

Tonbridge & Malling Local Plan

Habitats Regulations Assessment

Tonbridge & Malling Borough Council

September 2025

Quality information

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1. Introduction

Background to the Project

- 1.1 AECOM was appointed to produce a Habitats Regulations Assessment (HRA) of the potential effects of the Tonbridge & Malling Local Plan (T&MLP) on the National Site Network of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. For simplicity these sites are referred to as Habitats sites throughout this report. The objectives of the assessment are to:
 - Identify any aspects of the Local Plan that would cause an adverse effect on the integrity of Habitats sites either alone or in combination with other plans and projects; and
 - To advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.
- 1.2 The Local Plan sets out a spatial vision, objectives, levels and types of growth and strategic and development management policies. It identifies infrastructure requirements and allocates sites for development in the period up to 2042 to meet the growth needs of Tonbridge & Malling. AECOM has been appointed to undertake the report to inform the Habitats Regulations Assessment (HRA) of the emerging Local Plan.
- 1.3 The Local Plan is a strategy document that provides a positive vision for the future of Tonbridge & Malling borough. It includes a framework for addressing assessed development needs and environmental and social priorities to make sure future development provides the right kind of jobs, homes and infrastructure in the best and most sustainable locations.
- 1.4 The Local Plan covers the Borough up to 2042 and applies to the administrative boundary of Tonbridge & Malling Borough Council.
- 1.5 Tonbridge & Malling Borough Council is a Competent Authority as defined in Regulation 7 of the Conservation of Habitats and Species Regulations 2017 (as amended). Regulation 105 states that ‘A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which... is likely to have a significant effect on a European site [a Special Area of Conservation, Special Protection Area or, as a matter of Government policy, a Ramsar site] or a European offshore marine site (either alone or in combination with other plans or projects) ...must make an appropriate assessment of the implications of the plan or project for that site in view of that site’s conservation objectives’. This entire process is called Habitats Regulations Assessment (HRA).

Assessment ‘in combination’

- 1.6 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the Habitats site(s) in question. In practice, ‘in combination assessment’ is of greatest importance when the policy would otherwise be screened out because the individual contribution is not significant. When undertaking in combination assessment for specific development sites, it is important to avoid double-counting since many housing and employment projects that deliver growth in Tonbridge & Malling will usually already be allocated in the Local Plan for the borough. In these instances, the development of a planning application essentially provides further detail on those aspects of Local Plan growth rather than presenting a new project.
- 1.7 Similarly, where growth is being delivered in surrounding authorities this is captured in the ‘in combination’ assessment through consideration of the relevant Local Plan that sets out the total amount of growth that will be delivered across that authority during its plan period, based on currently adopted Local Plans.

Legislation

- 1.8 The United Kingdom (UK) left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). The Withdrawal Act retains the

body of existing EU-derived law within our domestic law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for HRA continues post-Brexit.

- 1.9 The HRA process applies the ‘Precautionary Principle’¹ to Habitats sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the Habitats site(s) in question. Plans and projects with predicted adverse impacts on Habitats sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Over-riding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.10 The need for Appropriate Assessment (AA, Plate 1) is set out in the Conservation of Habitats and Species Regulations 2017 (as amended).

Conservation of Habitats and Species Regulations 2017 (as amended)

“A competent authority, before deciding to ... give any consent, permission or other authorisation for a plan or project which... is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects) ... must make an appropriate assessment of the implications for that site in view of that site’s conservation objectives ... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site ...”

Plate 1: The Legislative basis for Appropriate Assessment

- 1.11 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’.
- 1.12 In spring 2018 the ‘Sweetman’ European Court of Justice ruling² clarified that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

2. Methodology

Introduction

- 2.1 This section sets out the approach and methodology for undertaking the Habitats Regulations Assessment (HRA).

A Proportionate Assessment

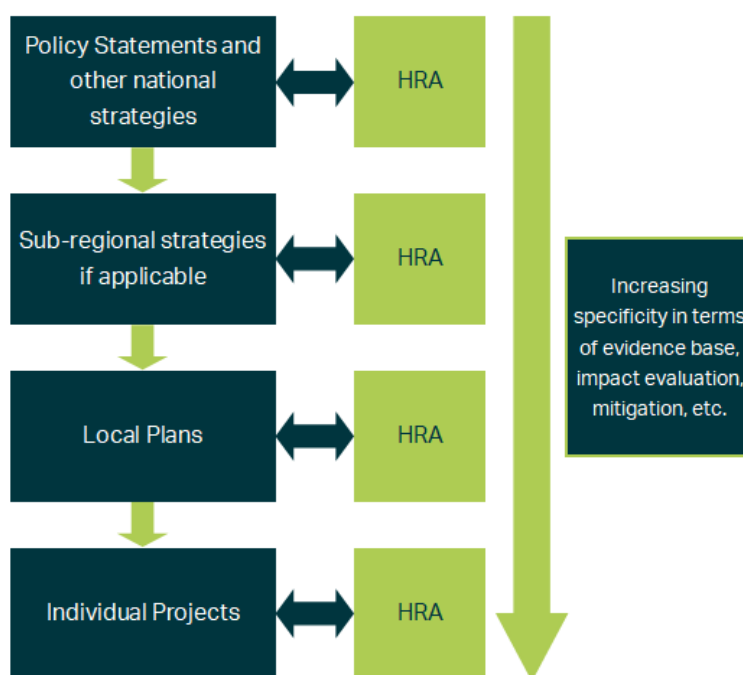
- 2.2 Project-related HRA often requires bespoke survey work and novel data generation in order to accurately determine the significance of effects. In other words, to look beyond the risk of an effect to a justified prediction of the actual likely effect and to the development of avoidance or mitigation measures.

¹ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: “When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis”.

