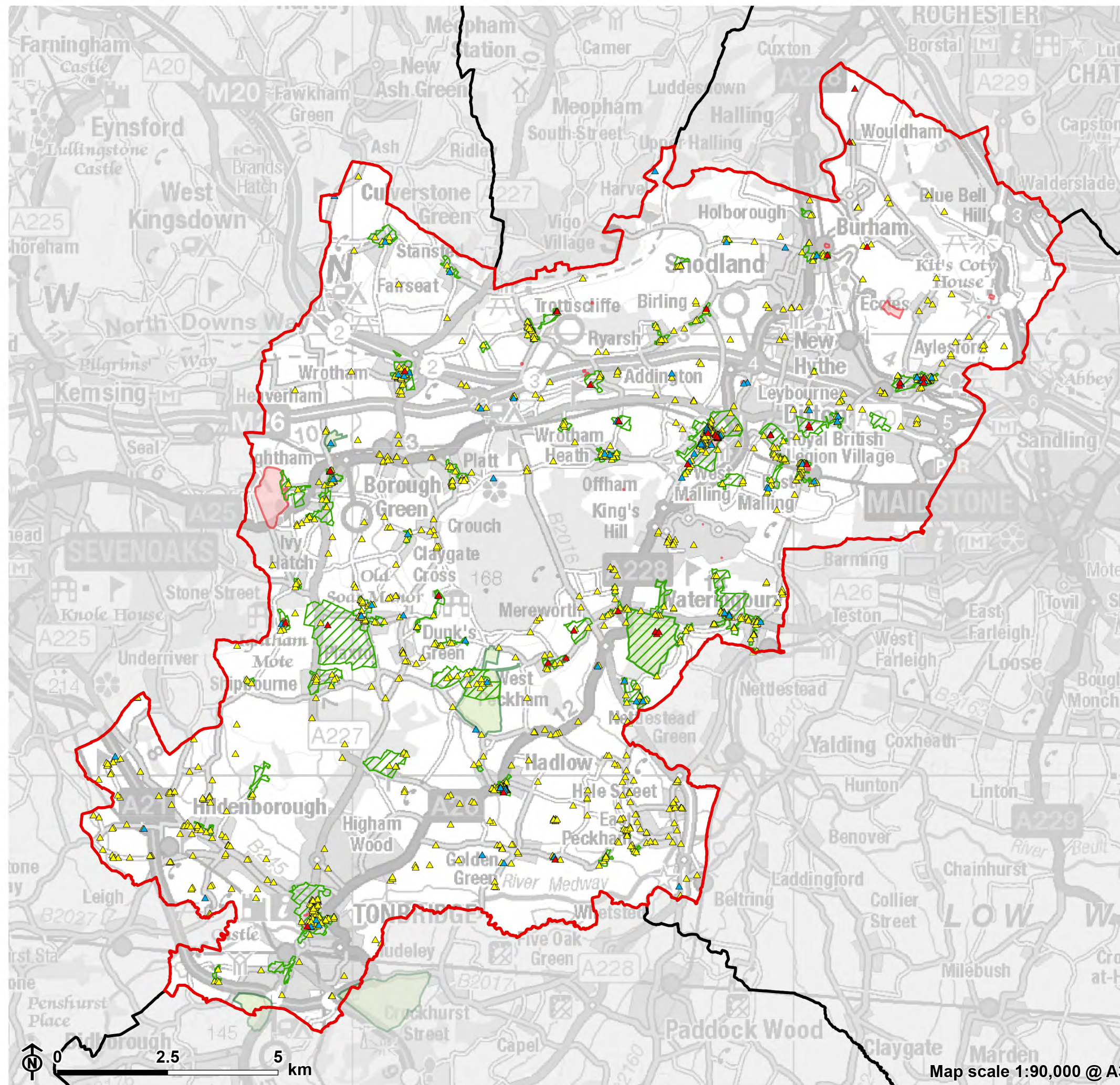
- Tonbridge and Malling boundary
- Neighbouring local authority
- Authorised landfill site
- Historic landfill sites

Figure 3.8: Biodiversity and geodiversity assets



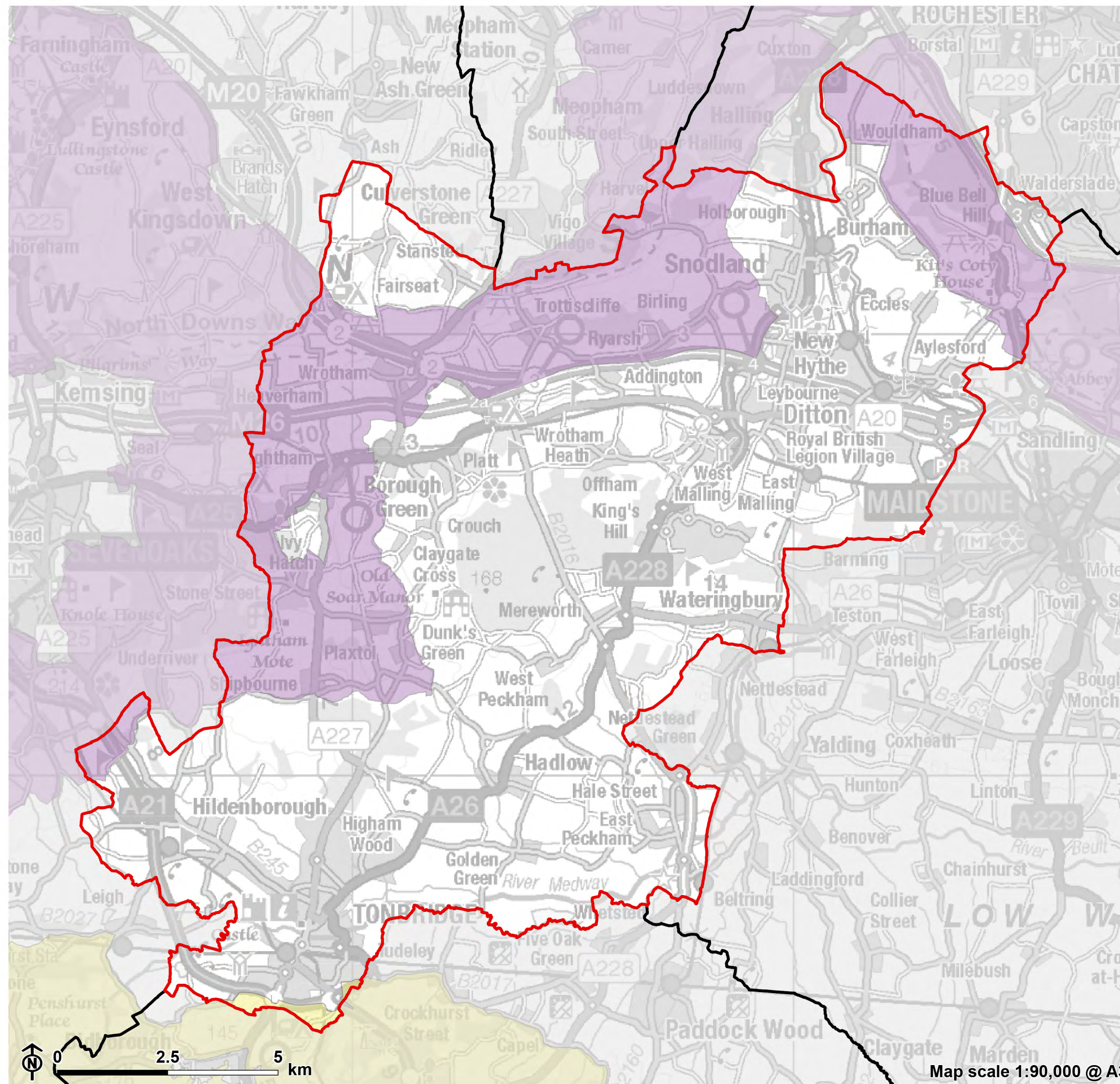
- Tonbridge and Malling boundary
- Neighbouring local authority
- Local Nature Reserve (LNR)
- Local Wildlife Site (LWS)
- Special Area of Conservation (SAC)
- Site of Special Scientific Interest (SSSI)

Figure 3.9: Heritage assets



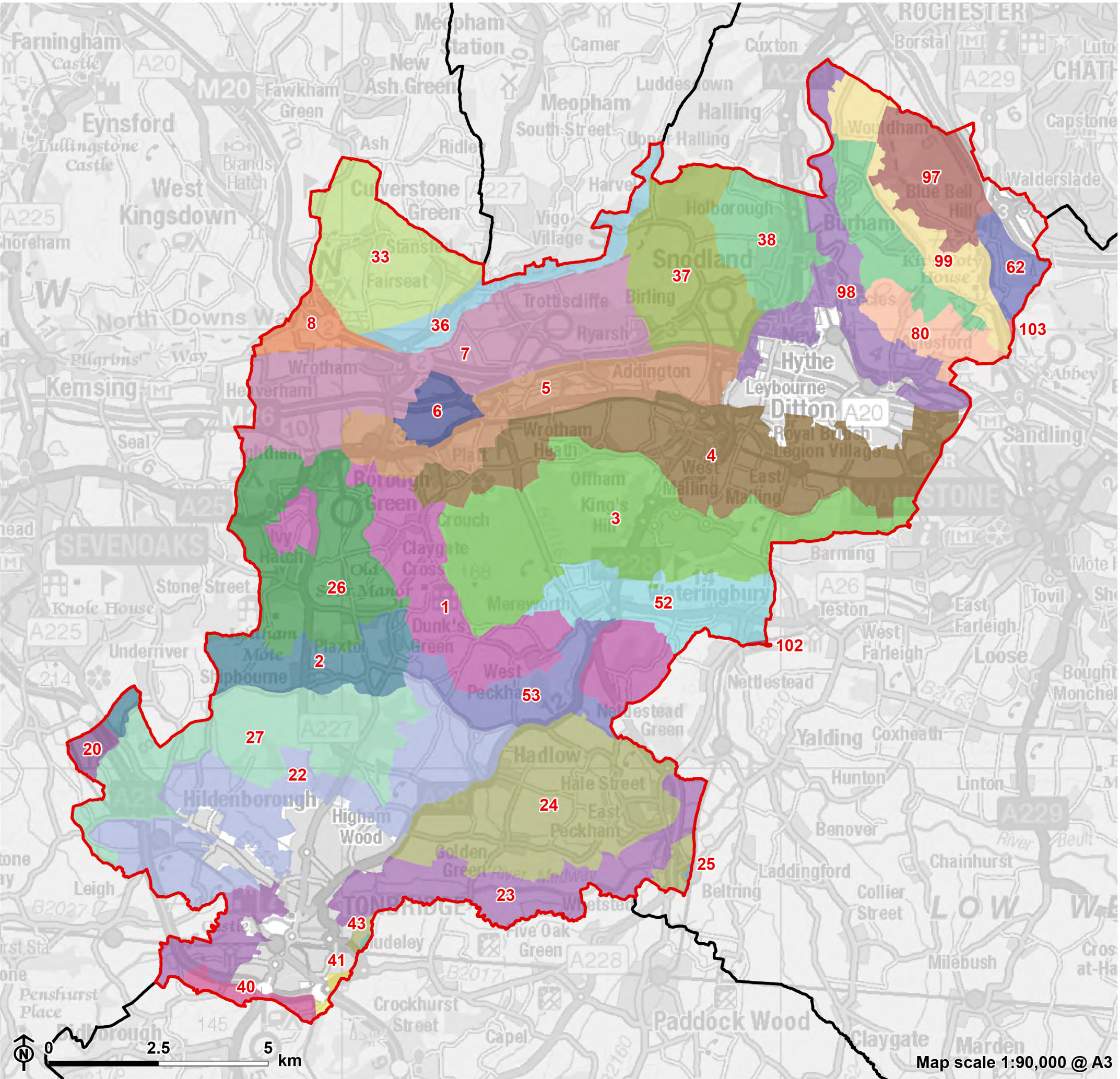
- Tonbridge and Malling boundary
- Neighbouring local authority
- Listed Building**
 - ▲ Grade I
 - ▲ Grade II*
 - ▲ Grade II
- Conservation Area
- Scheduled Monument
- Registered Park and Garden

Figure 3.10: Location of National Landscapes



- Tonbridge and Malling boundary
- Neighbouring local authority
- National Landscape**
 - Kent Downs
 - High Weald

Figure 3.11: Kent Landscape Character Areas in
Tonbridge and Malling Borough

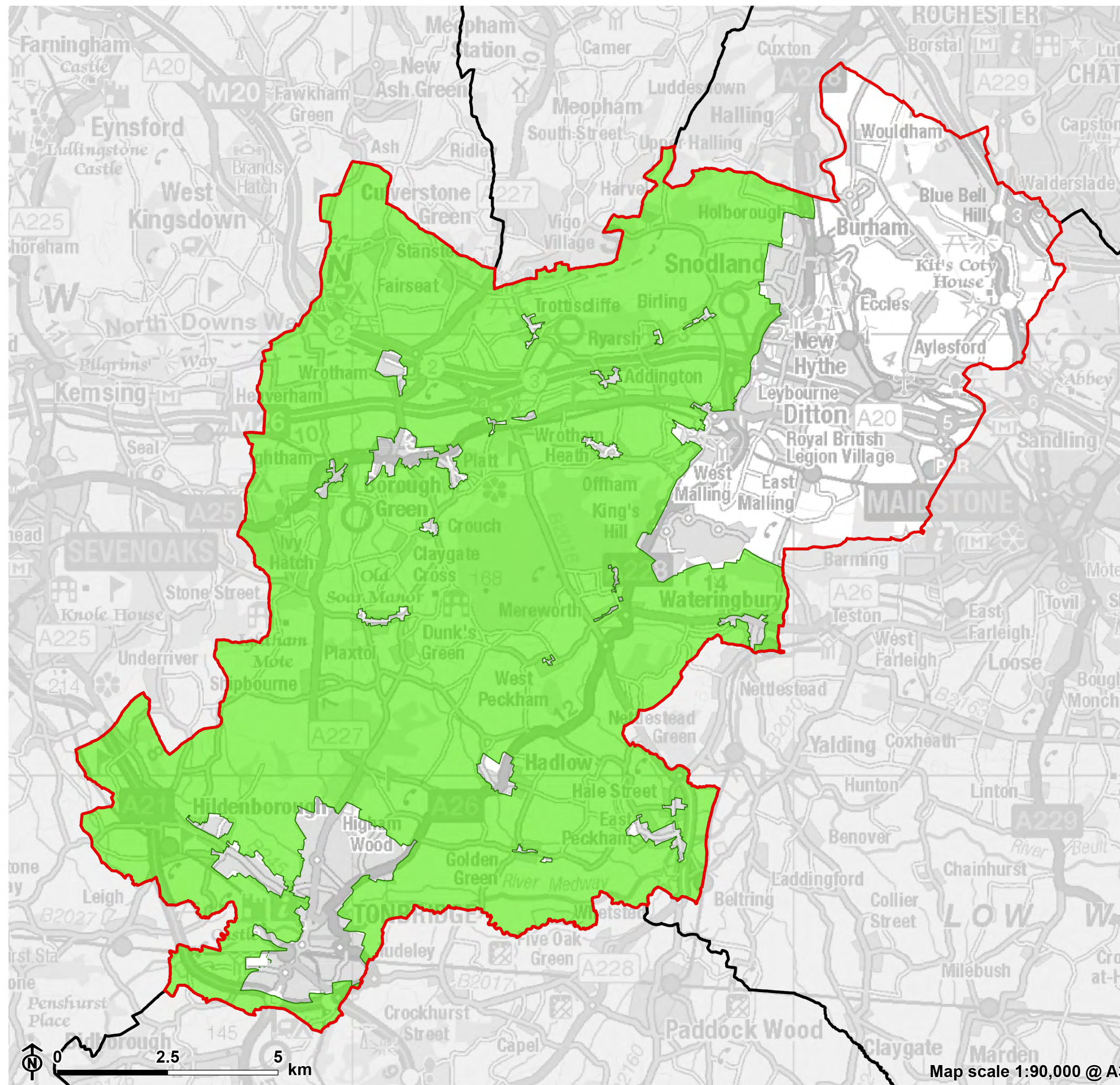


□ Tonbridge and Malling boundary
□ Neighbouring local authority

Landscape Character Area

1. Greensand Ridge - Plaxtol
2. Eastern Low Weald: The Low Weald
3. Mereworth Woodlands
4. Greensand Fruit Belt - Malling
5. Wrotham Heath-Ryarsh Gap
6. Kemsing Vale
7. Kemsing Vale - Kent Downs
8. Kingdown: West Kent Downs
20. Western Low Weald: The Low Weald
22. Hildenborough-Leigh Farmlands
23. Medway Valley
24. Low Weald Fruit Belt
25. Teise Valley
26. Ightham Greensand: Sevenoaks Ridge
27. Western Wooded Farmlands
33. Ash Downs
36. Luddesdown: West Kent Downs
37. The Western Scarp: Medway
38. Kent Downs - Medway, Western & Eastern Scarp
38. Kent Downs - Medway, Western & Eastern Scarp
40. Penshurst: Central High Weald
41. Pembury: Central High Weald
43. Kent Fruit Belt: Kentish High Weald
52. Greensand Fruit Belt - Watlingbury
53. Valeside Farms and Parklands
62. Chatham Outskirts: Mid Kent Downs
80. Hollingbourne Vale West
97. Nashenden Valley: Mid Kent Downs
98. Medway Valley, Medway Valley Lower
99. The Eastern Scarp: Medway
102. Medway Valley - Medway Valley Upper
103. Boxley Vale: Medway

Figure 3.12: Green Belt coverage



- Tonbridge and Malling boundary
- Neighbouring local authority
- Green Belt

Chapter 4

Key sustainability issues and likely evolution without the Local Plan

4.1 Analysis of the baseline information has enabled a number of key sustainability issues facing Tonbridge and Malling Borough to be identified. Identification of the key sustainability issues and consideration of how these issues might develop over time if the new Local Plan is not implemented help to meet the requirements of Annex 1 of the SEA Directive to provide information on “the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan; and any existing environmental problems which are relevant to the plan”.

4.2 Key sustainability issues for Tonbridge and Malling were previously identified through the SA Scoping process in 2022 for the Regulation 18 Local Plan. These issues have been considered as a starting point but have been fully reviewed and updated during the preparation of this SA Scoping Report, in light of the updated policy review and latest baseline information. The current set of key sustainability issues for Tonbridge and Malling is presented overleaf.

4.3 It is also a requirement of the SEA Regulations that consideration be given to the likely evolution of the environment in the plan area (in this case Tonbridge and Malling Borough) if the new Local Plan was not to be implemented. This analysis is also presented overleaf in relation to each of the key sustainability issues.

4.4 The information collated shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting Tonbridge and Malling would be more likely to continue without the implementation of the new Local Plan, although the policies in the adopted Tonbridge and Malling Local Plan would still go some way towards addressing many of the issues. In most cases, the new Local Plan offers opportunities to affect existing trends

directly and strongly in a positive way, through an up-to-date plan which reflects the requirements of the current NPPF.

Climate

Key sustainability issue

4.5 Should climate change predictions be realised, there is the potential for significant adverse effects on the borough's infrastructure, public health, built heritage and natural environment. Species and habitat abundance will become threatened as a result of changing habitats, drier soils and increased competition from invasive and non-native species throughout the borough. There is also increased risk of soil erosion due to drier soils, potentially having adverse impacts on agriculture, aquatic ecosystems and air quality. Increased temperatures and extreme weather events have the potential to impact upon public health during heat waves and flood events. This includes increased risk of outbreaks of disease and potential increased contamination risk.

4.6 Flooding from increased rainfall, more intense storm events and sea level rise may lead to significant adverse impacts on utility, residential, industrial and transport infrastructure with subsequent economic consequences. There is potential for an increase in river flooding and also flooding from surface water runoff, which can overwhelm the local drainage and sewerage infrastructure. Damage to infrastructure may incur economic costs as well as social and public health implications as a result of distress and disruption caused.

4.7 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.

4.8 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.

Likely evolution of the issue without the Local Plan

4.9 The new Local Plan offers the opportunity to update the borough's approach to managing the effects of the changing climate and associated weather events, particularly in the design of new buildings and green infrastructure.

4.10 This could include the use of nature-based solutions for climate adaptation, for example the use of green roofs and other ecosystem-based approaches to increase resilience to climate change. These solutions will help to manage the effects of the changing climate and associated weather events, and also promote biodiversity.

4.11 The new Local Plan offers an opportunity to contribute further to mitigate the potential effects of any flooding and help the borough's communities adapt to the increased likelihood of significant weather events in the future.

4.12 The new Local Plan offers an opportunity to strengthen policies which act positively in terms of climate, especially those that limit the need to travel through the appropriate siting and design of new development or which encourage electric vehicle uptake in place of petrol and diesel fuelled vehicles, and which make provision for renewable energy generation. Without the Local Plan, it is possible that contributions towards climate change would continue to increase, as there would be a different baseline of expected growth, which may increase vehicle numbers. Even if these would be electric vehicles, they would still contribute towards non-exhaust emissions (i.e. particulates from tyres).

Landscape character

Key sustainability issue

4.13 The key sustainability issue affecting landscape character and quality within the borough is the pressure of new development within the National Landscapes and their settings, alongside issues such as poor design quality and inappropriate scales of development, 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, as well as the distinctive character of the National Landscapes and their special characters. Tonbridge and Malling Borough contains two National Landscapes and four National Character Areas, all of which could be significantly harmed by inappropriate development. As well as loss of undeveloped land to development, indirect effects of development can also erode landscape character, such as noise and light pollution, recreational pressure, changes the water environment, and pressure on habitats and biodiversity.

Likely evolution of the issue without the Local Plan

4.14 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. Without the new Local Plan, this issue is less likely to be addressed as it is more likely that piecemeal and ad hoc developments would come forward.

Ecology and biodiversity and geodiversity

Key sustainability issue

4.15 Tonbridge and Malling contains and is in close proximity to a number of both designated and non-designated natural habitats, biodiversity and geodiversity sites. These sites include those designated for their national and international importance, including two SACs and nine RIGS. While these natural habitats are essential for maintaining flora and fauna, the borough faces challenges in relation to air quality. Future population growth, increased development, and traffic congestion could worsen air quality, impacting biodiversity and ecosystem health. Poor air quality can lead to imbalances in ecosystems, and habitat degradation.

Likely evolution of the issue without the Local Plan

4.16 Without the Local Plan, there is a risk of uncoordinated development that could negatively impact these important natural areas, leading to potential loss of biodiversity, harm to geodiversity sites, and diminished environmental quality across the borough. However, it should be noted that without the Local Plan, development also offers the opportunity to support landscape-scale nature recovery. The new Local Plan provides an opportunity to manage development pressures on designated sites, and to evaluate the condition of the habitats and employ measures to ensure that future growth does not adversely affect their current condition but where possible contributes to their enhancement, extension and connection.

Water environment

Key sustainability issue

4.17 While most of Tonbridge and Malling falls within Flood Zone 1, there are several areas of Flood Zones 3, particularly surrounding the River Medway and River Bourne, which are significant water resources within the borough. Many of these existing areas of flood risk may experience an increase in the number of flood events in the future due to climate change increasing rainfall intensity.

4.18 The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fail'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.

Likely evolution of the issue without the Local Plan

4.19 The new Local Plan provides the opportunity to direct development away from areas of highest flood risk, reducing increased pressure on significant water resources. The new Local Plan also offers an opportunity to ensure appropriate mitigation, including SuDS, is required as part of proposed development to help mitigate any potential impacts on water resources.

4.20 The new Local Plan has the potential to secure long term sustainable development, which will be essential in ensuring that all new development implements water efficiency standards.

Land

Key sustainability issue

4.21 Development on brownfield land or land at risk of contamination could cause the release of contaminants into groundwater or surface waters. Contaminants could impact on environmental receptors such as nature conservation sites or watercourses. Most of the agricultural land in Tonbridge and Malling Borough is classified as Grades 2 and 3 agricultural land. Development could potentially affect this good quality agricultural land, reducing the amount of land in the borough available for agriculture.

4.22 Any development on contaminated land should adequately deal with the contamination risk as to prevent harm to human health, property and the environment.

4.23 Continued industrial activities could release contaminants into the environment through pollution incidents such as release of chemicals or dust from quarrying. Often quarries are closely related to RIGS, which are also important geological conservation sites. There is a need for the protection and maintenance of the integrity of RIGS, particularly those that may be affected by nearby development.

Likely evolution of the issue without the Local Plan

4.24 The new Local Plan provides an opportunity to ensure that land is not compromised by future growth by directing development away from contaminated land and that appropriate measures are required to ensure risks of contaminants are minimised. The new Local Plan provides the opportunity to prioritise the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile.

4.25 The new Local Plan provides an opportunity to manage development pressures on designated sites such as RIGS, ensuring their protection.

Historic environment

Key sustainability issue

4.26 Tonbridge and Malling Borough contains a wealth of heritage assets, four of which are identified as 'at risk' due to being in poor or unsatisfactory condition, or having extensive significant problems. There is a risk that adverse impacts could arise from development in the future. Any development that has the potential to affect these assets should not detract from their historic setting and should aim to enhance the historic character of the area.

Likely evolution of the issue without the Local Plan

4.27 Without the Local Plan, it is possible that heritage assets would be adversely affected by inappropriate development. This is because the Local Plan will be developed on the basis of a different baseline of expected growth, which may put these assets (including their settings) under increased pressure. The Local Plan offers an opportunity to limit development in more historically sensitive areas and to ensure that development does not result in adverse effects, whilst also providing an opportunity to conserve and enhance the historic environment as well as improve the accessibility and interpretation of it.

Air quality

Key sustainability issue

4.28 Tonbridge and Malling contains five AQMAs. Main air quality issues are linked to emissions from road traffic, which highlights the significant impact of vehicular activity on local air pollution levels. Greater pressures on air quality may occur in the future through increases in the population of the borough, greater development and increased traffic congestion. This could lead to a deterioration in air quality, with implications on human health such as increases in cardiovascular and respiratory diseases, and implications on the health and biodiversity of flora and fauna. A deterioration in air quality could also lead to the declaration of more AQMAs to address these local impacts on air quality.

Likely evolution of the issue without the Local Plan

4.29 The new Local Plan provides an opportunity to plan development and supporting infrastructure sustainably to minimise deterioration in air quality without inhibiting the need for growth.

Population and human health

Key sustainability issue

4.30 A growing population will create a substantial need for further housing (including affordable housing), education facilities, and improved social, leisure and transportation infrastructure. This growing population will place increased

Chapter 4 Key sustainability issues and likely evolution without the Local Plan

demand on a range of community services and facilities, and also increase competition for jobs. Pressure also arises from a higher population density.

4.31 There are some areas of deprivation across the borough, creating disparity. There are also a number of health issues that affect the community which increases vulnerability of the population and places further demands on community services and facilities.

Likely evolution of the issue without the Local Plan

4.32 Without the new Local Plan, the required housing, facilities and infrastructure is less likely to be delivered and/or be delivered in less sustainable locations.

4.33 The new Local Plan offers an opportunity to reduce the gap between the most and least deprived by providing for, or encouraging access to, healthcare facilities, well designed and located development and opportunities to exercise, all of which will support health and wellbeing.

Key sustainability issue

4.34 There is a need for affordable housing in Tonbridge and Malling, because at present, the mean price of dwellings is much higher than the national average. Additionally, there has been persistent under-delivery of housing within the borough, placing great pressure on the Council's five-year housing land supply position.

Likely evolution of the issue without the Local Plan

4.35 A growing population will create a substantial need for further housing, including affordable housing. Without the new Local Plan, the required housing (including affordable housing) is less likely to be delivered – exacerbating the persistent under delivery of housing within the borough. It will also place even greater pressure on the Council’s five-year housing land supply. The new Local Plan offers an opportunity to address this issue by identifying suitable land for housing development, including affordable housing, ensuring that the needs of the community are met and that the borough can accommodate its growing population in a sustainable way.

Key sustainability issue

4.36 Tonbridge and Malling has a slightly older population than the national average, with the key demographic group within the 50 – 59 age range. There will be a significant increase in the ageing population within Tonbridge and Malling Borough between 2024 and 2042, which could result in increased pressures on certain services and facilities such as GP surgeries and hospitals, as well as housing and transport infrastructure.

Likely evolution of the issue without the Local Plan

4.37 The new Local Plan offers an opportunity to improve access to and increase availability of such services and facilities. Without the new Local Plan, there is likely to be an increasing strain on services and facilities which do not meet local demand.

Key sustainability issue

4.38 Tonbridge and Malling has a range of amenity and natural green spaces, but provision has not kept pace with population growth, leading to a 0.92% decrease per 1,000 residents since 2011. Additionally, play areas for children and young people fall below national benchmarks, highlighting a shortfall in recreational facilities.

Likely evolution of the issue without the Local Plan

4.39 Without the Local Plan, the decline in provision is likely to continue, increasing pressure on existing green spaces and limiting opportunities for outdoor recreation, particularly for young people and young people. The new Local Plan therefore offers the opportunity to address these gaps by protecting and enhancing green spaces, ensuring that new developments contribute to accessible outdoor areas, and improving play facilities to meet national standards.

Economy and employment

Key sustainability issue

4.40 Although employment levels within the borough are higher than the national average, weekly pay for full time workers in the borough is greater than the South East region and Great Britain as a whole. Residents commute out of the borough to attain highly skilled employment, whilst others commute in to fulfil lower skilled jobs.

4.41 The movement of workers between Tonbridge and Malling Borough and the adjacent districts and boroughs also places pressure on the borough's transport network, increasing congestion.

Likely evolution of the issue without the Local Plan

4.42 The new Local Plan can help support a strong economy, growth, and new businesses, by identifying the employment sites and infrastructure required.

Key sustainability issues

4.43 Educational attainment in Tonbridge and Malling is slightly lower than regional and national averages, particularly in relation to Level 4 and above qualifications.

Likely evolution of the issue without the Local Plan

4.44 Without the Local Plan, there is a risk that skills gaps could widen, limiting economic opportunities and social mobility within the borough. The new Local Plan presents an opportunity to support skills development and lifelong learning by encouraging investment in local education and training facilities.

Material assets

Key sustainability issue

4.45 The borough has good internal and external transport links. The predicted increase in population will place greater pressure on the transport network, which could be exacerbated by an increase in future development pressures, particularly around areas of current high traffic volume.

4.46 The borough has good PRow networks which help facilitate access to the countryside and open space. However, the predicted increase in population will require the provision of open space to increase accordingly.

4.47 The Local Plan offers an opportunity to support and improve public transport networks and integrate the provision of open space with new developments.

Likely evolution of the issue without the Local Plan

4.48 The new Local Plan could help reduce greater pressure on the transport network by supporting the use of sustainable modes of travel by ensuring development is supported by sustainable infrastructure and that amenities, services and jobs are located within a reasonable walking and cycling distance.

4.49 The new Local Plan provides opportunities for open space and recreation provision, increasing the number of opportunities available to promote healthy lifestyles, social cohesion and benefits for mental health.

Waste and minerals

Key sustainability issue

4.50 Recycling rates have increased across the borough and will need to continue to increase in alignment with Kent County Council goals. Future population increase is likely to place increasing pressure on waste management systems and facilities.

Likely evolution of the issue without the Local Plan

4.51 The new Local Plan provides the opportunity to support the waste hierarchy including sustainable and well-designed development, requiring sustainable demolition and construction practices and the provision of space and infrastructure to support recycling.

Chapter 5

Sustainability Appraisal framework

5.1 The approach being taken to the SA of the Tonbridge and Malling Local Plan is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG).

5.2 The development of a set of SA objectives (known as the SA framework) is a recognised way in which the likely environmental and sustainability effects of a plan can be described, analysed and compared.

5.3 The proposed SA framework for the Tonbridge and Malling Local Plan is presented below. The SA framework that was used for the Interim Sustainability Appraisal for the 2022 Regulation 18 Local Plan has been subject to some minor amendments in light of updated baseline information, key sustainability issues and a review of international, national and local policy objectives, but remains largely the same.

5.4 The SA framework comprises a series of SA objectives against which the sustainability of the Local Plan will be appraised. The appraisal of the Local Plan options, policies and site allocations against these SA objectives will be guided in part by the appraisal questions (i.e. the sub-objectives) accompanying each overall objective. The questions included in the framework are not exhaustive, and some may be more relevant to certain elements of the Local Plan than others. Minor amendments were made to a small number of the sub-objectives in response to comments received from statutory consultees during the Scoping consultation (see Appendix B), with some new sub-objectives added.