² People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

- 2.3 However, the draft MHCLG guidance³ (described in greater detail later in this chapter) makes it clear that when implementing HRA of land-use plans, the Appropriate Assessment (AA) should be undertaken at a level of detail that is appropriate and proportional to the level of detail provided within the plan itself.
- 2.4 “The comprehensiveness of the [Appropriate] assessment work undertaken should be proportionate to the geographical scope of the option and the nature and extent of any effects identified. An AA need not be done in any more detail, or using more resources, than is useful for its purpose. It would be inappropriate and impracticable to assess the effects [of a strategic land use plan] in the degree of detail that would normally be required for the Environmental Impact Assessment (EIA) of a project.”
- 2.5 More recently, the Court of Appeal⁴ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be “*achieved in practice*” then this would suffice to meet the requirements of the Habitat Regulations. This ruling has since been applied to a planning permission (rather than a Plan document)⁵. In this case the High Court ruled that for “*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations*”.
- 2.6 In other words, there is a tacit acceptance that AA can be tiered and that all impacts are not necessarily appropriate for consideration to the same degree of detail at all tiers as illustrated in **Plate 2**.

Plate 2: Tiering in HRA of Land Use Plans



- 2.7 At the same time, it is necessary to have confidence that sites allocated in a Local Plan have a reasonable prospect of being deliverable without fundamental Habitats Regulations Assessment issues.
- 2.8 The most robust and defensible approach to the absence of fine grain detail at this level is to make use of the precautionary principle. In other words, the plan is never given the benefit of the doubt (within the limits of reasonableness); it must be assumed that a policy/measure is likely to have an impact leading to a significant adverse effect upon an internationally designated site unless it can be clearly established otherwise.

³ MHCLG (2006) Planning for the Protection of Habitats sites, Consultation Paper

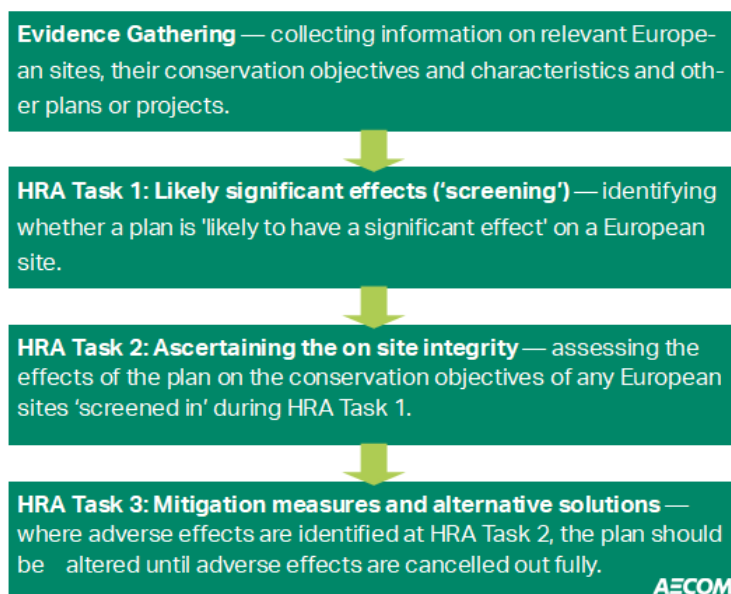
⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

The Process of HRA

- 2.9 Central government have released general guidance on appropriate assessment⁶. **Plate 3** outlines the stages of HRA according to guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations, and any relevant changes to the plan until no likely significant effects remain.

Plate 3: Four-Stage Approach to Habitats Regulations Assessment



- 2.10 The following process has been adopted for carrying out the subsequent stages of the HRA.

Task One: Test of Likely Significant Effects

- 2.11 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a LSEs screening - essentially a brief, high-level assessment to decide whether the full subsequent stage known as AA is required. The essential question is:

"Is the plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"

- 2.12 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in significant adverse effects upon Habitats sites, usually because there is no mechanism for an adverse interaction.
- 2.13 The LSEs screening is based on identification of the impact source, its pathway to receptors and an appraisal of the specific Habitats site receptors. These are normally designated features but also include habitats and species fundamental for designated features to achieve favourable conservation status (notably functionally linked habitats outside the Habitats site boundary).
- 2.14 In the Waddenzee case⁷, the European Court of Justice ruled on the interpretation of Article 6(3) of the Habitats Directive, including that:
- An effect should be considered 'likely', "if it cannot be excluded, on the basis of objective information, that it will have a significant effect on the site" (para 44);
 - An effect should be considered 'significant', "if it undermines the conservation objectives" (para 48); and
 - Where a plan or project has an effect on a site "but is not likely to undermine its conservation objectives, it cannot be considered likely to have a significant effect on the site concerned" (para 47).

⁶ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

⁷ Case C-127/02

- 2.15 The LSEs screening consists of two parts: Firstly, it should determine whether there are any policies that could result in negative impact pathways and secondly it establishes whether there are any Habitats sites that might be affected. It identifies Habitats sites that are most likely to be impacted by the Plan and the impact pathways that are most likely to require consideration.
- 2.16 It is important to note that LSEs screening must generally follow the precautionary principle as its main purpose is to determine whether the subsequent stage of AA (i.e., a more detailed investigation) is required.

The Geographic Scope

- 2.17 There is no standard criteria that dictates the ultimate physical scope of an HRA of a Plan in all circumstances. Therefore, in considering the physical scope of the assessment AECOM was guided primarily by the identified impact pathways rather than by arbitrary “zones”, i.e. a source-pathway-receptor approach. Current guidance suggests that the following Habitats sites be included in the scope of assessment:
- All sites within the borough; and
 - Other sites shown to be linked to development within the plan area through a known “pathway” (discussed below).
- 2.18 Briefly defined, impact pathways are routes by which a change in activity within the plan area can lead to an effect upon a Habitats site. In terms of the second category of Habitats site listed above, Department for Leveling Up, Housing and Communities (DLUHC) (formerly Ministry of Housing, Communities and Local Government (MHCLG)) guidance states that the AA should be “*proportionate to the geographical scope of the [plan policy]*” and that “*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*” (MHCLG, 2006, p.6).
- 2.19 Full details of all designated Habitats sites discussed in this document can be found in **Chapter 3** specifying their qualifying features, conservation objectives and pressures and threats to integrity taken from the Site Improvement Plan for each site, although it is noted that the Conservation Objectives and Supplementary Advice on Conservation Objectives take precedence over Site Improvement Plans as they are generally more recent. **Table 1** below lists all those designated Habitats sites included in this HRA.