5.5 All of the topics specifically required by the SEA Regulations (set out in Schedule 2 of the SEA Regulations) are clearly addressed by the headline SA objectives, as listed under each SA objective below.

5.6 At the end of this chapter, the SA framework is presented in table format.

SA objective 1: To improve human health and well-being

Sub-objectives

- To reduce health inequalities amongst different groups in the community.
- To improve access to health and social care services.
- To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, leisure facilities, children's and teenage play areas and access to green spaces.
- To maintain low crime levels.
- To reduce the fear of crime.
- To reduce levels of anti-social behaviour.
- To encourage safety by design.
- To promote healthy lifestyles through connecting people with nature and promoting high standards of green infrastructure.
- To encourage local food growing and healthy eating including allotments and community gardens.
- To accommodate the needs of an ageing population.

Relevant SEA topics

- Population
- Human health

SA objective 2: To improve equality and access to community facilities and services

Sub-objectives

- To improve access to leisure facilities.
- To maintain and improve access to essential services and facilities.
- To promote the use of more sustainable modes of transport.
- To encourage walking, cycling and the use of public transport.
- To provide, protect and enhance active travel routes, including Public Rights of Way networks.

Relevant SEA topics

- Population
- Human health
- Material assets

SA objective 3: To ensure access to educational facilities and support skills and training development for all age groups and all sectors of society

Sub-objectives

- To maintain and increase levels of participation in education for all members of local communities.
- To improve the provision of education and training facilities.
- To improve access to and involvement in higher education.
- To improve qualifications and skills of young people and adults.

Relevant SEA topics

- Population

SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic inclusion across the borough

Sub-objectives

- To support businesses to grow, expand and diversify, particularly in rural areas.
- To increase local employment opportunities for all and the provision of higher value jobs, reducing levels of unemployment.
- To support business performance, growth and resilience.
- To protect existing and provide new employment floorspace.
- To ensure that supporting infrastructure is provided to encourage economic growth.
- To support the needs of small and medium business enterprises.
- To support the vitality and viability of town centres.

Relevant SEA topics

- Population

SA objective 5: To protect and enhance biodiversity and geodiversity

Sub-objectives

- To protect and enhance designated sites of nature conservation importance and designated sites for geodiversity.
- To protect and enhance habitats and wildlife corridors, including on brownfield land.
- To provide opportunities for people to access wildlife and open green spaces.
- To increase biodiversity net gain.
- To protect, conserve and enhance protected species, including priority species, and habitats – including those of conservation importance that contribute to reversing the trend of ecological decline.
- To protect, enhance and expand ecological networks and their interconnectivity.
- To protect irreplaceable habitats.
- To ensure that development follows the biodiversity mitigation hierarchy of avoid, minimise, remediate, compensate.
- To protect and enhance green and blue infrastructure.
- To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy.

Relevant SEA topics

- Biodiversity
- Flora and fauna

SA objective 6: To protect and enhance the borough's landscape and townscape character and quality

Sub-objectives

- To protect and enhance landscape character and quality, particularly landscapes of high quality and value.
- To protect and enhance townscape character and quality.
- To protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.
- To conserve and enhance National Landscapes within the borough and their settings.
- To promote high quality design in the context of the landscape and townscape, enhancing local distinctiveness.
- To protect and enhance settlement identities including their setting and character.

Relevant SEA topics

- Landscape
- Cultural heritage

SA objective 7: To protect, conserve and enhance heritage and cultural assets

Sub-objectives

- To protect, conserve and enhance heritage assets and their settings, including sites and features of archaeological value.
- To protect and enhance the historic character of the landscape/townscape.

Relevant SEA topics

- Cultural heritage

SA objective 8: To protect and enhance the water environment and reduce flood risk

Sub-objectives

- To protect water resources such as those used for the supply of water and abstraction.
- To reduce the risk of flooding to existing communities and ensure no new developments are at risk.
- To improve water quality including contributing towards achievement of relevant River Basin Management Plan aims.

- To minimise water consumption, such as through high standards of water efficiency.
- To ensure infrastructure is adequate to support water supply and sewer connections.
- To ensure that wastewater treatment infrastructure is available.

Relevant SEA topics

- Water
- Population

SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination

Sub-objectives

- To reduce the amount of derelict, underused and vacant land.
- To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible.
- To protect valued soils, soil functions and protect and enhance soil quality and prevent soil pollution.
- To avoid development of 'best and most versatile' agricultural land.
- To prevent the sterilisation of mineral deposits.
- To prevent land contamination and promote the remediation of contaminated land.

Relevant SEA topics

- Soil
- Material assets

SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency and contribute to becoming a net zero carbon borough

Sub-objectives

- To reduce and minimise greenhouse gas emissions.
- To contribute towards becoming a carbon neutral Council and borough by 2030.
- To increase energy efficiency.
- To support the transition from fossil fuels and promote the use of decentralised and low carbon energy.
- To promote the use of sustainable modes of transport such as walking, wheeling and the use of public transport.
- To reduce use of the private car.
- To encourage the production of energy from waste.
- To promote sustainable methods of design and construction including reducing embodied carbon emissions.
- To support the provision of and uptake of electric charging infrastructure.
- To nurture development of a green economy.

- To support businesses in becoming net zero.
- To promote compact, mixed-use development in sustainable locations, encouraging walking and cycling for short journeys.

Relevant SEA topics

- Climate
- Human health
- Material assets

SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation

Sub-objectives

- To contribute to climate change adaptation.
- To ensure that developments are designed and constructed to assist in climate change adaptation i.e. reduce overheating, urban cooling, etc.
- To encourage best practice measures for managing flood risk such as SuDS or other flood alleviation measures.
- To reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change.
- To avoid development in areas at risk of flooding or in adjacent areas that would increase flood risk.

- To ensure that nature-based solutions are maximised such as green walls, tree-planting, natural flood management solutions, etc.
- To ensure that there is suitable energy infrastructure capacity.

Relevant SEA topics

- Climate
- Water
- Biodiversity
- Flora and fauna

SA objective 12: To reduce levels of and exposure to noise, light and air pollution

Sub-objectives

- To protect and improve local air quality.
- To minimise increases in traffic and congestion.
- To minimise development in areas exposed to poor air quality (e.g. AQMAs).
- To minimise noise generation in close proximity of sensitive receptors.
- To minimise light pollution.

Relevant SEA topics

- Air
- Climate

- Biodiversity
- Flora and fauna
- Landscape

SA objective 13: To protect material assets and minimise waste

Sub-objectives

- To ensure sustainable use of natural resources.
- To reduce the demand for raw materials.
- To promote the re-use of aggregates and the use of sustainable/local materials in construction.
- To increase the proportion of waste recycling and reuse.
- To reduce the production of waste.
- To reduce the proportion of waste generated and waste that goes to landfill.

Relevant SEA topics

- Material assets

SA objective 14: To provide a suitable supply of high quality housing including an approximate mix of sizes, types and tenures to meet local needs

Sub-objectives

- To contribute to housing supply.
- To contribute to meeting local housing needs (affordable, specialist housing) to meet the needs of all.
- To provide an appropriate mix of sizes, types and tenures of housing.
- To promote housing that is of high quality.
- To reduce or prevent homelessness.
- To provide pitches for Gypsies and Travellers.

Relevant SEA topics

- Population

Table 5.1: Sustainability Appraisal framework in table format

SA objective	Sub-objectives	SEA topics
SA objective 1: To improve human health and well-being	To reduce health inequalities amongst different groups in the community.	Population Human health
	To improve access to health and social care services.	
	To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, leisure facilities, children's and teenage play areas and access to green spaces.	
	To maintain low crime levels.	
	To reduce the fear of crime.	
	To reduce levels of anti-social behaviour.	
	To encourage safety by design.	
	To promote healthy lifestyles through connecting people with nature and promoting high standards of green infrastructure.	
	To encourage local food growing and healthy eating including allotments and community gardens.	
	To accommodate the needs of an ageing population.	

SA objective	Sub-objectives	SEA topics
SA objective 2: To improve equality and access to community facilities and services	To improve access to leisure facilities.	Population Human health Material assets
	To maintain and improve access to essential services and facilities.	
	To promote the use of more sustainable modes of transport.	
	To encourage walking, cycling and the use of public transport.	
	To provide, protect and enhance active travel routes, including Public Rights of Way networks.	
SA objective 3: To ensure access to educational facilities and support skills and training development for all age groups and all sectors of society	To maintain and increase levels of participation in education for all members of local communities	Population
	To improve the provision of education and training facilities.	
	To improve access to and involvement in higher education	
	To improve qualifications and skills of young people and adults	
SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic inclusion across the borough	To support businesses to grow, expand and diversify, particularly in rural areas	Population
	To increase local employment opportunities for all and the provision of higher value jobs, reducing levels of unemployment.	
	To support business performance, growth and resilience.	
	To protect existing and provide new employment floorspace.	
	To ensure that supporting infrastructure is provided to encourage economic growth.	

SA objective	Sub-objectives	SEA topics
	To support the needs of small and medium business enterprises.	
	To support the vitality and viability of town centres	
SA objective 5: To protect and enhance biodiversity and geodiversity	To protect and enhance designated sites of nature conservation importance and designated sites for geodiversity.	Biodiversity Flora and fauna
	To protect and enhance habitats and wildlife corridors, including on brownfield land.	
	To provide opportunities for people to access wildlife and open green spaces.	
	To increase biodiversity net gain.	
	To protect, conserve and enhance protected species, including priority species, and habitats – including those of conservation importance that contribute to reversing the trend of ecological decline.	
	To protect, enhance and expand ecological networks and their interconnectivity.	
	To protect irreplaceable habitats.	
	To ensure that development follows the biodiversity mitigation hierarchy of avoid, minimise, remediate, compensate.	
	To protect and enhance green and blue infrastructure.	
	To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy.	
SA objective 6: To protect and enhance	To protect and enhance landscape character and quality, particularly landscapes of high quality and value.	Landscape

SA objective	Sub-objectives	SEA topics
the borough's landscape and townscape character and quality	To protect and enhance townscape character and quality.	Cultural heritage
	To protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.	
	To conserve and enhance National Landscapes within the borough and their settings.	
	To promote high quality design in the context of the landscape and townscape, enhancing local distinctiveness.	
	To protect and enhance settlement identities including their setting and character.	
SA objective 7: To protect, conserve and enhance heritage and cultural assets	To protect, conserve and enhance heritage assets and their settings, including sites and features of archaeological value.	Cultural heritage
	To protect and enhance the historic character of the landscape/townscape.	
SA objective 8: To protect and enhance the water environment and reduce flood risk	To protect water resources such as those used for the supply of water and abstraction.	Water Population
	To reduce the risk of flooding to existing communities and ensure no new developments are at risk.	
	To improve water quality including contributing towards achievement of relevant River Basin Management Plan aims.	
	To minimise water consumption, such as through high standards of water efficiency.	
	To ensure infrastructure is adequate to support water supply and sewer connections.	
	To ensure that wastewater treatment infrastructure is available.	

SA objective	Sub-objectives	SEA topics
SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination	To reduce the amount of derelict, underused and vacant land.	Soil Material assets
	To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible.	
	To protect valued soils, soil functions and protect and enhance soil quality and prevent soil pollution.	
	To avoid development of 'best and most versatile' agricultural land.	
	To prevent the sterilisation of mineral deposits.	
	To prevent land contamination and promote the remediation of contaminated land.	
SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency and contribute to becoming a net zero carbon borough	To reduce and minimise greenhouse gas emissions.	Climate Human health Material assets
	To contribute towards becoming a carbon neutral Council and borough by 2030.	
	To increase energy efficiency.	
	To support the transition from fossil fuels and promote the use of decentralised and low carbon energy.	
	To promote the use of sustainable modes of transport such as walking, wheeling and the use of public transport.	
	To reduce use of the private car.	
	To encourage the production of energy from waste.	

SA objective	Sub-objectives	SEA topics
	To promote sustainable methods of design and construction including reducing embodied carbon emissions. To support the provision of and uptake of electric charging infrastructure. To nurture development of a green economy. To support businesses in becoming net zero. To promote compact, mixed-use development in sustainable locations, encouraging walking and cycling for short journeys.	
SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation	To contribute to climate change adaptation. To ensure that developments are designed and constructed to assist in climate change adaptation i.e. reduce overheating, urban cooling, etc. To encourage best practice measures for managing flood risk such as SuDS or other flood alleviation measures. To reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change. To avoid development in areas at risk of flooding or in adjacent areas that would increase flood risk. To ensure that nature-based solutions are maximised such as green walls, tree-planting, natural flood management solutions, etc. To ensure that there is suitable energy infrastructure capacity.	Climate Water Biodiversity Flora and fauna

SA objective	Sub-objectives	SEA topics
SA objective 12: To reduce levels of and exposure to noise, light and air pollution	To protect and improve local air quality.	Air Climate Biodiversity Flora and fauna Landscape
	To minimise increases in traffic and congestion.	
	To minimise development in areas exposed to poor air quality (e.g. AQMAs).	
	To minimise noise generation in close proximity of sensitive receptors.	
	To minimise light pollution.	
SA objective 13: To protect material assets and minimise waste	To ensure sustainable use of natural resources.	Material assets
	To reduce the demand for raw materials.	
	To promote the re-use of aggregates and the use of sustainable/local materials in construction.	
	To increase the proportion of waste recycling and reuse.	
	To reduce the production of waste.	
	To reduce the proportion of waste generated and waste that goes to landfill.	
SA objective 14: To provide a suitable supply of high quality housing including an approximate mix of sizes, types and	To contribute to housing supply.	Population
	To contribute to meeting local housing needs (affordable, specialist housing) to meet the needs of all.	
	To provide an appropriate mix of sizes, types and tenures of housing.	
	To promote housing that is of high quality.	

SA objective	Sub-objectives	SEA topics
tenures to meet local needs	To reduce or prevent homelessness.	
	To provide pitches for Gypsies and Travellers.	

Use of the SA framework

5.7 The SA will be undertaken in close collaboration with the Tonbridge and Malling Borough Council officers responsible for drafting the new Local Plan in order to fully integrate the SA process with the production of the plan.

5.8 Strategic policies and site allocations, including the reasonable alternative options, will be appraised against the SA objectives in the SA framework, with symbols being attributed to each policy or site option to indicate their likely effects on each SA objective. Where a potential positive or negative effect is uncertain, a question mark will be added to the relevant symbol (e.g. +? or -?) and the symbol will be colour coded in line with the potential positive, negligible or negative effect (e.g. green, white, purple, etc.).

5.9 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal will attempt to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in Table 5.2. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) will be used to distinguish significant effects from more minor effects (+ or -) this will be because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Table 5.2: Key to symbols and colour coding used in the SA of the Tonbridge and Malling Local Plan

Symbol and colour code	Description
++	Significant positive effect likely

Symbol and colour code	Description
++/0	Mixed significant positive and negligible effects likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/0	Mixed minor positive and negligible effects likely
+/-	Mixed minor effects likely
++/--	Mixed significant effects likely
-	Minor negative effect likely
-/0	Mixed minor negative and negligible effects likely
--/+	Mixed significant negative and minor positive effects likely
	Significant negative effect likely
/0	Mixed significant negative and negligible effects likely
0	Negligible effect likely
?	Likely effect uncertain

5.10 In relation to the appraisal of the site options, detailed sets of site assessment criteria have been developed (Chapter 6) and will be applied during the next stage of the SA. The criteria relate specifically to each type of site option (i.e. residential, employment, mixed use etc.). The site assessment criteria set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The criteria, where required, may be updated at future stages on the SA to draw on the most recent evidence sources. The site assessment criteria can be applied through the use of Geographical Information Systems (GIS) where appropriate.

5.11 In determining the significance of the effects of the options for potential inclusion in the new Local Plan it will be important to bear in mind the relationship of the Local Plan with the other documents in the planning system such as the NPPF and other national policy approaches, and regulatory requirements, as these may provide additional safeguards or mitigation of potentially significant adverse effects.

Reasonable alternatives

5.12 The SA must appraise not only the preferred options for inclusion in the Local Plan but also 'reasonable alternatives' to these options. This implies that alternatives that are not reasonable do not need to be subject to appraisal. Part (b) of regulation 12(2) of the SEA Regulations notes that reasonable alternatives will take into account the objectives of the plan, as well as its geographical scope. Therefore, alternatives that do not meet the objectives of national policy, local objectives or are outside the plan area are unlikely to be reasonable.

5.13 Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

5.14 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account. Future iterations of the SA will describe how the appraisal of options has been taken into consideration when developing the draft Tonbridge and Malling Local Plan.

Chapter 6

Site assessment criteria

6.1 Reasonable alternative site options for the residential, employment and mixed use sites to be allocated in the Local Plan will be identified by TMBC. These sites will be appraised against the site assessment criteria set out in this chapter. Some changes were made to the site assessment criteria in response to comments received from statutory consultees during the Scoping consultation (see Appendix B).

6.2 The GIS-based approach to site appraisals means that where a site is found to have a negative effect, this may be as a result of only a small part of that site falling within the relevant constraint being considered.

6.3 This approach, which will be carried forward into the forthcoming SA of site options, will ensure that the SA still highlights potential adverse effects and flags these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation.

6.4 At the end of this chapter, the site assessment criteria is presented in table format.

Assumptions regarding distances

6.5 A number of the appraisal assumptions presented in this document 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 Chartered Institution of Highways and Transportation found that the average length of a walk journey is one kilometre. The Chartered Institution of Highways and Transportation categorises distances

depending upon location and purpose of the trip as 'desirable', 'acceptable' and 'preferred maximum':

- Town centres:
 - Desirable – 200m
 - Acceptable – 400m
 - Preferred maximum – 800m
- Commuting/school/sightseeing:
 - Desirable – 500m
 - Acceptable – 1,000m
 - Preferred maximum – 2,000m
- Elsewhere:
 - Desirable – 400m
 - Acceptable – 800m
 - Preferred maximum – 1,200m

6.6 It is important to note that some of the issues addressed by the SA objectives are cross cutting and could be relevant to more than one of the SA objectives and associated assessment criteria listed below. Therefore, to avoid repetition they are only addressed under the most relevant SA objective. Furthermore, not all of the sub-objectives listed in the SA framework are measurable, and therefore assumptions have only been included where effects can be measured and appraised spatially, as set out below.

SA objective 1: To improve human health and well-being

Residential and mixed use site options

6.7 Residential sites and mixed use sites incorporating residential development that are within close proximity of existing healthcare facilities (e.g. GP surgeries) will ensure that residents have good access to healthcare services. 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.

6.8 Public health will also be influenced by the proximity of residential and mixed use sites to open spaces, walking and cycle paths, play areas, recreation and sports facilities, easy access to which can encourage participation in active outdoor recreation. Employees working within mixed-use sites may also be more able to commute via active modes and make use of open spaces during breaks. As with healthcare facilities, new development could potentially stimulate the provision of new spaces and facilities for active recreation; however this cannot be assumed at this stage. Therefore:

- Sites that are within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility will have a significant positive (++) effect;
- Sites that are within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both) will have a minor positive (+) effect; and
- Sites that are not within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility will have a minor negative (-) effect.

6.9 If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++) or (+/-?) effect.

Employment site options

6.10 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. Therefore:

- Sites that are within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor positive (+) effect; and
- Sites that are not within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor negative (-) effect.

6.11 The effects of all new development (residential, employment and mixed-use) on safety, including levels of crime and fear of crime, will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the policies in the new Local Plan and detailed proposals for each site).

6.12 If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility, it is recognised that that this use may be lost as a result of development. As such where site options contain such

features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (+/--?) effect.

SA objective 2: To improve equality and access to community facilities and services

Residential and mixed use site options

6.13 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. Tonbridge including Hilden Park is the main town within the borough and is the main focus of services and facilities but other settlements also offer a range of services and facilities at varying levels.

- Sites within a Tier 1-4 settlement will have a significant positive (++) effect;
- Sites adjacent to a Tier 1-4 settlement will have a minor positive (+) effect;
- Sites that are within or adjacent to a Tier 5-6 settlement will have a negligible (0) effect; and
- Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.

Employment site options

6.14 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. Therefore:

- Sites within a Tier 1-4 settlement will have a significant positive (++) effect;
- Sites adjacent to a Tier 1-4 settlement will have a minor positive (+) effect;
- Sites within or adjacent to a Tier 5-6 settlement will have a negligible (0) effect; and
- Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.

SA objective 3: To ensure access to education facilities and support skills and training development for all age groups and all sectors of society

Residential and mixed use site options

6.15 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.

- Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school will have an uncertain significant positive (++?) effect;
- Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school (but not both) will have an uncertain minor positive (+?) effect; and

- Sites that are more than 800m of an existing primary school and more than 1,000m of an existing secondary school will have an uncertain minor negative (-?) effect.

Employment site options

6.16 The location of employment sites is not considered likely to affect this objective.

SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic inclusion across the borough

Residential site options

6.17 The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore a negligible (0) effect is expected for these site options. However, if a site contains an existing business that could be lost as a result of residential development, a minor negative (-) effect is expected. It is acknowledged that some sites may contain existing businesses that have not been identified within the Call for Sites form.

Mixed use and employment site options

6.18 All of the 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 will provide opportunities for the creation of more new jobs and so would have significant positive effects. It is assumed that all mixed use site options will incorporate some element of employment generating uses and could therefore effect the employment opportunities element of this objective. Employment generated from site options is likely to benefit the highest number of residents where sites are accessible by sustainable transport links. Therefore:

- Sites that include employment development more than 5ha in size will have a significant positive (++) effect; and
- Sites that include employment development smaller than 5ha in size will have a minor positive (+) effect.

6.19 In addition, which could lead to mixed effects overall:

- Sites that are within 800m of a train station are likely to have a significant positive (++) effect;
- Sites that are within 400m of a bus stop and/or cycle path (but that are more than 800m from a train station) are likely to have a minor positive (+) effect; and
- Sites that are not within 800m of a train station or within 400m of a bus stop or cycle path are likely to have a negligible (0) effect.

SA objective 5: To protect and enhance biodiversity and geodiversity

Residential, mixed use and employment site options

6.20 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.

- Sites that are within 250m of one or more internationally or nationally designated [\[See reference 144\]](#) biodiversity or geodiversity sites, or that contain a locally designated site, Ancient Woodland or Priority Habitat, may have a 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 (but do not contain) a locally designated [\[See reference 145\]](#) site, Ancient Woodland or Priority Habitat, may have a minor negative (-?) effect; and
- Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a

locally designated site, Ancient Woodland or Priority Habitat, could have a negligible (0?) effect.

SA objective 6: To protect and enhance the borough's landscape and townscape character and quality

Residential, mixed use and employment site options

6.21 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 townscape 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.

- Sites that are located within a settlement will have a negligible (0) effect;
- Sites located entirely or mainly on the edge of a settlement will have an uncertain minor negative (-?) effect; and
- All sites located entirely or mainly outside of settlements in rural locations, and/or would result in the loss of designated open spaces will have an uncertain significant negative (--?) effect.

6.22 In addition, proximity to the Kent Downs and High Weald National Landscape can provide an indication of the potential for development to have adverse impacts on those designated landscapes.

6.23 Sites that are within 1km of the National Landscape, including within the National Landscape, could have a significant negative (--?) effect.

SA objective 7: To protect, conserve and enhance heritage and cultural assets

Residential, mixed use and employment site options

6.24 Development sites that are within close proximity of a heritage asset have the potential to affect their setting and contribution to the local character and distinctiveness. Heritage assets comprise conservation areas, listed buildings, scheduled monuments and registered parks and gardens. 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.

- Sites that are located within 250m of a heritage asset may have a significant negative (--?) effect.
- Sites that are located between 250m-1km of a heritage asset may have a minor negative (-?) effect.
- Sites that are more than 1km from a heritage asset may have a negligible (0?) effect.

SA objective 8: To protect and enhance the water environment and reduce flood risk

Residential, mixed use and employment site options

6.25 The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed based on the location of the sites. Where site options are located in areas of high flood risk, without mitigation, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. Therefore:

- Site options that are 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 will have a significant negative (--) effect;
- Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding will have a minor negative (-) effect; and
- All other site options will have a negligible (0) effect on the assumption that flood risk could be avoided.

6.26 Levels of water consumption within new development will be determined by sustainable design principles and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses and water bodies and Source Protection Zones. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design,

therefore effects are uncertain at this stage. Therefore, this could result in mixed effects overall:

- Development on sites which contain a water body or watercourse or fall within or partially within a Source Protection Zone 1 could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment;
- Development on sites which do not contain a water body or watercourse but fall within or partially within Source Protection Zones 2 and 3 could result in minor negative effects (-?) on water quality although this is uncertain at this stage of assessment; and
- Development on sites which do not contain a water body or watercourse and do not fall even partially within a Source Protection Zone would have a negligible (0) effect.

SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination

Residential, mixed use and employment site options

6.27 Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites. Where development takes place on previously developed land, land of agricultural value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.

6.28 Consideration is given to both the Provisional Agricultural Land Classification (ALC) and the Post 1988 ALC. The Post 1988 ALC only covers specific areas of the borough and so supersedes the Provision ALC in these specific areas only. Where a site comprises around half brownfield land and half greenfield land, mixed effects will apply.

- Greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3a agricultural land will have a significant negative (--) effect;
- In some areas, it is unknown whether a site comprises Grade 3a (high quality) and/or 3b (not classed as high quality) agricultural land. Therefore, greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 3 agricultural land where it is not specified whether it is Grade 3a or 3b agricultural land, will have an uncertain significant negative (--?) effect;
- Greenfield sites that either contain no or less than a significant proportion ($< 25\%$) of Grade 1, 2 and/or 3 (3a and 3b) agricultural land will have a minor negative (-) effect; and
- Sites that are located on brownfield land will have a significant positive (++) effect.

SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency and contribute to becoming a net zero carbon borough

Residential, mixed use and employment site options

6.29 The proximity of development sites to sustainable transport links will 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. 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, however, whether or not these are delivered are currently uncertain.

6.30 It is considered that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to cycle will depend on factors such as the availability of cycle storage facilities at their end destination and physical ability to cycle, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site.

- Sites that are within 800m of a railway station are likely to have a significant positive (++) effect;
- Sites that are more than 800m from a railway station but within 400m of a bus stop are likely to have a minor positive (+) effect;
- Sites that are more than 800m from a railway station and more than 400m from a bus stop but which have a cycle path within 400m are likely to have a negligible (0) effect; and
- Sites that are more than 800m from a railway station and more than 400m from a bus stop and cycle route could have a minor negative (-) effect.

SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation

Residential, mixed use and employment site options

6.31 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. As such, this objective has been scoped out of the site appraisal work.

SA objective 12: To reduce levels of and exposure to noise, light and air pollution

Residential, mixed use and employment site options

6.32 Development sites that are within, or very close to, the Air Quality Management Areas (AQMA) that have been declared in Tonbridge and Malling, could increase levels of air pollution as a result of increased vehicle traffic. Therefore:

- Site options that are within 100m of an AQMA (including within the AQMA) are likely to have a significant negative (--) effect; and

- Site options that are not within 100m of an AQMA are likely to have a negligible (0) effect on air quality.

SA objective 13: To protect material assets and minimise waste

Residential, mixed use and employment site options

6.33 All new development will likely result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources. Therefore:

- Sites that fall within a Minerals Safeguarding Area could have a minor negative (-?) effect although this is uncertain; and
- Sites that do not fall within a Minerals Safeguarding Area are expected to have a negligible (0) effect.

6.34 The location of development will not affect the other sub-objectives of this objective as effects will largely depend on the detailed proposals for sites and their design, the construction techniques and the actual use of the sites, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage.

SA objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures to meet local needs

Residential site options

6.35 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 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.

Mixed use site options

6.36 For mixed use sites that will incorporate residential development, the likely effects will be as described above for residential sites; however the positive effects will be uncertain (++) and (+?) depending on how much of the site is used for residential development as opposed to other uses.

Employment site options

6.37 The location of employment sites is not considered likely to affect this objective; therefore the effect for all employment site options will be negligible (0).

Table 6.1: Site assessment criteria in table format

SA objective	Site assessment criteria
SA objective 1: To improve human health and well-being	Residential and mixed use site options Residential sites and mixed use sites incorporating residential development that are within close proximity of existing healthcare facilities (e.g. GP surgeries) will ensure that residents have good access to healthcare services. 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. Public health will also be influenced by the proximity of residential and mixed use sites to open spaces, walking and cycle paths, play areas, recreation and sports facilities, easy access to which can encourage participation in active outdoor recreation. Employees working within mixed-use sites may also be more able to commute via active modes and make use of open spaces during breaks. As with healthcare facilities, new development could potentially stimulate the provision of new spaces and facilities for active recreation; however this cannot be assumed at this stage. Therefore: ■ Sites that are within 800m of an existing healthcare facility and an existing area of open space/walking and cycle path/play area/sports facility will have a significant positive (++) effect; ■ Sites that are within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility (but not both) will have a minor positive (+) effect; and ■ Sites that are not within 800m of either an existing healthcare facility or an existing area of open space/walking and cycle path/play area/sports facility will have a minor negative (-) effect. If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such

SA objective	Site assessment criteria
	features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++) or (+/-) effect.
	Employment site options
	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. Therefore: ■ Sites that are within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor positive (+) effect; and ■ Sites that are not within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor negative (-) effect. The effects of all new development (residential, employment and mixed-use) on safety, including levels of crime and fear of crime, will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the policies in the new Local Plan and detailed proposals for each site). If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility, it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (+/-) effect.
SA objective 2: To improve equality and access to community facilities and services	Residential and mixed use site options
	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. Tonbridge including Hilden Park is the main

SA objective	Site assessment criteria
	town within the borough and is the main focus of services and facilities but other settlements also offer a range of services and facilities at varying levels. ■ Sites within a Tier 1-4 settlement will have a significant positive (++) effect; ■ Sites adjacent to a Tier 1-4 settlement will have a minor positive (+) effect; ■ Sites that are within or adjacent to a Tier 5-6 settlement will have a negligible (0) effect; and ■ Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.
	Employment site options
	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. Therefore: ■ Sites within a Tier 1-4 settlement will have a significant positive (++) effect; ■ Sites adjacent to a Tier 1-4 settlement will have a minor positive (+) effect; ■ Sites within or adjacent to a Tier 5-6 settlement will have a negligible (0) effect; and ■ Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.
SA objective 3: To ensure access to education facilities and support skills and training development for all age groups and all sectors of society	Residential and mixed use site options 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. ■ Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school will have an uncertain significant positive (++) effect;

SA objective	Site assessment criteria
	■ Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school (but not both) will have an uncertain minor positive (+?) effect; and ■ Sites that are more than 800m of an existing primary school and more than 1,000m of an existing secondary school will have an uncertain minor negative (-?) effect.
	Employment site options
	The location of employment sites is not considered likely to affect this objective.
SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic inclusion across the borough	Residential site options
	The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore a negligible (0) effect is expected for these site options. However, if a site contains an existing business that could be lost as a result of residential development, a minor negative (-) effect is expected. It is acknowledged that some sites may contain existing businesses that have not been identified within the Call for Sites form.
	Mixed use and employment site options All of the 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 will provide opportunities for the creation of more new jobs and so would have significant positive effects. It is assumed that all mixed use site options will incorporate some element of employment generating uses and could therefore effect the employment opportunities element of this objective. Employment generated from site options is likely to benefit the highest number of residents where sites are accessible by sustainable transport links. Therefore: ■ Sites that include employment development more than 5ha in size will have a significant positive (++) effect; and ■ Sites that include employment development smaller than 5ha in size will have a minor positive (+) effect.