Table 1. Physical Scope of the HRA - Habitats sites of Interest

Habitats site	Location
North Downs Woodlands SAC	Within the borough
Peters Pit SAC	Within the borough
Medway Estuary & Marshes SPA/Ramsar site	6.2km north of the borough
Queendown Warren SAC	6.4km north-east of the borough
Thames Estuary & Marshes SPA/Ramsar site	8km north-west of the borough
Ashdown Forest SAC/SPA	13.3km south-west of the borough

Confirming Other Plans and Projects That May Act ‘In Combination’

- 2.20 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the designated Habitats site(s) in question.
- 2.21 In considering the potential for combined regional housing development to impact on Habitats sites the primary consideration is the impact of visitor numbers – i.e., recreational pressure and urbanisation.

- 2.22 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e., to ensure that those projects or plans (which in themselves have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential. The overall approach is to exclude the risk of there being unassessed likely significant effects in accordance with the precautionary principle. This was first established in the seminal Waddenzee⁸ case.
- 2.23 For the purposes of this HRA, we have determined that the key other plans and projects with a potential for in-combination effects are:
- Local Plan documents for relevant authorities surrounding (though not necessarily bordering) the borough:
 - Medway Local Plan
 - Maidstone Local Plan
 - Tunbridge Wells Local Plan
 - Sevenoaks Local Plan
 - Gravesham Local Plan
 - Dartford Local Plan
 - Transport Plan documents for Kent:
 - Kent Local Transport Plan
 - Minerals and Waste Plan documents for authorities within Kent:
 - Kent Minerals and Waste Local Plan
 - Water Resource Management Plans for North Kent:
 - Thames Water – Water Resource Management Plan
 - Southern Water – Water Resource Management Plan
 - South East Water – Water Resource Management Plan
 - Southern Water – Drought Plan
 - South East Water – Drought Plan
 - Southern Water – Drainage and Wastewater Management Plan
 - Relevant individual projects not covered by Local Plans or similar:
 - Lower Thames Crossing: [Lower Thames Crossing | National Infrastructure Planning \(planninginspectorate.gov.uk\)](https://www.planninginspectorate.gov.uk/lower-thames-crossing/). In particular this has been factored into the transport assessments which have underpinned the air quality modelling reported in this HRA.
- 2.24 It should be noted that, while the broad potential impacts of these plans will be considered, this document does not carry out a full HRA of these Plans and projects. Instead, it draws upon existing HRAs that have been carried out on the Plans and projects.

⁸ Waddenzee case (Case C-127/02, [2004] ECR-I 7405)

3. Background to Habitats Sites

North Downs Woodlands SAC

Reason for Designation⁹

3.1 The site is designated as a **SAC** for its:

- *Taxus baccata* woods of the British Isles. (Yew-dominated woodland)
- *Asperulo-Fagetum* beech forests. (Beech forests on neutral to rich soils)
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)

Conservation Objectives¹⁰

3.2 “With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

3.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats, and
- The supporting processes on which qualifying natural habitats rely”

Historic Trends and Current Pressures¹¹

- Public access/ disturbance
- Forestry and woodland management
- Invasive species
- Air pollution: impact of atmospheric nitrogen deposition

Peters Pit SAC

Qualifying Features¹²

3.4 The site is designated for its population of great crested newt.

Conservation Objectives¹³

3.1 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ listed below), and subject to natural change;

3.2 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

⁹ <http://publications.naturalengland.org.uk/file/6520020842577920> [accessed 21/06/2023]

¹⁰ <http://publications.naturalengland.org.uk/file/5579173532008448> [accessed 21/06/2023]

<http://publications.naturalengland.org.uk/file/5280120969625600> [accessed 21/06/2023]

¹¹ <http://publications.naturalengland.org.uk/publication/6363401429188608> [accessed 21/06/2023]

¹² Available at: [Peter's Pit - Special Areas of Conservation \(jncc.gov.uk\)](https://jncc.gov.uk/peter-pit-special-areas-of-conservation) [Accessed on the 21/06/2023]

¹³ Available at: [European Site Conservation Objectives for Peter's Pit SAC - UK0030237 \(naturalengland.org.uk\)](https://naturalengland.org.uk/european-site-conservation-objectives-for-peter-pit-sac-uk0030237) [Accessed on the 21/06/2023]

- The extent and distribution of qualifying natural habitats
- The structure and function (including typical species) of qualifying natural habitats
- The supporting processes on which qualifying natural habitats rely

Historic Trends and Current Pressure¹⁴

- 3.3 No threats and pressures to the site integrity of the Peter's Pit SAC have been identified in Natural England's Site Improvement Plan and the Supplementary Advice on the Conservation Objectives.¹⁶

Queendown Warren SAC

Reason for Designation¹⁵

- 3.4 The site is designated as a **SAC** for its:
- Dry grasslands and scrublands on chalk or limestone, including important orchid sites.

Conservation Objectives¹⁶

- 3.5 *"With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;*
- 3.6 *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;*
- The extent and distribution of qualifying natural habitats
 - The structure and function (including typical species) of qualifying natural habitats, and
 - The supporting processes on which qualifying natural habitats rely"

Historic Trends and Current Pressures¹⁷

- Species decline
- Habitat fragmentation
- Air quality: risk of atmospheric nitrogen deposition

Medway Estuary & Marshes SPA/Ramsar site

Reason for Designation

- 3.7 The site is designated as an **SPA**¹⁸ for supporting bird populations of European importance for the breeding species of:
- Avocet *Recurvirostra avosetta*
 - Little tern *Sterna albifrons*
 - Common tern *Sterna hirundo*
- 3.8 The site is designated as an **SPA** for supporting bird populations of European importance for the over-wintering species of:

¹⁴ Available at: [Site Improvement Plan: Peters Pit - SIP170 \(naturalengland.org.uk\)](https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012833.pdf) [Accessed on the 21/06/2023]

¹⁵ <https://jncc.gov.uk/jncc-assets/SAC-N2K/UK0012833.pdf> [21/06/2023]

¹⁶ <http://publications.naturalengland.org.uk/file/4860443613200384> [21/06/2023]

¹⁷ <http://publications.naturalengland.org.uk/file/4724631642832896> [21/06/2023]

¹⁸ <http://publications.naturalengland.org.uk/publication/4943746697265152> [accessed 21/06/2023]