SA objective	Site assessment criteria
	In addition, which could lead to mixed effects overall: ■ Sites that are within 800m of a train station are likely to have a significant positive (++) effect; ■ Sites that are within 400m of a bus stop and/or cycle path (but that are more than 800m from a train station) are likely to have a minor positive (+) effect; and ■ Sites that are not within 800m of a train station or within 400m of a bus stop or cycle path are likely to have a negligible (0) effect.
SA objective 5: To protect and enhance biodiversity and geodiversity	Residential, mixed use and employment site options 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. ■ Sites that are within 250m of one or more internationally or nationally designated [See reference 146] biodiversity or geodiversity sites, or that contain a locally designated site, Ancient Woodland or Priority Habitat, may have a 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 (but do not contain) a locally designated [See reference 147] site, Ancient Woodland or Priority Habitat, may have a minor negative (-?) effect; and

SA objective	Site assessment criteria
	Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a locally designated site, Ancient Woodland or Priority Habitat, could have a negligible (0?) effect.
SA objective 6: To protect and enhance the borough's landscape and townscape character and quality	Residential, mixed use and employment site options 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. - Sites that are located within a settlement will have a negligible (0) effect; - Sites located entirely or mainly on the edge of a settlement will have an uncertain minor negative (-?) effect; and - All sites located entirely or mainly outside of settlements in rural locations, and/or would result in the loss of designated open spaces will have an uncertain significant negative (--?) effect. In addition, proximity to the Kent Downs and High Weald National Landscape can provide an indication of the potential for development to have adverse impacts on those designated landscapes. Sites that are within 1km of the National Landscape, including within the National Landscape, could have a significant negative (--?) effect.
SA objective 7: To protect, conserve and enhance heritage and cultural assets	Residential, mixed use and employment site options Development sites that are within close proximity of a heritage asset have the potential to affect their setting and contribution to the local character and distinctiveness. Heritage assets comprise conservation areas, listed buildings, scheduled monuments and registered parks and gardens. 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.

SA objective	Site assessment criteria
	■ Sites that are located within 250m of a heritage asset may have a significant negative (--?) effect. ■ Sites that are located between 250m-1km of a heritage asset may have a minor negative (-?) effect. ■ Sites that are more than 1km from a heritage asset may have a negligible (0?) effect.
SA objective 8: To protect and enhance the water environment and reduce flood risk	Residential, mixed use and employment site options The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed based on the location of the sites. Where site options are located in areas of high flood risk, without mitigation, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. Therefore: ■ Site options that are 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 will have a significant negative (--) effect; ■ Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding will have a minor negative (-) effect; and ■ All other site options will have a negligible (0) effect on the assumption that flood risk could be avoided. Levels of water consumption within new development will be determined by sustainable design principles and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses and water bodies and Source Protection Zones. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design, therefore effects are uncertain at this stage. Therefore, this could result in mixed effects overall: ■ Development on sites which contain a water body or watercourse or fall within or partially within a Source Protection Zone 1 could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment;

SA objective	Site assessment criteria
	■ Development on sites which do not contain a water body or watercourse but fall within or partially within Source Protection Zones 2 and 3 could result in minor negative effects (-?) on water quality although this is uncertain at this stage of assessment; and ■ Development on sites which do not contain a water body or watercourse and do not fall even partially within a Source Protection Zone would have a negligible (0) effect.
SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination	Residential, mixed use and employment site options Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites. Where development takes place on previously developed land, land of agricultural value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation. Consideration is given to both the Provisional Agricultural Land Classification (ALC) and the Post 1988 ALC. The Post 1988 ALC only covers specific areas of the borough and so supersedes the Provision ALC in these specific areas only. Where a site comprises around half brownfield land and half greenfield land, mixed effects will apply. ■ Greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3a agricultural land will have a significant negative (--) effect; ■ In some areas, it is unknown whether a site comprises Grade 3a (high quality) and/or 3b (not classed as high quality) agricultural land. Therefore, greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 3 agricultural land where it is not specified whether it is Grade 3a or 3b agricultural land, will have an uncertain significant negative (--?) effect; ■ Greenfield sites that either contain no or less than a significant proportion ($< 25\%$) of Grade 1, 2 and/or 3 (3a and 3b) agricultural land will have a minor negative (-) effect; and ■ Sites that are located on brownfield land will have a significant positive (++) effect.

SA objective	Site assessment criteria
SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency and contribute to becoming a net zero carbon borough	Residential, mixed use and employment site options The proximity of development sites to sustainable transport links will 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. 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, however, whether or not these are delivered are currently uncertain. It is considered that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to cycle will depend on factors such as the availability of cycle storage facilities at their end destination and physical ability to cycle, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. ■ Sites that are within 800m of a railway station are likely to have a significant positive (++) effect; ■ Sites that are more than 800m from a railway station but within 400m of a bus stop are likely to have a minor positive (+) effect; ■ Sites that are more than 800m from a railway station and more than 400m from a bus stop but which have a cycle path within 400m are likely to have a negligible (0) effect; and ■ Sites that are more than 800m from a railway station and more than 400m from a bus stop and cycle route could have a minor negative (-) effect.
SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation	Residential, mixed use and employment site options 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. As such, this objective has been scoped out of the site appraisal work.

SA objective	Site assessment criteria
SA objective 12: To reduce levels of and exposure to noise, light and air pollution	Residential, mixed use and employment site options Development sites that are within, or very close to, the Air Quality Management Areas (AQMA) that have been declared in Tonbridge and Malling, could increase levels of air pollution as a result of increased vehicle traffic. Therefore: ■ Site options that are within 100m of an AQMA (including within the AQMA) are likely to have a significant negative (--) effect; and ■ Site options that are not within 100m of an AQMA are likely to have a negligible (0) effect on air quality.
SA objective 13: To protect material assets and minimise waste	Residential, mixed use and employment site options All new development will likely result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources. Therefore: ■ Sites that fall within a Minerals Safeguarding Area could have a minor negative (-?) effect although this is uncertain; and ■ Sites that do not fall within a Minerals Safeguarding Area are expected to have a negligible (0) effect. The location of development will not affect the other sub-objectives of this objective as effects will largely depend on the detailed proposals for sites and their design, the construction techniques and the actual use of the sites, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage.
SA objective 14: To provide a suitable supply of high quality housing including an appropriate mix of	Residential site options 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 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

SA objective	Site assessment criteria
sizes, types and tenures to meet local needs	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.
	Mixed use site options
	For mixed use sites that will incorporate residential development, the likely effects will be as described above for residential sites; however the positive effects will be uncertain (++) and (+) depending on how much of the site is used for residential development as opposed to other uses.
	Employment site options
	The location of employment sites is not considered likely to affect this objective; therefore the effect for all employment site options will be negligible (0).

Chapter 7

Next steps

7.1 In order to meet the requirements of the SEA Regulations, the views of the three statutory consultees (the Environment Agency, Historic England and Natural England) were sought in relation to the scope and level of detail to be included in the SA Scoping Report between May and June 2025. The comments received are detailed in Appendix B and any changes required to the Scoping Report have been made in this final version.

7.2 As the Local Plan is drafted, it will be subject to SA using the SA framework presented in Chapter 5. A full SA Report (incorporating the next stages of the SA process) will then be produced and made available to other stakeholders and the general public for wider consultation alongside the emerging Local Plan.

LUC

June 2025

Appendix A

Review of plans, policies and programmes

International plans and programmes of most relevance for the Local Plan

A.1 Declaration on Climate, Relief, Recovery and Peace (COP28 Declaration) (2023) [See reference 148] – international commitment to address the complex challenges posed by climate change, particularly in the most vulnerable regions. Although non-binding and outside the formal UNFCCC negotiations, this declaration unites the concerns and proposed solutions of countries and institutions across humanitarian, development, climate, and peace sectors. It aims to urgently enhance climate resilience in vulnerable communities that are most affected by climate-related conflicts and crises.

A.2 Convention on Biological Diversity (2022) [See reference 149] – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

A.3 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) – nations adopted the Glasgow Climate Pact [See reference 150]. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce

emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

A.4 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [\[See reference 151\]](#) – international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

A.5 The 2030 Agenda for Sustainable Development (2015) [\[See reference 152\]](#) – adopted by all United Nations Member States, provides a shared blueprint for peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

A.6 The United Nations Paris Climate Change Agreement (2015) [\[See reference 153\]](#) – an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

A.7 The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998) [\[See reference 154\]](#) – establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

A.8 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) [\[See reference 155\]](#) – sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

A.9 The International Convention on Wetlands (Ramsar Convention) (1976) [\[See reference 156\]](#) – an international agreement with the aim of conserving and managing the use of wetlands and their resources.

A.10 The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) [\[See reference 157\]](#) – aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

A.11 The International Convention on Biological Diversity (1992) [\[See reference 158\]](#) – is an international commitment to biodiversity conservation through national strategies and action plans.

A.12 The European Habitats Directive (1992) [\[See reference 159\]](#) – together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

A.13 The European Birds Directive (2009) [\[See reference 160\]](#) – requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

A.14 The United Nations Declaration on Forests (New York Declaration) (2014) [\[See reference 161\]](#) – sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

A.15 The Valletta Treaty (1992) [\[See reference 162\]](#), formerly the European Convention on the Protection of the Archaeological Heritage (Revisited) – aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

A.16 The United Nations (UNESCO) World Heritage Convention (1972) [See reference 163] – promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

A.17 The European Convention for the Protection of the Architectural Heritage of Europe (1985) [See reference 164] – defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

A.18 The European Landscape Convention (2002) [See reference 165] – promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National plans and programmes (beyond the NPPF) of post relevance for the Local Plan

Climate change adaptation and mitigation

A.19 Met Office, State of the UK Climate (2024) [See reference 166] – the tenth in the annual series of reports that provide a summary of the UK weather and climate through the calendar year 2023, alongside the historical context for a number of essential climate variables. It provides an accessible, authoritative and up-to-date assessment of UK climate trends, variations and extremes based on the most up to date observational datasets of climate quality.

Appendix A Review of plans, policies and programmes

A.20 HM Government, The Carbon Budget Delivery Plan (2023) [\[See reference 167\]](#) – explains how the Government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

- wider matters in connection with carbon budgets
- the contribution of these proposals and policies to sustainable development
- the impact the package has on sectors of the economy

A.21 Department for Energy Security and Net Zero, Powering up Britain (2023) [\[See reference 168\]](#) – sets out the department's approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

A.22 HM Government, The Net Zero Growth Plan (2023) [\[See reference 169\]](#) – outlines the Government's plans to reach net zero and unlock the financial benefits that this can bring.

A.23 Defra, The Environment Improvement Plan 2023 [\[See reference 170\]](#) for England is the first revision of the 25YEP – it builds on the 25YEP vision with a new plan setting out how they will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

A.24 HM Government, UK Climate Change Risk Assessment 2022 [\[See reference 171\]](#) – outlines the UK government and devolved administrations' position on the key climate change risks and opportunities that the UK faces today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

Appendix A Review of plans, policies and programmes

- risks to the viability and diversity of terrestrial and freshwater habitats and species from multiple hazards
- risks to soil health from increased flooding and drought
- risks to natural carbon stores and sequestration from multiple hazards
- risks to crops, livestock and commercial trees from multiple climate hazards
- risks to supply of food, goods and vital services due to climate-related collapse of supply chains and distribution networks
- risks to people and the economy from climate-related failure of the power system
- risks to human health, wellbeing and productivity from increased exposure to heat in homes and other buildings
- multiple risks to the UK from climate change impacts overseas

A.25 Department for Energy Security and Net Zero, Prime Minister's Office, 10 Downing Street, and Department for Business, The British Energy Security Strategy (2022) [\[See reference 172\]](#) – sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.

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- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new offshore wind farms from 4 years to 1 year and an overall streamlining which will aims to reduce the time it takes for new projects to reach construction stages while improving the environment.
- Oil and gas – A licensing round for new North Sea oil and gas projects is planned to launch in Autumn, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aim to run a Heat Pump Investment Accelerator Competition in 2022 worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

A.26 HM Government, The Environment Act 2021 [\[See reference 173\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

- Long-term targets to improve air quality biodiversity, water, and waste reduction and resource efficiency.
- A target on ambient PM2.5 concentrations.
- A target to halt the decline of nature by 2030.
- Environmental Improvement Plans, including interim targets.
- A cycle of environmental monitoring and reporting.
- Environmental Principles embedded in domestic policy making.
- Office for Environmental Protection to uphold environmental law.

A.27 HM Government, The Net Zero Strategy: Build Back Greener (2021) [See reference 174] – sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).
- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

A.28 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy, The Industrial Decarbonisation Strategy (2021) [See reference 175] – aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister's 10 Point Plan for a Green Industrial Revolution and sets out the government's vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government's path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry's energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK's largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes – approximately 10% of their current emissions. Other key commitments within the Strategy include:

- The use of carbon pricing to drive changes in industry to focus on emissions in business and investment decisions.

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- To establish a policy framework to accelerate the switch from fossil fuels to low carbon alternatives such as hydrogen, electricity, or biomass.
- New product standards, enabling manufacturers to clearly distinguish their products from high carbon competitors.
- To ensure the land planning regime is fit for building low carbon infrastructure.
- Support the skills transition so that the UK workforce benefits from the creation of new green jobs.
- An expectation that at least 3 megatons of CO₂ is captured within industry per year by 2030.
- That by 2050, there will be zero avoidable waste of materials across heavy industries.

A.29 Department for Business, Energy & Industrial Strategy, The Heat and Buildings Strategy (2021) [\[See reference 176\]](#) – sets out the Government's plan to significantly cut carbon emissions from the UK's 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.

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- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio 'Heat Pump Ready' Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.
- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning – Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

A.30 Department for Energy Security and Net Zero, The UK Hydrogen Strategy (2021) [\[See reference 177\]](#) – sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

A.31 HM Government, The Energy Performance of Buildings Regulations (2021) [\[See reference 178\]](#) – seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

A.32 Defra, The Waste Management Plan for England (2021) [\[See reference 179\]](#) – sets out the measures for England to work towards a zero waste economy.

A.33 Department for Business, Energy & Industrial Strategy, The Energy white paper: Powering our net zero future (2020) [\[See reference 180\]](#) – builds on the Prime Minister’s Ten point plan for a green industrial revolution. The white paper addresses the transformation of the UKs energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050. Key aims of the paper include:

- Supporting green jobs – The government aims to support up to 220,000 jobs in the next 10 years.
- Transforming the energy system – To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.
- Keeping bills affordable – The government aims to do this by making the energy retail market “truly competitive”. This will include offering people a method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle “loyalty penalties”.
- Generating emission-free electricity by 2050 – The government aims to have “overwhelmingly decarbonised power” in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme – The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.

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- Exploring new nuclear financing options – The government is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind – The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments – Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy – The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points – The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars.
- Supporting the lowest paid with their bills – The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400.
- Moving away from fossil fuel boilers – The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition – The white paper notes the importance of supporting the North Sea oil and gas transition for the people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

A.34 HM Treasury, National Infrastructure Strategy: Fairer, faster greener (2020) [\[See reference 181\]](#) – sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment

and through a comprehensive set of reforms to the way infrastructure is delivered.

A.35 Climate Change Committee, The Sixth Carbon Budget report (2020) [\[See reference 182\]](#) – based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, the report builds on the evidence published last year for their Net Zero advice. Their recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

A.36 Department for Transport, Decarbonising Transport: Setting the Challenge (2020) [\[See reference 183\]](#) – sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

A.37 HM Government, Flood and Coastal Erosion Risk Management: Policy Statement (2020) [\[See reference 184\]](#) – sets out the Government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;
- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and

- Enabling more resilient places through a catchment-based approach.

A.38 HM Government, The Waste (Circular Economy) (Amendment) Regulations (2020) [See reference 185] – seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

A.39 Climate Change Committee, Net Zero – The UK’s contribution to stopping global warming (2019) [See reference 186] – responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK’s long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report’s key findings are that:

- The Committee on Climate Change recommends a new emissions target for the UK: net-zero greenhouse gases by 2050.
- In Scotland, we recommend a net-zero date of 2045, reflecting Scotland’s greater relative capacity to remove emissions than the UK as a whole.
- In Wales, we recommend a 95% reduction in greenhouse gases by 2050.

A.40 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018) [See reference 187] – sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and work in them are resilient and organisations in the built environment sector have an increased capacity to

address the risks and make the most of the opportunities of a changing climate.”

- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate.”
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local Government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

A.41 Our Waste, Our Resources: A strategy for England (2018) [See reference 188] – aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

A.42 HM Government, The Clean Growth Strategy (2017) [See reference 189] – sets out the approach of the Government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

A.43 Department for Communities and Local Government, The National Planning Policy for Waste (NPPW) (2014) [\[See reference 190\]](#) – identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

A.44 Department of Energy & Climate Change, The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK 2012 [\[See reference 191\]](#) – aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

A.45 HM Government, The Promotion of the Use of Energy from Renewables Sources Regulations 2011 [\[See reference 192\]](#) – required the Government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU's 2030 "targets" and the UK's 2030 "ambitions" for renewable energy and energy efficiency.