¹⁹ <http://publications.naturalengland.org.uk/file/5039453273849856> [accessed 21/06/2023]

- Tundra swan *Cygnus columbianus bewickii*
 - Avocet *Recurvirostra avosetta*
- 3.9 The Ramsar information sheet states that Medway Estuary and Marshes site comprises, “A complex of brackish and freshwater, floodplain grazing marsh with ditches, and intertidal saltmarsh and mudflat. These habitats together support internationally important numbers of wintering waterfowl. Rare wetland birds breed in important numbers. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants and invertebrates”. The **Ramsar** site is designated for the following criteria¹⁹:
- 3.10 Ramsar criterion 2: The site supports nationally scarce plants and at least seven British Red data book invertebrates.
- 3.11 Ramsar criterion 5: Assemblages of international importance: Species with peak counts in winter: 47637 waterfowl (5 year peak mean 1998/99-2002/2003).
- 3.12 Ramsar criterion 6: – Species/populations occurring at levels of international importance. The site has bird species occurring in internationally important numbers: Redshank, grey plover (spring/autumn), dark-bellied brent goose, shelduck, pintail, red knot, ringed plover, dunlin (winter)

Conservation Objectives of the SPA²⁰

- 3.13 “With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’ listed below), and subject to natural change;
- 3.14 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.”

Historic Trends and Current Pressures²¹

- Coastal squeeze
- Public access/ disturbance
- Invasive species
- Changes in species distribution
- Fisheries: commercial marine and estuarine
- Vehicles: illicit
- Air pollution: risk of atmospheric nitrogen deposition

Thames Estuary & Marshes SPA/Ramsar site

Reason for designation

- 3.15 The site is designated as an SPA for supporting bird populations of European importance for the breeding species of:
- *Circus cyaneus*; Hen harrier (Non-breeding)
 - *Recurvirostra avosetta*; Pied avocet (Non-breeding)

¹⁹ <https://rsis.ramsar.org/RISapp/files/RISrep/GB645RIS.pdf> [accessed 21/06/2023]

²⁰ <http://publications.naturalengland.org.uk/publication/6672791487119360> [accessed 21/06/2023]

²¹ <http://publications.naturalengland.org.uk/file/5760073666134016> [accessed 21/06/2023]

- *Charadrius hiaticula*; Ringed plover (Non-breeding)
- *Pluvialis squatarola*; Grey plover (Non-breeding)
- *Calidris canutus*; Red knot (Non-breeding)
- *Calidris alpina alpina*; Dunlin (Non-breeding)
- *Limosa limosa islandica*; Black-tailed godwit (Non-breeding)
- *Tringa totanus*; Common redshank (Non-breeding)
- Waterbird assemblage

3.16 The site is designated as a Ramsar site for:

Thames Estuary & Marshes Ramsar site

- Ramsar Criterion 2 - The site supports more than 20 British Red Data Book invertebrates and populations of the GB Red Book endangered least lettuce (*Lactuca saligna*), as well as the vulnerable slender hare's-ear (*Bupleurum tenuissimum*), divided sedge (*Carex divisa*), sea barley (*Hordeum marinum*), Borrer's saltmarsh-grass (*Puccinellia fasciculata*), and dwarf eelgrass (*Zostera noltei*)
- Ramsar Criterion 5 - The site supports assemblages of international importance with species with peak counts in winter
- Ramsar Criterion 6 - Species/populations occurring at levels of international importance: black-tailed godwit, dunlin

Conservation Objectives

3.17 "With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;

3.18 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site."

Historic Trends and Current Pressures

- Coastal Squeeze
- Public access/disturbance
- Invasive species
- Changes in species distribution
- Fisheries: Commercial marine and estuarine
- Vehicles: illicit
- Air pollution

Ashdown Forest SAC/SPA

Reason for designation

3.19 The site is designated as an SAC for:

- Annex I habitats that are a primary reason for selection of this site
 - Northern Atlantic wet heaths with *Erica tetralix*
 - European dry heaths
 - Annex II species present as a qualifying feature, but not a primary reason for site selection
 - Great crested newt *Triturus cristatus*
- 3.20 The site is designated as an SPA for supporting nationally important breeding populations of two Annex 1 species:
- *Caprimulgus europaeus*; Nightjar
 - *Sylvia undata*; Dartford warbler

Conservation Objectives

- 3.21 The conservation objectives for the SAC are *“With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’ listed below), and subject to natural change;*
- 3.22 *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.”
- 3.23 The conservation objectives for the SPA are *“With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the ‘Qualifying Features’ listed below), and subject to natural change;*
- 3.24 *Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;*
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.”

Historic Trends and Current Pressures

- Change in land management
- Air pollution: impact of atmospheric nitrogen deposition
- Public access/disturbance
- Hydrological changes

4. Test of Likely Significant Effects

Introduction

- 4.1 When seeking to identify relevant Habitats sites, consideration has been given primarily to identified impact pathways and the source-pathway-receptor approach, rather than adopting purely a 'zones'-based approach. The source-pathway-receptor approach is a standard tool in environmental assessment. For an effect to occur, all three elements of this mechanism must be in place, whereas the absence of one or more of the elements means there is no potential for an effect. Furthermore, even where an impact may occur, it may not result in significant effects (i.e., those which undermine the Conservation Objectives of a Habitats site).
- 4.2 Based upon Natural England's Site Improvement Plans (SIPs), supplementary advice on conservation objectives, and professional judgement, the following impact pathways require consideration regarding development proposals within the T&MLP area and the identified Habitats sites:

Table 2 Potential Impact Pathways that Could Link the Local Plan to an Internationally Designated Site

Internationally Designated Site	Potential Linking Impact Pathways
North Downs Woodlands SAC	- Air quality: impact of ammonia, NOx and the resulting atmospheric nitrogen deposition - Public access (recreation) / disturbance including adventure sports, soil compaction/loss, dog fouling/eutrophication, introduction of invasive species such as holly etc.
Peter's Pit SAC	- Loss of, and disturbance to, functionally linked habitat (including inappropriate land management) - Water quality
Queendown Warren SAC	- Air quality: impact of ammonia, NOx and the resulting atmospheric nitrogen deposition - Public access (recreation) / disturbance, soil compaction/loss, dog fouling/eutrophication
Medway Estuary & Marshes SPA/Ramsar site	- Water quality and water quantity: impact of nutrient deposition, abstraction and pollution²⁸ - Public access / disturbance
Thames Estuary & Marshes SPA/Ramsar site	- Water quality and water quantity: impact of nutrient deposition, abstraction and pollution²⁸ - Public access / disturbance
Ashdown Forest SAC/SPA	Air quality: impact of ammonia, NOx and the resulting atmospheric nitrogen deposition

- 4.3 While the Habitats sites identified above are vulnerable to other impacts, those identified in the table are most likely to be associated with growth in Tonbridge & Malling Borough.

Recreational Pressure

- 4.4 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels²², and impacts on protected Habitats sites^{23 24}. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats sites. Different Habitats sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of

²² Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/juz019>

²³ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

²⁴ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

disturbance due to new residents²⁵. Housing developments within the Local Plan will need to strongly consider their impact on Habitats sites.

Trampling Damage, Nutrient Enrichment and Wildfires

4.5 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage. This dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney²⁶ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al²⁷ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology (structure) was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes (plants with buds at or near the soil surface) and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year. These were therefore considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole²⁸ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
- Cole & Spildie²⁹ experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.

4.6 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews³⁰). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature

²⁵ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

²⁶ Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

²⁷ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

²⁸ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

²⁹ Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

³⁰ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually³¹. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components³². Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

Bird Disturbance

- 4.7 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting. Human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death³³.
- 4.8 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding³⁴. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which must sustain a greater number of birds³⁵. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{36 37}.
- 4.9 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking³⁸. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers³⁹. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

Bird Disturbance Study

- 4.10 A study was undertaken in 2010/2011 by Footprint Ecology⁴⁰, who looked at bird disturbance in North Kent. The study focused on recreational disturbance to wintering waterfowl on intertidal habitats and focused on part of the North Kent shoreline, stretching between Gravesend and Whitstable; encompassing three SPAs: the Thames Estuary and Marshes SPA, the Medway Estuary and Marshes SPA and the Swale SPA. The key findings of the study are as follows:

³¹ Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* 11:16-19.

³² Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

³³ Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

³⁴ Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279.

³⁵ Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72.

³⁶ Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi.org/10.1371/journal.pone.0072984>.

³⁷ Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* 114: 219-230.

³⁸ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* 3: 14pp.

³⁹ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* 29: 124-132.

⁴⁰ D. Liley & H. Fearnley (Footprint Ecology), 2011. Bird Disturbance Study North Kent.

- 4.11 From 1,400 events (records of visitors in the bird survey areas) occurring within 200m of the birds, 3,248 species specific observations were noted of which:
- 74% resulted in no response.
 - 13% resulted in a major flight.
 - 5% resulted in a short flight.
 - 5% resulted in a short walk.
 - 3% resulted in an alert.
- 4.12 Dog walking accounted for 55% of all major flight observations with a further 15% attributed to walkers without dogs. After controlling for distance, major flights were more likely to occur when activities took place on the intertidal zone (compared to events on the water or events on the shore), when dogs were present, and the probability of major flight increased with the number of dogs present within a group.
- 4.13 There were significant differences between species with curlew *Numenius arquata* the species with the highest probability of major flight and teal and black-tailed godwit *Limosa limosa* the lowest.
- 4.14 Tide state was also significant with major flights more likely at high tide, after controlling for distance. There was also a significant interaction between distance and tide, indicating that the way in which birds responded varied according to tide.

North Kent Visitor Survey

- 4.15 A visitor survey was undertaken at the same time as the aforementioned bird survey by Footprint Ecology⁴¹. The key findings of the survey are as follows:
- 4.16 542 groups of visitors were interviewed representing information from 930 people with 502 dogs.
- 65% (345) interviewed groups were accompanied by at least one dog.
 - 96% (521) interviewed groups were local residents who made their visit from home.
 - 70% of visitors who arrive by foot made their visits either daily or most days (in comparison to 31% who arrive by car).
 - 63% of visitors travelled to their visit location by car or van, 34% of visitors arrived by foot, 3% arrived by bicycle and 2% by public transport.
 - 50% of visitors who arrived by car lived within 4.2km of their visit location.
 - 23% of visitors stated they walked off the paths and onto the mudflats or the open beach. Of the 23% of visitors whose routes took them onto the mudflats 65% were accompanied by at least one dog.
- 4.17 The Bird Wise North Kent Mitigation Strategy⁴² applies a 6km recreational catchment to the Thames Estuary & Marshes SPA, Medway Estuary SPA and The Swale SPA. Since Tonbridge & Malling is beyond that distance from all three Habitats sites and Queendown Warren SAC is located over 8km from the nearest allocated site, recreational pressure is only likely to require consideration for North Downs Woodlands SAC, which lies partially within the Borough.

Air Quality

Atmospheric Pollution

- 4.18 The main pollutants of concern for Habitats sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂), and these are summarised in Table 4. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges⁴³. NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). NO_x and NH₃ both contribute to the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems.

⁴¹ Fearnley, H. & Liley, D. (2011). North Kent Visitor Survey Results. Footprint Ecology.

⁴² <https://northkent.birdwise.org.uk/wp-content/uploads/2018/02/Mitigation-Strategy.pdf> [accessed 07/01/2021]

⁴³ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{44 45}.

Table 3: Main sources and effects of air pollutants on habitats and species⁴⁶

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.	Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO₂ background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.	Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.
Ammonia (NH ₃)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. It is also emitted from some vehicles. Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³.

⁴⁴ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

⁴⁵ Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

⁴⁶ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

Pollutant	Source	Effects on habitats and species
	In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.	Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO _x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving NO _x , volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O ₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

- 4.19 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁴⁷. As such, it can be excluded that material increases in SO₂ emissions will not be associated with the Local Plan. In contrast, NO_x emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NO_x footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁴⁸. Emissions of ammonia can also be linked to traffic although vehicles are not the major source. Therefore, emissions of NO_x and ammonia can reasonably be expected to increase primarily due to an increase in the volume of commuter traffic associated with housing growth.
- 4.20 The World Health Organisation has the following critical thresholds for plant communities: The critical NO_x concentration (also known as the Critical Level) for the protection of vegetation is 30 µgm⁻³, that for vascular plants for ammonia is 3 µgm⁻³ and the threshold for sulphur dioxide is 20 µgm⁻³. Additionally, ecological studies have determined 'Critical Loads'⁴⁹ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃). Natural England has published guidance regarding the early stages of air quality impact assessment⁵⁰.
- 4.21 According to Design Manual for Roads and Bridges Volume LA105 (Air Quality)⁵¹, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant. Therefore, this

⁴⁷ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁴⁸ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

⁴⁹ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

⁵⁰ [Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations - NEA001](#)

⁵¹ <https://www.standardsforhighways.co.uk/prod/attachments/10191621-07df-44a3-892e-c1d5c7a28d90?inline=true> [Accessed 23/01/23]

distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats sites may arise due to implementation of the Plan.