A.46 HM Government, The National Flood and Coastal Erosion Risk Management Strategy for England 2011 [\[See reference 193\]](#) – sets out the

national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property;
- Facilitate decision-making and action at the appropriate level – individual, community or Local Authority, river catchment, coastal cell or national; and
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

A.47 HM Government, The Flood and Water Management Act 2010 [\[See reference 194\]](#) and The Flood and Water Regulations 2019 [\[See reference 195\]](#) – sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

A.48 HM Government, The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) [\[See reference 196\]](#) – sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

A.49 HM Government, The UK Renewable Energy Strategy (2009) [\[See reference 197\]](#) – sets out the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

A.50 HM Government, The Climate Change Act 2008 [\[See reference 198\]](#) – sets targets for UK greenhouse gas emission reductions of at least 100% by

2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

A.51 HM Government, The Planning and Energy Act (2008) [\[See reference 199\]](#) – enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

Health and well-being

A.52 The Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration Act (2023) [\[See reference 200\]](#) – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

A.53 Natural England, The Green Infrastructure Framework (2023) [\[See reference 201\]](#) – the framework will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future

A.54 Department for Levelling Up, Housing and Communities and Homes Office Anti-Social Behaviour Action Plan (2023) [\[See reference 202\]](#) – sets out a comprehensive strategy to combat anti-social behaviour (ASB) and restore public confidence in community safety. The plan emphasises a zero-tolerance approach and introduces several key measures, including increasing the use of hotspot policing and enforcement, and changing laws and systems to take a zero-tolerance approach to anti-social behaviour.

A.55 Homes England, The Homes England Strategic Plan 2023 to 2028 (2023) [\[See reference 203\]](#) – sets out a vision to drive regeneration and housing delivery, to ensure that more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

A.56 Department for Levelling Up, Housing and Communities, The White Paper Levelling Up the United Kingdom (2022) [\[See reference 204\]](#) – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and wellbeing state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.

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- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

A.57 Department for Levelling Up, Housing and Communities, A fairer private rented sector White Paper (2022) [\[See reference 205\]](#) – aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

A.58 The National Design Guide (2021) [\[See reference 206\]](#) – sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. Environment Agency, The State of the Environment: Health, People and the Environment (2021) [\[See reference 207\]](#) focuses on the relationship between human health and people's access to and connection with a clean, high quality natural environment. It presents information on England's environment, and people's exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

A.59 HM Government, Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 208\]](#) – sets out the Government's new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government's plan to introduce a new Health and Social Care Levy.

A.60 HM Government, The COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) [\[See reference 209\]](#) – sets out the Government’s plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental wellbeing; to take action to address factors which play a crucial role in shaping mental health and wellbeing outcomes; and, to support services to meet the need for specialist support.

A.61 Ministry of Housing, Communities & Local Government, The Charter for Social Housing Residents: Social Housing White Paper (2020) [\[See reference 210\]](#) – sets out the Government’s actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

A.62 Public Health England, Using the planning system to promote healthy weight environments (2020), Addendum (2021) [\[See reference 211\]](#) – provides a framework and starting point for local authorities to clearly set out in local planning guidance how best to achieve healthy weight environments based on local evidence and needs, by focusing on environments that enable healthier eating and help promote more physical activity as the default. The Addendum provides updates on the implications for planning for a healthier food environment, specifically on the hot food takeaways retail uses, and sets out recommended actions in light of changes to the Use Class Order (UCO) in England from 1 September 2020.

A.63 Public Health England, PHE Strategy 2020-25 (2019) [\[See reference 212\]](#) – identifies PHE’s priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

A.64 Homes England, The Homes England Strategic Plan 2018 to 2023 [\[See reference 213\]](#) – sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

A.65 Ministry of Housing, Communities & Local Government, The Housing White Paper 2017 (Fixing our broken housing market) [\[See reference 214\]](#) – sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

- Planning for the right homes in the right places – Higher densities in appropriate areas, protecting the Green Belt while making more land available for housing by maximising the contribution from brownfield and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements.
- Building homes faster – Improved speed of planning cases, ensuring infrastructure is provided and supporting developers to build out more quickly.
- Diversifying the Market – Backing small and medium-sized house builders, custom-build, institutional investors, new contractors, housing associations.
- Helping people now – supporting home ownership and providing affordable housing for all types of people, including the most vulnerable.

A.66 Ministry of Housing, Communities and Local Government, The Planning Policy for Traveller Sites 2015 [\[See reference 215\]](#) – sets out the Government’s planning policy for traveller sites, replacing the older version published in March 2012. The Government’s overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

A.67 Department for Communities and Local Government, The Technical Housing Standards – Nationally Described Space Standard (2015) [\[See reference 216\]](#) – sets out the Government’s new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

A.68 UK Parliament, The Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013) [\[See reference 217\]](#) – warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

A.69 Institute of Health Equity, Fair Society, Healthy Lives (2011) [\[See reference 218\]](#) – investigates health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

A.70 HM Government, Laying the foundations: A housing strategy for England [\[See reference 219\]](#) – aims to provide support to deliver new homes and improve social mobility.

A.71 HM Government, Healthy Lives, Healthy People: Our strategy for public health in England 2010 [\[See reference 220\]](#) – sets out how the Government’s approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline;
- Empower local leadership and encourage wide responsibility across society to improve everyone’s health and wellbeing and tackle the wider factors that influence it;
- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework;
- Reflect the Government’s core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal

responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and

- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

A.72 HM Government, The Environmental Noise Regulations 2006 [\[See reference 221\]](#) – the Regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

Environment (biodiversity/geodiversity, landscape and soils)

A.73 Defra, The Environment Improvement Plan 2023 [\[See reference 222\]](#) for England is the first revision of the 25YEP – it builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

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- Goal 1: Thriving plants and wildlife
- Goal 2: Clean air
- Goal 3: Clean and plentiful water
- Goal 4: Managing exposure to chemicals and pesticides
- Goal 5: Maximise our resources, minimise our waste
- Goal 6: Using resources from nature sustainably
- Goal 7: Mitigating and adapting to climate change
- Goal 8: Reduced risk of harm from environmental hazards
- Goal 9: Enhancing biosecurity
- Goal 10: Enhanced beauty, heritage, and engagement with the natural environment

A.74 Defra, The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) [\[See reference 223\]](#) – sets out government’s priorities for managing resources and waste, in line with the resources and waste strategy for England.

A.75 Defra, 25 Year Environment Plan: progress reports (2023) [\[See reference 224\]](#) – sets out the progress made in improving the environment through the 25 Year Plan and the indicator framework, which contains 66 indicators arranged into 10 broad themes.

A.76 Environment Agency, Working with nature (2022) [\[See reference 225\]](#) – discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats, wildlife and ecosystems: land use; climate change; pollution; invasive non-native species; and hydrological change.

A.77 Defra, Establishing the Best Available Techniques for the UK (UK BAT) (2022) [\[See reference 226\]](#) – sets out a new framework that aims to improve

industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

A.78 HM Government, The Environment Act 2021 [\[See reference 227\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

- Strengthened biodiversity duty. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development.
- Biodiversity net gain to ensure developments deliver at least 10% increase in biodiversity
- Local Nature Recovery Strategies to support a Nature Recovery Network.
- Duty upon Local Authorities to consult on street tree felling.
- Strengthen woodland protection enforcement measures.
- Conservation Covenants.
- Protected Site Strategies and Species Conservation Strategies to support the design and delivery of strategic approaches to deliver better outcomes for nature.
- Prohibit larger UK businesses from using commodities associated with wide-scale deforestation.
- Requires regulated businesses to establish a system of due diligence for each regulated commodity used in their supply chain, requires regulated businesses to report on their due diligence, introduces a due diligence enforcement system.

A.79 Natural England, Climate Change Adaptation Manual (2020) [See reference 228] – a resource to support practical and pragmatic decision-making relating to climate change adaptation. The manual brings together recent science, experience and case studies to be used by managers of nature reserves and other protected sites, conservation and land management advisors, and environmental consultants.

A.80 Defra, Landscapes Review (2019) [See reference 229] – explores the fragmented and often marginalised system of managing National Parks and AONBs recommends actions to achieve structural reform. The review looks at:

- The existing statutory purposes for National Parks and AONBs and how effectively they are being met.
- The alignment of these purposes with the goals set out in the 25 Year Environment Plan.
- The case for extension or creation of new designated areas.
- How to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets.
- The financing of National Parks and AONBs.
- How to enhance the environment and biodiversity in existing designations.
- How to build on the existing eight point plan for National Parks and connect more people with the natural environment from all sections of society and improve health and wellbeing.
- How well National Parks and AONBs support communities.
- The process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

A.81 HM Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [See reference 230] – protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

A.82 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018) [\[See reference 231\]](#) – sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The gov.uk website notes that the 25 Year Plan sits alongside two other important government strategies: the Industrial Strategy and Clean Growth Strategy (the former summarised in the Economic growth section below, the latter under Climate Change above).

A.83 HM Government, Environmental Damage (Prevention and Remediation) Regulations 2015 [\[See reference 232\]](#) – wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

A.84 Defra, Biodiversity offsetting in England Green Paper (2013) [\[See reference 233\]](#) – biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

A.85 Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) [\[See reference 234\]](#) – guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

A.86 Defra Right of Way Circular (1/09) (2011) [\[See reference 235\]](#) – gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

A.87 HM Government, The Countryside and Rights of Way Act 2010 [\[See reference 236\]](#) – an Act of Parliament to make new provision for public access to the countryside.

A.88 Defra, Safeguarding our Soils – A Strategy for England (2009) [\[See reference 237\]](#) – sets out how England’s soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

A.89 Defra, England Biodiversity Strategy Climate Change Adaptation Principles (2008) [\[See reference 238\]](#) – sets out principles to guide adaptation to climate change. The principles are: take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these. Natural Environment and Rural Communities Act 2006.

A.90 HM Government, The Natural Environment and Rural Communities Act 2006 [\[See reference 239\]](#) – places a duty on public bodies to conserve biodiversity.

A.91 HM Government, Wildlife and Countryside Act 1981 (as amended) [\[See reference 240\]](#) – enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

A.92 HM Government, The National Parks and Access to the Countryside Act 1949 [\[See reference 241\]](#) – an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Historic environment

A.93 Historic England, Corporate Plan 2023-2026 (2023) [\[See reference 242\]](#) – contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

A.94 Department for Digital, Culture Media & Sport, The Heritage Alliance, The Heritage Statement 2017 [\[See reference 243\]](#) – sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

A.95 Historic England, Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [\[See reference 244\]](#) – sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

A.96 HM Government, The Government's Statement on the Historic Environment for England 2010 [\[See reference 245\]](#) – sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the

historic environment within the Government's response to climate change and the wider sustainable development agenda.

A.97 HM Government, The Planning (Listed Buildings and Conservation Areas) Act 1990 [\[See reference 246\]](#) – an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

A.98 HM Government, The Ancient Monuments and Archaeological Areas Act 1979 [\[See reference 247\]](#) – a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

A.99 HM Government, The Historic Buildings and Ancient Monuments Act 1953 [\[See reference 248\]](#) – an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Water and air

A.100 Defra, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) [\[See reference 249\]](#) – sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The Plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

A.101 The Air quality strategy for England (2023) [\[See reference 250\]](#) – sets out local authorities powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

A.102 The Environment Act 2021 [\[See reference 251\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

- Resource efficiency, producer responsibility, and the management, enforcement and regulation of waste;
- Local air quality management frameworks and the recall of motor vehicles etc; and
- Plans and proposals for water resources, drainage and sewerage management, storm overflows, water quality and land drainage.

A.103 Environment Agency, Managing Water Abstraction (2021) [\[See reference 252\]](#) – the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

A.104 CIEEM, National Chalk Streams Strategy (2021) [\[See reference 253\]](#) – built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

A.105 Environment Agency, Meeting our future water needs: a national framework for water resources (2020) [\[See reference 254\]](#) – sets the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

- leave the environment in a better state than we found it
- improve the nation’s resilience to drought and minimise interruptions to all water users

A.106 Defra, The Clean Air Strategy (2019) [\[See reference 255\]](#) – sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide

powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

A.107 Department for Transport, The Road to Zero (2018) [\[See reference 256\]](#) – sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

A.108 HM Government, Our Waste, Our Resources: A strategy for England (2018) [\[See reference 257\]](#) – aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

A.109 Environment Agency, The Environment Agency's Approach for Groundwater Protection (2018) [\[See reference 258\]](#) – contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

A.110 HM Government, The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) [\[See reference 259\]](#) – protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect,

enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

A.111 Defra, The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) [\[See reference 260\]](#) – sets out the Government’s ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

A.112 Environment Agency, Drought response: our framework for England (2017) [\[See reference 261\]](#) – tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

- how drought affects different parts of England
- who is involved in managing drought and how we work together
- how we and others take action to manage drought
- how we monitor and measure the impacts of drought to advise senior management and government on the prospects and possible action
- how we report on drought and communicate with others

A.113 HM Government, The Nitrate Pollution Prevention Regulations (2016) [\[See reference 262\]](#) – provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored.

It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

A.114 HM Government, The Water Supply (Water Quality) Regulations (2016) [\[See reference 263\]](#) – focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

A.115 HM Government, The Environmental Permitting Regulations (2016) [\[See reference 264\]](#) – streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

A.116 HM Government, The Air Quality Standards Regulations (2016) [\[See reference 265\]](#) – set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

A.117 Defra, The Water White Paper (2012) [\[See reference 266\]](#) – sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

A.118 HM Government, The National Policy Statement for Waste Water (2012) [\[See reference 267\]](#) – sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

A.119 HM Government, The Flood and Water Management Act 2010 [See reference 268] and The Flood and Water Regulations (2019) [See reference 269] – sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

A.120 HM Government, Groundwater (England and Wales) Regulations (2009) [See reference 270] – implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

A.121 HM Government, Flood Risk Regulations (2009) [See reference 271] – these Regulations outline a set of tasks, which the county council is required to follow between now and approximately 2015. The regulations also implement the 2007 EU Floods Directive. In accordance with the regulations the council has a series of new responsibilities, these are:

- The preparation of a Preliminary Flood Risk Assessment (PFRA) Report, including the identification of flood risk areas
- The preparation of Flood Hazard Maps and Flood Risk Maps
- The preparation of Flood Risk Management Plans
- Cooperating with the Environment Agency and other Lead Local Flood Authorities.

A.122 HM Government, Future Water: The Government's Water Strategy for England (2008) [\[See reference 272\]](#) – sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

A.123 Defra, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) [\[See reference 273\]](#) – sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the strategy are to:

- Further improve air quality in the UK from today and long term; and
- Provide benefits to health quality of life and the environment.

A.124 HM Government, The Environmental Noise Regulations (2006) [\[See reference 274\]](#) – apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

A.125 HM Government, The Urban Waste Water Treatment Regulations (2003) [\[See reference 275\]](#) – protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water

and specifies how different types of waste water should be treated, disposed and reused.

A.126 HM Government, The Environmental Protection Act (1990) [See reference 276] – makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Economic growth

A.127 UK Parliament, The Levelling Up and Regeneration Act (2023) [See reference 277] – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

A.128 The Department for Levelling Up, Housing and Communities, Levelling Up the United Kingdom White Paper (2022) [See reference 278] – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills

training annually, driven by 80,000 more people completing courses in the lowest skilled areas.

- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

A.129 HM Treasury, The Growth Plan (2022) [\[See reference 279\]](#) – makes growth the government’s central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer’s “growth plan” contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

A.130 HM Treasury, Build Back Better: Our Plan for Growth (2021) [\[See reference 280\]](#) – sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

A.131 Defra, The Agricultural Transition Plan 2021 to 2024 (2020) [\[See reference 281\]](#) – aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

A.132 HM Government, The Agriculture Act (2020) [\[See reference 282\]](#) sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

A.133 HM Government, UK Industrial Strategy: Building a Britain fit for the future (2018) [\[See reference 283\]](#) – lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

A.134 LEP Network, The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [\[See reference 284\]](#) – seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

A.135 Infrastructure and Projects Authority, The National Infrastructure Delivery Plan 2016-2021 (2016) [\[See reference 285\]](#) – brings together the Government’s plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

Transport

A.136 The Department for Transport, Future of Transport: supporting rural transport innovation (2023) [\[See reference 286\]](#) – shows how innovative and emerging transport technologies could address some of the major challenges in rural communities. It highlights the importance of transport to everyday life rural

life and provides guiding principles for the introduction of new technologies and services.