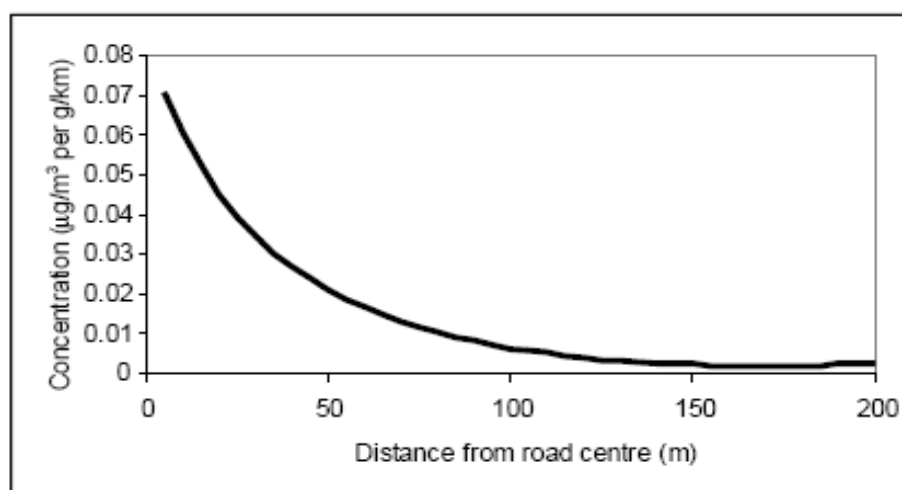


Figure 1 Schematic representation of the reduction in traffic contribution to concentrations of pollutants at different distances from a road

4.22 Overall, the following Habitats sites could be subject to a significant increase in commuter journeys due to residential development, and could be significantly affected by the Local Plan:

- North Downs Woodlands SAC
- Ashdown Forest SAC
- Peters Pit SAC

4.23 Although Queendown Warren SAC is sensitive to atmospheric nitrogen deposition, it lies more than 200m from the M2 which is the only significant road that would connect growth in Tonbridge & Malling Local Plan with that SAC.

4.24 Although some habitats (notably saltmarsh) within Medway Estuary & Marshes SPA/Ramsar site and Thames Estuary & Marshes SPA/Ramsar site are sensitive to atmospheric nitrogen deposition, the Air Pollution Information System identifies that the majority of birds for which both SPAs are designated will either be positively affected by nitrogen deposition, or neutrally affected (either entirely unaffected, or both positive and negative effects that are likely to cancel each other out). The exceptions are the curlew and tern populations of the SPA. Moreover, neither SPA lies on significant journey to work routes for residents of Tonbridge & Malling, as key employment centres in Medway (and Swale) such as Chatham, Gillingham, Sittingbourne and Faversham, all lie south of the SPAs and thus do not require visitors to traverse the SPAs.

Water Quality

4.25 The quality of the water that feeds Habitats sites is an important determinant of the condition of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

- At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects, even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.
- Eutrophication is the enrichment of water with nutrients, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further. This augments the oxygen depleting effects of eutrophication.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine (hormone) system, possibly having negative effects on the reproduction and development of aquatic life.

4.26 The primary concern in relation to freshwater and freshwater-dependent sites is the discharge of phosphorus in treated sewage effluent into Habitats sites themselves or hydrologically connected

waterbodies. Development in Tonbridge & Malling over the Plan period will cause an increase in wastewater production. Treated wastewater and sewage effluent from these works may be discharged into waterbodies that are potentially hydrologically linked to Medway Estuary & Marshes SPA / Ramsar and Thames Estuary & Marshes SPA/Ramsar site. While water quality is not listed as a pressure or threat in the Natural England Site Improvement Plan for the Greater Thames Complex (which includes both of these SPA sites), given several of the species this site is designated for are susceptible to hydrological changes, this impact pathway is carried forward for completeness.

- 4.27 Peters Pit SAC is not hydrologically linked to any potential sewage discharge. Given its hydrological sensitivity and location within the borough surface run off may impact the water quality of this site; however, given that the nearest allocated development site is located 0.9km from the site, any surface run off from this site (which would not be consented if it resulted in a net increase in runoff above greenfield rates in line with standard Environment Agency advice) would not lead to hydrological changes within the SAC and therefore this can be excluded.

Water Quantity, Level and Flow

- 4.28 The water level, its flow rates and the mixing conditions are important determinants of the condition of Habitats sites and associated qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands, terrestrial systems that have hydrological associations (e.g. wet heath) and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity and water temperature. In turn these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.
- 4.29 A widely cited review paper summarised the ecological effects of reduced flow in rivers and connected water-dependent ecosystems. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on dependent floral and faunal communities. For example, the unique nature of wetlands combines shallow water and conditions that are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians.
- 4.30 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPAs, SACs and Ramsars. For example, in many freshwater bodies and wetlands the hydrological regime is essential for sustaining a variety of foraging habitats for SPA / Ramsar waterfowl species. However, different species vary in their requirements for specific water levels. Splash and / or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging and loafing habitats for Bewick's swans and whooper swans.
- 4.31 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range for qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in Habitats sites:
- The supply of new housing with potable water may require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce water levels in Habitats sites sharing the same catchment as the abstraction sources.
 - The proliferation of impermeable surfaces in urban areas may increase the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.
- 4.32 Three Habitats sites within 10km of Tonbridge & Malling and thus relevant to the Tonbridge & Malling Local Plan are designated for habitats and species that are sensitive to hydrological change: Peter's Pit SAC, Thames Estuary & Marshes SPA/Ramsar and Medway Estuary & Marshes SPA/Ramsar. Thames Estuary & Marshes and Medway Estuary & Marshes SPA/Ramsar site are too far from the borough boundary for direct surface runoff to be a significant issue but abstraction for public water supply will need consideration for both SPAs/Ramsar sites.

- 4.33 For a site like Peters Pit SAC, development sites within 300m are most likely to pose the potential for affecting the site through surface runoff. No development sites within the T&MLP are allocated with 300m of Peters Pit SAC and therefore the impacts of surface run off can be excluded for this site. Additionally, abstraction for public water supply does not need consideration for this SAC because it is not hydrologically linked to public water supply sources.

Summary

- 4.34 In summary, the following impact pathways will be the focus of the HRA:
- Recreational pressure at North Downs Woodlands SAC
 - Air quality on North Downs Woodlands SAC, Peters Pit SAC, and Ashdown Forest SAC
 - Water quality at Medway Estuary & Marshes SPA/Ramsar site and Thames Estuary & Marshes SPA/Ramsar site
 - Abstraction for public water supply at Thames Estuary & Marshes SPA/Ramsar site and Medway Estuary & Marshes SPA/Ramsar
- 4.35 The full test of likely significant effects for policies and allocations is included in Appendix A.
- 4.36 Five of the Local Plan policies lead to likely significant effects: SP2 Delivering Homes for our Communities, SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs, SP5 Future Employment Growth, SP6 Town Centre Needs and Policy A1: Housing and Employment Allocations. These were screened in because they are the four policies that determine the quantum and/or location of growth in the borough. Associated with delivering those policies, the Local Plan allocates numerous development sites, totalling 20 employment sites and 73 residential sites within the plan area that could lead to likely significant effects. Those policies and allocations are therefore subject to appropriate assessment.

5. Appropriate Assessment

Recreational Pressure

North Downs Woodlands SAC

- 5.1 Likely significant effects of the Tonbridge and Malling Local Plan on North Downs Woodlands SAC could not be excluded in the test of likely significant effects stage due to policies SP2 Delivering Homes for our Communities, SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs, and Policy A1: Housing and Employment Allocations, or the specific allocations in the Local Plan. Therefore, this impact pathway has been progressed to appropriate assessment.
- 5.2 Reviewing aerial imagery, there are no public car parks in proximity to either parcel of this SAC. This is relevant because lack of parking opportunities is a major limitation on the number of visitors per day that is likely from greater than walking distance. Therefore, most regular visitors to this SAC will likely be restricted to those who are within walking distance of these sites. For the purposes of this report, and in line with evidence from a range of surveys of Habitats sites such as Thames Basin Heaths and Ashdown Forest, it has been assumed that additional regular on-foot or cycle visitors will be restricted to additional residential development within 2km of the component parts of the SAC. Many future residents will therefore not visit, or only infrequently visit the SAC, such that any material impacts of T&MLP housing growth will be limited to a small proportion of the new dwellings.
- 5.3 There are four residential allocations within 2km of North Downs Woodlands SAC, which total 2,230 new dwellings:
- Land North of Aylesford Lakes, Aylesford (800 dwellings) – 1.9km
 - Land east of 4 Pratling Street and south of Pratling Street, Aylesford (40 dwellings) – 1.9km
 - Land north of Holborough Lakes, Snodland (1300 dwellings) – 0.6km

- North of Pratling Street, Aylesford (90 dwellings) – 1.7km
- 5.4 Natural England's Site Improvement Plan for the site identifies public access/disturbance as a key issue for the SAC. However, this SIP identifies that the impact of this access and disturbance is primarily based on the use of offroad vehicles and all-terrain bikes within parts of the woodland and this was confirmed between Maidstone Council and Natural England as documented in the HRA of the submitted Maidstone Local Plan. The SID identified that Natural England has been working with landowners and Public Rights of Way (PRoW) officers to secure site access points. The SID was prepared in 2015 with a timescale of this work being completed by 2020. Moreover, from review of the Maidstone Local Plan HRA the recreational pressure concerns for this SAC are associated with the Wouldham to Detling Escarpment SSSI component of this SAC, north of Maidstone and located on the Pilgrim's Way, rather than the more isolated area located in Tonbridge & Malling Borough. This Local Plan makes allocations for housing 1.9km from this part of the SAC at the nearest point and thus on the limits of easy walking distance. Mapping indicates this part of the SAC north of Maidstone is also much more permeated by paths which would also support the view that this part of the SAC is the focus of recreational activity.
- 5.5 Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision requires residential development of over 6 dwellings to contribute towards the provision of open space or sports and recreation facilities. Notwithstanding the low risk of adverse effects on integrity from recreational pressure, it is recommended that as part of its open space requirements, this allocation should take the opportunity to deliver a large area of semi-natural publicly accessible open space as part of its development. Since it would be closer to the allocation than the SAC, and on less steep ground, this would underline a conclusion of no adverse effect on integrity.
- 5.6 With this additional measure to minimise the risk of significant recreational harm, it is considered that any increase in recreational pressure on this SAC due to growth in Tonbridge & Malling Borough over the plan period would not result in an adverse effect on the integrity of the SAC. To further underline this conclusion the HRA examines Local Plan policy and the protection it provides to Habitats sites.