A.137 The Department for Levelling Up, Housing and Communities, Levelling Up the United Kingdom White Paper (2022) [\[See reference 287\]](#) – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030, which includes the following key mission relating to transport and travel:

- By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

A.138 Secretary for Transport, The Cycling and Walking Investment Strategy Report to Parliament (2022) [\[See reference 288\]](#) – sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

A.139 Department for Transport, Future of freight plan (2022) [\[See reference 289\]](#) – the vision is to create a freight and logistics sector that is cost-efficient, reliable resilient, environmentally sustainable and valued by society. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas:

- National Freight Network (NFN)
- Enabling the transition to net zero
- Planning
- People and skills
- Data and technology

A.140 Department for Transport, Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [\[See reference 290\]](#) – sets out the Government’s commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

A.141 HM Government, The Environment Act 2021 [\[See reference 291\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

A.142 Department for Transport, Decarbonising Transport: Setting the Challenge (2020) [\[See reference 292\]](#) – sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector’s contribution to both carbon budgets and net zero.

A.143 Department for Transport, Jet Zero Strategy Delivering net zero aviation by 2050 (2020) [\[See reference 293\]](#) – aims to reduce in-sector emissions from aviation by around 50% by 2050. The strategy is underpinned by three principles:

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- International leadership: Leading coordinated global efforts to tackle international aviation emissions, including through ongoing work in the International Civil Aviation Organization.
- Delivered in partnership: Working with all parts of the sector and different partners to develop, test, implement and invest in the solutions needed.
- Maximising opportunities: Using the opportunity of the Jet Zero transition to boost the economy, create new jobs, develop new industries, and become a more energy secure nation.

A.144 Department for Transport, The Road to Zero (2018) [\[See reference 294\]](#) – sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

A.145 Department for Transport, The Transport Investment Strategy 2017 [\[See reference 295\]](#) – sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

A.146 Highways England, The Highways England Sustainable Development Strategy and Action Plan (2017) [\[See reference 296\]](#) – designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations

of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

A.147 Department for Transport, Airports: The Government's View Summary Document – Moving Britain Ahead (2016) [\[See reference 297\]](#) – supports the construction of a new runway at Heathrow airport to provide strategic and economic benefits to the UK, offering the best deal for passengers and increasing the number of UK airports connected to Heathrow.

A.148 Department for Transport, Door to Door: A strategy for improving sustainable transport integration (2013) [\[See reference 298\]](#) – focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options;
- Convenient and affordable tickets;
- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

A.149 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Sub-national plans and programmes of most relevance to the Local Plan

A.150 Kent County Council, Commissioning Plan for Education Provision in Kent 2025-2029 (2025) [\[See reference 299\]](#) – a five year rolling plan which

serves as a strategic framework to ensure that there are sufficient educational places available in the right locations to meet the needs of all learners. It focuses on planning for future demand, addressing demographic changes, and ensuring that high-quality education is accessible to all students, including those with special educational needs and disabilities (SEND).

A.151 Tonbridge and Malling Borough Council, Annual Service Delivery Plan 2025/26 (2025) [\[See reference 300\]](#) – sets out the priority actions for the year, along with key milestones and targets that could be used to monitor whether the Council was on track with delivery. The Plan also provided the opportunity to realign the Key Performance Indicators, strengthened accountability and aligned priorities with budget setting.

A.152 Kent County Council, Local Transport Plan 5: Striking the Balance 2024 – 2037 (2024) [\[See reference 301\]](#) – provides the overarching strategy for the full transport mix in Kent. It outlines ambitions, outcomes, and objectives to be delivered by proposals in the plan to enhance transport across Kent over the next 13 years. The plan aims to improve all types of journeys by focusing on roads, public transport, walking, cycling, and other modes of travel.

A.153 Kent County Council, Local Flood Risk Management Strategy 2024 – 2034 (2024) [\[See reference 302\]](#) – sets out how local flood risk will be managed in the county by the local authorities involved. The strategy is designed to reduce the risk of flooding in Kent by providing a framework for managing surface water, groundwater, and ordinary watercourse flooding. The objectives of the local strategy are:

- Improve Risk Management Authorities' understanding of local flood risk mechanisms in Kent including the risks resulting from climate change, and to share this understanding with partners to create an evidence base for flood risk and climate adaptation.
- Protect the people and businesses of Kent from flooding through the delivery of flood risk management projects and programmes using new or innovative techniques where appropriate.

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- Development and infrastructure delivery in Kent takes an active role in flood risk management, taking opportunities to manage on-site and off-site flood risk.
- Residents and businesses of Kent are able to better prepare, understand and manage their own flood risk as appropriate, by having access to relevant flood risk information and support from risk management authorities. Communities and individuals are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working.
- NHS Kent and Medway, Medway Joint Local Health and Wellbeing Strategy 2024 – 2028 (2024) [\[See reference 303\]](#) provides a high-level framework for improving health and wellbeing in Medway. The strategy is used to inform commissioning across the health and care system. The strategy covers 4 main themes for Medway:
 - healthier, longer lives for everyone
 - reduce poverty and inequality
 - safe, connected and sustainable places
 - connected communities and cohesive services.

A.154 Tonbridge and Malling Borough Council, Tonbridge and Malling Community Safety Partnership Plan 2024-2025 (2024) [\[See reference 304\]](#) – sets out the objectives that the Partnership will work towards to address community safety issues in the Borough over the coming year. The plan is based on a Strategic Assessment that uses current data and trends to identify priorities aimed at reducing and addressing crime and disorder in the area. The priorities agreed through the Strategic Assessment for 2024/25 are:

- Anti-Social Behaviour – including environmental crime
- Acquisitive Crime – including shoplifting, theft and burglary
- Domestic Abuse
- Preventing Extremism and Hate

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- Safeguarding Vulnerable people – including mental health, child criminal sexual exploitation, gangs, modern slavery and human trafficking, substance misuse and youth diversion
- Tackling violent crime – including Serious Violence, Violence Against Women and Girls and Stalking

A.155 High Weald National Landscape, The High Weald National Landscape AONB Management Plan 2024-2029 (2024) [\[See reference 305\]](#) – outlines a strategic approach to conserving and enhancing the area's natural beauty, biodiversity, and cultural heritage.

A.156 Tonbridge and Malling Borough Council Corporate Strategy 2023-2027 (2023) [\[See reference 306\]](#) – follows on from the 2020-2023 Corporate Strategy. It provides a vision for the next three years for the Council to continue to be financially sustainable with strong leadership that delivers valued services and a commitment to delivering innovation and change to meet the needs of the borough.

A.157 Tonbridge and Malling Borough Council Economic Development Strategy 2023-2027 [\[See reference 307\]](#) – focuses on fostering a resilient, dynamic, and inclusive economy. The strategy emphasises the need for sustainable growth through “Investing in our local economy to help support residents and businesses and foster sustainable growth.” Key initiatives the strategy focuses on includes efforts to market Tonbridge and Malling as a tourism destination, and offers various initiatives, such as grants and mentoring for local businesses. This includes green grants designed to help at least 20 businesses reduce their carbon footprints.

A.158 Kent County Council, Kent Drug and Alcohol Strategy 2023-2028 (2022) [\[See reference 308\]](#) – seeks to address the harms associated with alcohol and drug use, with a focus on fostering partnerships to tackle both the root causes and the consequences of substance abuse.

A.159 Southern Water, Medway River Basin Catchment Drainage and Wastewater Management Plan (2022) [\[See reference 309\]](#) – identifies the

main challenges relating to drainage and wastewater systems as the growing population, the changing climate and environmental need. The plan aims to:

- Reduce the number of spills from the 238 storm overflows which together currently spill around 4,300 times per annum.
- Separate or attenuate excess rainwater in the sewer networks to reduce the risks of flooding and frequency of storm overflow discharges, especially in Motney Hill, Ticehurst, Hildenborough, High Halden, Penshurst and Gravesend.
- Investigate the potential impact of wastewater discharges on the Swale and Medway Estuary and Marshes and identifying the requirements to achieve nutrient neutrality and Good Ecological Status/Potential.
- Plan for potential significant developments at Northfleet, Rochester Riverside, Hoo, Chatham Docks, Paddock Wood, Tudley, South Godstone, Ebbsfleet and the Invicta Park Barracks at Maidstone.
- Improve the resilience of our networks and treatment works to prevent pollution incidents, particularly in Tunbridge Wells, Crowborough, Hildenborough and Paddock Wood.
- Reduce the risk of sewer blockages by increasing sewer jetting and targeting customer campaigns to reduce the amount of FOG (fats, oils and grease) and non-flushables in the sewer network around Rochester, Gillingham and Chatham.

A.160 Reduce the risk to groundwater by reducing leakage from our sewers in the Sittingbourne, Strood, Rochestester, Chatham, Gillingham and Rainham areas

A.161 Kent County Council, Framing Kent's Future 2022 – 2026 (2022) [\[See reference 310\]](#) – sets out the priorities that the Council will focus on over the next four years to tackle the challenges and make the most of the opportunities that the county is facing. The strategy is based around four key priorities that will frame the Council's response to the challenges and opportunities up to 2026:

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- Levelling up Kent – The momentum of the national Levelling Up agenda will be used make Kent a successful place and narrow the gaps in outcomes between different parts of Kent and between Kent and the rest of the South East.
- Infrastructure for communities – as the county continues to grow, the Council will seek to ensure that all communities, new and existing, have the right infrastructure around them for a good quality of life.
- Environmental step change – Kent County Council plans to build on its efforts to achieve ambitious Net Zero targets while addressing the climate impacts already being experienced. This includes protecting and enhancing the natural environment, collaborating with partners to make Kent Net Zero by 2050.
- New models of care and support – the Council aims to take advantage of opportunities to address the demand and resource challenges facing people-based services, with a focus on providing better care and support. This includes integrating social care and public health services with partners, and supporting vulnerable children and families.

A.162 Kent County Council, Making A Difference Everyday: Our Adult Social Care Strategy 2022 to 2027 (2022) [\[See reference 311\]](#) – outlines Kent's vision for social care, seeking to support residents to live as full and safe a life as possible and make informed choices.

A.163 Tonbridge and Malling Borough Council, Air Quality Action Plan (2022) [\[See reference 312\]](#) – outlines four key priority areas. The overarching aim of this Action Plan is to address the AQMA and further aid a behavioural shift to promote sustainable methods of transport. This will help reduce the levels of harmful pollutants and the potential threat to health and wellbeing of the population within the borough.

A.164 Across the transport sector, the Air Quality Action Plan intends to implement a series of measures to achieve the overarching aim – these include developing a Quality Bus Partnership Scheme, encouraging taxi/private hire companies to switch to low emission vehicles, and developing Freight Quality

Partnerships in addition to other measures. From a planning and infrastructure perspective, the Council outlines the additional measures including the installation of electric charging points and installation of green walls and vegetation across the borough. These measures need to be considered for any future development.

A.165 Tonbridge and Malling Borough Council: Borough Economic Recovery Strategy 2021-2023 (2021) [\[See reference 313\]](#) – seeks address the economic recovery following the COVID-19 pandemic and the severity of its effect on business activity on both national and local levels.

A.166 Kent Downs National Landscape, The Kent Downs National Landscape Management Plan 2021-2026 (2021) [\[See reference 314\]](#) – seeks to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened well into the future.

A.167 Tonbridge & Malling Borough Council Housing Delivery Test Action Plan (2021) [\[See reference 315\]](#) – outlines the issues affecting the housing supply in Tonbridge and Malling Borough and identifies actions to help boost the delivery of new homes, which include the adoption of the up-to-date Local Plan, development of an Urban Capacity Study, and through Planning Performance Agreements (PPAs).

A.168 Kent Nature Partnership, Biodiversity Strategy 2020 to 2045 (2020) [\[See reference 316\]](#) – sets out how the county will deliver healthy sustainable and coherent biodiversity in Kent. It aims to provide a natural environment that inspires citizen engagement and is well used and appreciated, so that the health and well-being of such connection can be realised by Kent County's residents.

A.169 Tonbridge and Malling Borough Council, Climate Change Strategy 2020 – 2030 (2020) [\[See reference 317\]](#) – sets out how the Borough Council intends to address climate change along with the Strategy to achieve the aspiration of a carbon neutral borough by 2030.

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A.170 Kent County Council, Kent and Medway Energy and Low Emissions Strategy Implementation Plan 2020-2023 (2020) [\[See reference 318\]](#) – sets out the response to the UK climate emergency and promotes clean and resilient economic recovery that eliminates poor air quality, reduces fuel poverty and promotes the development of an affordable, clean and secure energy supply across Kent and Medway.

A.171 Kent County Council, Minerals and Waste Local Plan 2013-30 (2020) [\[See reference 319\]](#) – sets out the future minerals supply and waste manage in Kent until the year 2030.

A.172 Kent County Council, Minerals and Waste Local Plan 2013-30: Mineral Sites Plan [\[See reference 320\]](#) – details locations in Kent which are suitable for quarrying essential minerals needed to support growth and the economy.

A.173 Kent County Council, Active Travel Strategy 2018/2019 (2018) [\[See reference 321\]](#) – builds on the statutory transport, environment and road safety policies to promote walking and cycling as a regular means of travel. The Strategy sets out actions to ingrate active travel into planning, provide and maintain appropriate routes for active travel and support active travel within the community.

A.174 Kent County Council, Growth and Infrastructure Framework (2018) [\[See reference 322\]](#) – provides a strategic framework across a range of infrastructure for planned growth up to 2031. The Framework covers all forms of infrastructure to support the economic, environmental, and social needs of Kent and Medway and allows growth and infrastructure requirements to be considered over a spatial perspective.

A.175 Tonbridge and Malling Borough Council, Contaminated Land Inspection Strategy (2016) [\[See reference 323\]](#) – seeks provide a system for the identification and remediation of land where contamination is causing an unacceptable risk to human health or the wider environment because of the historic or current use and circumstances of the land. The Strategy highlights

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the principles of pollutant linkages and the three components of contaminant risk: contaminant, receptor and pathway.

A.176 Kent County Council, Kent Environment Strategy (2016) [\[See reference 324\]](#) – identifies the significant environmental challenges for Kent County currently and into the future.

A.177 Tonbridge and Malling Borough Council, Tonbridge and Malling Cycling Strategy 2014-2019 (2014) [\[See reference 325\]](#) – collates the relevant policies and related action plans to promote cycling and the development of appropriate cycling facilities throughout the borough.

A.178 Kent County Council, Kent Joint Health and Wellbeing Strategy (2014) [\[See reference 326\]](#) – seeks to improve health and wellbeing outcomes, deliver better coordinated care, and improve the public's experience of integrated health and social care services in the county.

A.179 Kent County Council, Kent Design Guide (no date) [\[See reference 327\]](#) – seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas.

A.180 Tonbridge and Malling Borough Council, Managing Development and the Environment 2010 [\[See reference 328\]](#) – forms part of the Local Development Framework for Tonbridge and Malling. The document aims to set out the policy direction to deliver the following aim: “to manage development so that environmental quality is maintained and enhanced whilst preserving a sense of place” as well as achieving the best balance between the built and natural environment.

A.181 Tonbridge and Malling Borough Council, Local Development Framework – Tonbridge Central Area Action Plan 2008 [\[See reference 329\]](#) – considers the access movement and connectivity, town centre profile, the role of water, design quality and different character areas in the central area of Tonbridge.

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A.182 Tonbridge and Malling Borough Council, Local Development Framework – Development Land Allocations 2008 [\[See reference 330\]](#) – forms part of the Local Development Framework for Tonbridge and Malling. The document lists, and specifically identifies on the Proposals Map, all development sites necessary to meet the needs of the area as identified in general terms in the Core Strategy.

A.183 Tonbridge and Malling Borough Council (various dates) Character Area Appraisals SPD [\[See reference 331\]](#) – supplements Policy SQ1 (Landscape and Townscape Protection and Enhancement) in the Managing Development and the Environment DPD, providing more detail on the character of the main built-up areas in the borough.

A.184 Tonbridge and Malling Borough Council Affordable Housing Supplementary Planning Document 2008 [\[See reference 332\]](#) – a supplementary planning document founded on the need for affordable housing in Tonbridge and Malling.

A.185 Tonbridge and Malling Borough Council, Local Development Framework – Core Strategy (Adopted 2007) [\[See reference 333\]](#) – sets the general locations for the delivery of housing and other strategic development requirements and broad areas of constraint for developments until 2021. This Strategy enables the social, economic, and environmental needs of the borough to be met in a sustainable way.

A.186 Tonbridge and Tunbridge Wells – Tonbridge Urban Transport Delivery Strategy 2007 [\[See reference 334\]](#) – sets the context for modelling work in support of the Tonbridge Central Area Action Plan. The Strategy seeks to identify ways to regenerate and improve connectivity within Tunbridge and Tunbridge Wells.

Surrounding development plans

A.187 The adopted Local Plans for the local authority areas surrounding Tonbridge and Malling which could potentially contribute to in-combination effects with the new Tonbridge and Malling Local Plan are outlined below.

A.188 Maidstone Borough Local Plan Review 2021-2038 (adopted March 2024) – The Local Plan Review sets out the framework for development in the borough until 2038. This includes provision of 19,669 dwellings and 543 pitches for Gypsies, Travellers and Travelling Showpeople. During the plan period, the Maidstone Borough Council also plans to provide for 119,250m² of employment floorspace, and a minimum of 14,360m² of retail, food and beverage floorspace, all of which can met through land allocations and the Maidstone Town Centre Broad Location in the Local Plan.

A.189 Tunbridge Wells' Development Plan comprises their Site Allocations Local Plan (adopted 2016), Core Strategy (adopted 2010) and saved Local Plan 2006 policies. The Core Strategy sets out the amount of development required across the borough to 2026 and is the central part of the Development Plan for the borough. During the Plan period, up to 6,000 additional homes must be provided in the borough. In addition, over the period to 2017, 26,500m² of additional (non-food) floorspace will also be provided. Tunbridge Wells Council has been working on a new Local Plan, and submitted this Local Plan in November 2021. It is still undergoing examination at this stage.

A.190 Sevenoaks District Council's Local Plan comprises their Core Strategy (adopted 2011) and Allocations and Development Management Plan (adopted 2015). The Core Strategy sets out the vision and policies for future development in the district over the period to 2026. This includes the provision of 165 dwellings (net addition) on average, annually, equivalent to 3,300 new dwellings over the period 2006 to 2026. The majority of new housing development will be focused in the urban areas of Sevenoaks and Swanley. The strategy will also deliver 86.1ha of employment land, predominately in Sevenoaks, Swanley and Edenbridge. Sevenoaks District Council's Allocations and Development Management Plan includes specific allocations for open space, residential,

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employment and mixed-use development across the district. With regard to new housing development, most of the new units will be concentrated in the Sevenoaks Urban Area, with approximately 163 units planned. In relation to employment sites, 69.6ha of existing employment sites will be retained, intensified and regenerated. The largest of these is at Station Road, Edenbridge, with a total of 18.8ha, followed by Vestry Road, Sevenoaks, with a total of 11.3ha. Sevenoaks District Council is committed to reviewing the Core Strategy over the next five years, and is currently working to provide evidence to support a new Local Plan to cover the period to 2040. They undertook a second Regulation 18 consultation in November 2023 to January 2024.

A.191 Gravesham Borough Council's Local Plan Core Strategy (2014) sets out the Council's long-term spatial vision for the borough and covers the period from April 2011 to March 2028. This includes the provision of at least 6,170 new dwellings and 186,490m² employment floorspace. The development will be distributed through the borough as follows: 3,890 new dwellings in addition the employment floorspace will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East, Gravesend Riverside East and North East Gravesend, Ebbsfleet and Gravesend Town Centre, and on land at the Coldharbour Road Key Site; and around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt. Gravesham Borough Council is committed to reviewing their Core Strategy, having consulted twice on their Site Allocations and Development Management Policies document at Regulation 18 stage.

A.192 The Medway Local Plan was adopted in 2003. The policies were due to expire in September 2007 and so Medway Council applied to the Secretary of State to save those policies which remained in conformity with national and sub-national planning policies. Medway Council is currently working on their new Local Plan, which will replace the 2003 one. The new Local Plan will guide the development and use of land in Medway from 2022 until 2041, providing a strategy for the provision of 28,500 homes over the Plan period, addressing climate change, and growing local businesses. The Council undertook a Regulation 18 consultation of the new Local Plan in July to September 2024.

Appendix B

Consultation comments received on the SA Scoping Report

Table B.1: Responses to representations received on the SA Scoping Report consulted upon between May and June 2025

Consultee	Comment	LUC's response
Historic England	Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Tonbridge and Malling Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/. This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.	Noted.
Natural England	Natural England welcomes the opportunity to engage with you authority at this scoping stage of the SA.	Noted.

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Consultee	Comment	LUC's response
	Relevant plans and programmes Natural England has not reviewed in detail the plans, policies and programmes listed in Appendix A of the report, but we advise that the list of types of plans which relate to the natural environment appear to be largely comprehensive. In particular, we welcome the inclusion of Natural England's Green Infrastructure Framework (2023) and Kent and Medway Local Nature Recovery Strategy (LNRS).	
	Baseline Information The recently updated Kent Downs Landscape Character Assessment (2020) provides a useful guide to landscape characters areas of the Kent Downs National Landscape to aid the SA in this section, it further assesses changes and trends since the last iteration in 1995.	Relevant information from the Kent Downs Landscape Character Assessment has been added to the baseline information.
	We note that section 3.62 – 3.68 of the report details the current state of open space provision within the borough, acknowledging that there exists a greenspace deficit. Natural England's Green Infrastructure (GI) Standards, part of the GI Framework, provides clarity on the requirements for GI including accessible natural greenspace requirements. It would be useful to state how the Borough is meeting these standards within the report. This will be aided by the GI Map, also part of the GI Framework.	Information on Natural England's GI standards has been added to the baseline information.
	Whilst we note that this chapter identifies the hierarchy of designated sites within the plan area, it does not reference the wider assets such as habitats and species of principal importance in England. Information pertaining to these assets should be available via the Kent and Medway Biological Records Centre and the evidence underpinning the Kent and Medway LNRS.	Text has been added to the baseline information on priority habitats within the borough. The site assessment criteria have also been updated to include habitats from the Priority Habitat Inventory. The Kent and Medway LNRS will be added to the SA once it is complete.

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Consultee	Comment	LUC's response
	Further to this, we advise that you consider the information in the attached Annex A for our advice on sources of local plan evidence on the natural environment.	
	Key sustainability issues Overall we welcome the overarching sustainability themes and issues identified within the report, as they cover most of the natural environment issues and areas within our remit. In particular, we welcome reference to the enhancement, extension and connection of natural assets and sites and the consideration of access to greenspace.	Noted.
	However, there are a further sustainability issues (constraints and/or objectives) within some themes that should be considered within the SA, or given added clarity. We include comments on these further areas for consideration with the SA Framework below. <i>Climate</i> Natural England advise that this section could be strengthened by acknowledging the opportunity to use Nature-based Solutions (NbS) for climate adaptation that can deliver multifunctional benefits. Natural England's Climate Change Adaptation Manual is a particularly useful resource in this regard.	Text has been added to the 'Likely evolution of the issue without the Local Plan' section of the SA under 'Climate' on the opportunity to use nature-based solutions for climate adaptation.
	<i>Landscape character</i> We welcome the inclusion of direct and indirect effects of development on protected landscapes within this section, but advise that it could be strengthened by the addition of poor quality design as a key sustainability issue, as well as the scale of development. As is recognised, the Kent Downs National Landscape and the High Weald	Issues relating to poor quality design and the scale of development have been added to the 'Key sustainability issues' section of the SA under 'Landscape character'.

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Consultee	Comment	LUC's response
	National Landscape are within the plan area, thus there is the potential for development to adversely affect their distinctive character and special qualities. We advise that good quality design plays an important role in mitigating such adverse effects to both landscape character and visual impacts.	
	<i>Ecology and biodiversity</i> Whilst we welcome acknowledgement of the potential impact of development on natural assets as a sustainability issue, development also offers the opportunity to support landscape scale nature recovery. We advise that the report acknowledges this opportunity as a key sustainability issue.	Text has been added to the 'Likely evolution of the issue without the Local Plan' section of the SA under 'Ecology and biodiversity' (now referred to as 'Ecology, biodiversity and geodiversity') on the opportunity that development presents to support landscape scale nature recovery.
	<i>Air quality</i> Whilst we welcome the inclusion of air quality as a key sustainability issue, it is not clear if the report acknowledges the importance of air quality for not only human health but also the health and biodiversity of our flora and fauna. We advise that this connection is made explicit in this section.	Text has been added to the 'Key sustainability issues' section of the SA under 'Air quality' and 'Ecology and biodiversity' (now referred to as 'Ecology, biodiversity and geodiversity') on the effects poor air quality can have on flora and fauna.
	<i>Geodiversity</i> Whilst the report acknowledges geodiversity in the baseline information and subsequent SA Framework, it is absent from the key sustainability issues. We advise that the need to protect and enhance geodiversity should be considered a key sustainability issue.	The section 'Ecology and biodiversity' has been renamed 'Ecology, biodiversity and geodiversity', with text added on the importance of protecting and enhancing geodiversity.
	Sustainability Appraisal framework The following key issues should be given further consideration with the SA Framework:	The appraisal of the Local Plan options, policies and site allocations against the SA objectives contained within the SA framework will be guided in part by the appraisal questions (i.e. the sub-objectives)

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Consultee	Comment	LUC's response
	<i>SA objective 1: To improve human health and well-being</i> Natural England welcomes the commitment to equitable access to green space, and the connection this objective makes between human health, connection to nature, and green infrastructure (GI). However, we advise that this could be strengthened by committing to meeting Natural England's GI Standards. These standards define what good GI 'looks like', and aim to enable equitable provision of good GI.	accompanying each SA objective. These questions are high-level and non-exhaustive, and adding a sub-objective that commits Tonbridge and Malling Borough Council to meet Natural England's GI Standards would be too prescriptive. The extent to which the Local Plan requires new developments to meet Natural England's GI Standards is for the Council to consider.
	<i>SA objective 2: To improve equality and access to community facilities and services</i> Active Travel: Whilst we welcome the commitment "To encourage walking, cycling and the use of public transport", we advise that this could be strengthened by making an explicit commitment to the provision, protection and enhancement of active travel routes. Public Rights of Way: The report identifies that the borough has strong Public Rights of Way (PRoW) networks, which are essential to enable active travel and access to nature. We therefore advise that could be strengthened by including the following sub-objective, and a related indicator: "To protect and enhance existing public rights of way networks"	The following sub-objective has been added to the SA framework under SA objective 2: ■ To provide, protect and enhance active travel routes, including Public Rights of Way networks.
	<i>SA objective 5: To protect and enhance biodiversity and geodiversity</i> Local Nature Recovery Strategy: Whilst we welcome and support the sub-objective "To protect, enhance and expand ecological networks and their interconnectivity", we would like to see this objective have an explicit ambition to support the development and implementation of the Kent and Medway LNRS. As the report notes in section 2.24, the	The following sub-objective has been added to the SA framework under SA objective 5: ■ To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy.

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Consultee	Comment	LUC's response
	LNRS is key to delivering a strategic approach to maintaining and enhancing ecological networks.	
	Protected species: Whilst we welcome the commitment of the SA to "To protect, conserve and enhance priority species and habitats", it should be noted that not all protected species will be priority species. Thus we advise this sub-objective is amended to consider all protected species.	The sub-objective has been amended as follows: ■ To protect, conserve and enhance <u>protected species, including</u> priority species, and habitats, <u>=</u> including those of conservation importance that contribute to reversing the trend of ecological decline.
	<i>SA objective 6: To protect and enhance the borough's landscape and townscape character and quality</i> Natural England welcome this objective and have no comments to make.	Support noted.
	<i>SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination</i> Open mosaic habitat: Whilst Natural England overall support the objective "To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible", it should be noted that some previously developed (brownfield) land can contain Open Mosaic Habitats on Previously Developed Land, a priority habitat which can be extremely diverse. We therefore advise that this sub-objective is amended, or a further sub-objective added, that acknowledges the ecological importance of these habitats.	Biodiversity is covered by SA objective 5: To protect and enhance biodiversity and geodiversity. One of the sub-objectives has been amended as follows: ■ To protect and enhance habitats and wildlife corridors, <u>including on brownfield land</u>.

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Consultee	Comment	LUC's response
	Best and Most Versatile (BMV) Agricultural Land: We welcome the commitment to protecting BMV land in this section.	Support noted.
	<i>SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation</i> Nature-based Solutions: We welcome the inclusion of a sub-objective that encourages the use of SuDS and other nature-based solutions for the purposes of climate change adaptation.	Support noted.
	<i>SA objective 12: To reduce levels of and exposure to noise, light and air pollution</i> Impacts to nature: As discussed above, excess noise, light and air pollution can not only impact human health, but biodiversity and the health of the natural environment. These factors are also key elements of the special qualities of the two protected landscapes. We therefore advise that 'Biodiversity', 'Flora and Fauna', and 'Landscape' are added to the SEA topics column.	The SEA topics mentioned have been added.
	Site assessment criteria <i>SA objective 1: To improve human health and well-being</i> Access to greenspace: Natural England note that this section does not include an indicator related to greenspace, connecting people with nature, or GI, despite the commitment in the SA Framework. Natural England's GI Standards (part of the GI Framework) encourage local authorities to adopt the following local Greenspace Close to Home Access targets: <i>EITHER a Doorstep OR Local Accessible Greenspace:</i>	Access to open space is covered under SA objective 1. The distance thresholds used were developed by LUC, based on research undertaken by the Chartered Institution of Highways and Transportation.

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Consultee	Comment	LUC's response
	■ A Doorstep Accessible Greenspace of at least 0.5ha within 200 metres (under 5 mins walk), ■ A Local Accessible Natural Greenspace of at least 2ha within 300 metres (5 mins walk from home) <i>AND a Neighbourhood Accessible Natural Greenspace:</i> ■ A medium sized Neighbourhood Accessible Natural Greenspace (10ha) within 1km (15 minutes' walk from home).	
	<i>SA objective 5: To protect and enhance biodiversity and geodiversity</i> Natural England welcome the inclusion of an indicator to consider impacts on designated sites. However, we advise that it would more appropriate to utilise the Impact Risk Zones for designated sites instead of a 250m buffer as a way of assessing whether impacts will be negative. These zones are site and features specific, and indicate the types of development proposal which could potentially have adverse impacts.	Engagement with Natural England's National Planning Delivery Team in July 2024 has led to the conclusion that the SSSI IRZs dataset is not appropriate for use in SA. The dataset has been designed for use at the planning application stage and on a site-by-site basis, rather than for strategic-level assessment such as SA. In any case, recent updates to the dataset have rendered it unsuitable for use in GIS analysis as it no longer includes data attributes in the shapefiles (instead loading a webpage where relevant criteria are listed).
	<i>SA objective 6: To protect and enhance the borough's landscape and townscape character and quality</i> Natural England do not agree that a 500m buffer for negative impacts to protected landscapes is appropriate. Impact to National Landscapes, in particular the Kent Downs with distant views to and from the scarp slope as one of the special qualities, occur over significantly greater distances.	This distance threshold has been used in other SAs for Local Plans elsewhere, which have been sound and adopted. However, in recognition of Natural England's comments, the criteria have been amended such that sites within 1km could have a significant negative effect. This is uncertain because effects cannot be determined with any certainty based on distance alone and effects will depend on factors such as visibility and

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Consultee	Comment	LUC's response
		viewpoints and the specific design and layout of new development. Therefore, while distances may vary depending on the characteristics of a protected landscape, for the purposes of the SA a set distance has been used.
Environment Agency	The baseline ecological information in the report should also include priority habitats including rivers and streams, not just designated sites. This is because to achieve a net gain for biodiversity, there should be a wider consideration of where hot spots for biodiversity are.	Reference to priority habitats has been added to the baseline information. Consideration will be given to priority habitats in the site assessment work.
	The proximity to features of importance for biodiversity should be taken into consideration when forming Local plan policy and site allocations.	This comment relates more to the Local Plan than the SA.

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- 91** This figure includes the percentage of the working population employed as a manager, director, senior role, professional occupation or associate professional occupation. However, the figure for 'Associate professional and technical occupations' is too small to provide reliable estimates, which is why the table only includes figures 'Managers, directors, and senior officials' (19.7%) and 'Professional occupations' (36.6%), resulting in a total that adds up to less than 63%.
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