Local Plan Policy

- 5.7 The contribution of the Tonbridge and Malling Local Plan to the in-combination recreational burden within the North Downs Woodlands SAC would be very limited compared to that of other authorities such as Maidstone, and other Local Plan HRAs in the area have concluded no adverse effect on the integrity of the SAC from growth in combination, it is nonetheless considered that an adequate policy framework is required to minimise negative impacts from recreation. The following policies within the Tonbridge and Malling Local Plan are important in this regard:
- **Policy NE1 (Conserving and Enhancing the Natural Environment)** – the policy states that '*The Council is committed to the protection, conservation and enhancement of the natural environment, through:... Protecting and enhancing sites designated for biodiversity or geological value;*' This policy details the councils commitment to protecting the environment including specific references to protected designated biodiversity sites. While this policy is non-specific as to how the council will implement these, the commitment to protect and enhance designated sites should inform planning decisions and requirements.
 - **Policy NE4 (Designated Sites, Irreplaceable Habitat and Priority Habitats and Species)** – the policy stipulates that '*Development proposals that are likely to result in a significant adverse effect, either alone or in combination with other proposals, on any internationally designated site, must satisfy the requirements of the Habitats Regulations (or any superseding similar UK legislation)*' This policy is the key legislative instrument that protects Habitats sites from adverse effects, including from recreational pressure. It ensures that adequate mitigation is delivered to reduce any negative impacts to an acceptable level. This policy also protects non-internationally designated sites and protected species.
 - **Policy NE6 (Green and Blue Infrastructure)** – the policy states '*New development proposals must ensure that the loss of existing new green and blue infrastructure is avoided, and that new green and blue infrastructure is considered and integrated into scheme design from the outset*'. By improving existing and requiring new residential proposals to provide green infrastructure, the policy makes a key contribution towards providing a more extensive inventory of nature destinations in the proximity to new homes. This will be a key driver in deflecting recreational pressure from Habitats sites.

Conclusion

- 5.8 Housing growth in the Local Plan Area is likely to be contributing to the recreational footfall within the North Downs Woodlands SAC, both alone and in-combination. However, access to the part of the site most likely to be affected by growth in Tonbridge & Malling Borough is limited by the restricted parking available and the pressure of public access is primarily caused by offroad vehicles utilising the woodlands near to Maidstone, with this measure being addressed by Natural England and Kent County Council working with landowners to secure access points. Furthermore, the Tonbridge and Malling Local Plan also contains policy wording that highlight development obligations regarding green infrastructure and a requirement for development to satisfy the habitat Regulations. In line with the HRAs undertaken for other LPAs in proximity of the SAC, adverse effects on site integrity regarding recreational pressure will not occur, neither alone nor in-combination. No further specific mitigation measures are required in support of the Local Plan.
- 5.9 **However, it is recommended that the allocation at Land north of Holborough Lakes, Snodland which is approximately 600m from the SAC and will deliver 1,300 dwellings should take the opportunity to deliver a large area of semi-natural publicly accessible open space as part of its development. There is no formal standard for this but a widely used standard is the SANG standard of 8ha per 1000 population (although this area would not be a SANG since need for mitigation has not been identified in this HRA or that of Maidstone Local Plan). Since it would be closer to the allocation than the SAC, and on less steep ground, this would underline a conclusion of no adverse effect on integrity.**

Air Quality

- 5.10 Air quality modelling was undertaken for the Tonbridge and Malling Local Plan taking account of planned housing and employment growth. This modelling also factors in the effect of the Lower Thames Crossing. The results of this modelling are included in Appendix B of this report. The Do Minimum scenario reflects traffic growth excluding the Local Plan while the Do Something scenario reflects all traffic growth in combination, including the Local Plan. The following discussion draws on these results. The modelled transects correspond to the following Habitats sites:

Habitats site	Transect Number
North Downs Woodlands SAC (Halling to Trottercliffe Escarpment SSSI)	E02a, E02b
North Downs Woodlands SAC (Wouldham to Detling Escarpment SSSI)	E04a, E05a
Peters Pit SAC	E03a, E03b, E03c
Ashdown Forest SAC/SPA	E01a, E01b, E01c

Peters Pit SAC

- 5.11 Air quality was modelled along three transects within Peters Pit SAC. Modelling of NO_x deposition indicates that the total annual mean NO_x along any of the three modelled transects at this site is 10.63µg/m³ at its highest point under the Do Something scenario (i.e. when all forecast traffic growth in combination is taken into account). While Great Crested Newt do not have a critical level of NO_x identified on APIS, much of the terrestrial habitat within this SAC is comprised of grassland. The grasslands present within the site but not a feature of this site have a critical level of 30µg/m³. Given that NO_x concentrations will be approximately one third of this level it is reasonable to assume that there will be no adverse effect due to NO_x concentrations.
- 5.12 Modelling of NH₃ concentrations indicates that the maximum total annual mean NH₃ along any of the three modelled transects at this site is 0.56µg/m³. While Great Crested Newt do not have a critical level of NH₃ identified on APIS, much of the terrestrial habitat within this SAC is comprised of grassland. Given that a critical level of 3µg/m³ is used to assess impacts on higher plants and 1µg/m³ is used to assess impacts on bryophytes, the modelled annual mean NH₃ falling below these levels across all scenarios and transects indicates that there will be no adverse effect on the SAC due to NH₃ deposition.

- 5.13 Given that Peter's Pit is a phosphate limited system rather than a nitrogen limited system, the growth of negative macrophytes and algae primarily depends on the availability of phosphate⁵². Because of this nitrogen deposition would not cause adverse impacts to the aquatic habitats within the site. Moreover, while the terrestrial habitat of great crested newts can be affected by nitrogen deposition, great crested newts have broad terrestrial habitat requirements using a wide range of different habitats. Their ability to utilise those habitats for foraging and over-wintering will not be affected by nitrogen deposition. This conclusion is supported in the Air Pollution Information System (APIS), which highlights that the susceptibility of the great crested newts of the SAC to atmospheric pollution depends on whether it is nitrogen or phosphate limited. As a result, there will be no negative effects on SAC features as a result of nitrogen deposition.
- 5.14 In conclusion, no adverse effect on integrity is forecast for Peters Pit SAC as a result of air quality impacts from the Local Plan either alone or in combination with other plans or projects.

Ashdown Forest SAC

- 5.15 Ashdown Forest SAC is designated for dry and wet heaths which are sensitive to nitrogen deposition. Despite the remoteness of the site from the local plan area, the air quality impacts of the T&MLP have been assessed for completeness. Ashdown Forest SAC is relatively remote from growth areas in Tonbridge & Malling, with no significant journey to work routes connecting the borough with the SAC. Nonetheless, transects were modelled into the SAC from the A26, the most likely road to be used by residents of growth in Tonbridge and Malling.
- 5.16 Air quality was modelled along three transects within Ashdown Forest SAC. For NO_x, total concentrations are forecast to fall below the critical level across every transect by 2042, with or without the Local Plan. The modelled transect with the highest NO_x deposition has a maximum total annual mean deposition of 7.72µg/m³ 10 m from the roadside, significantly less than the 30µg/m³ critical load for the SAC habitats. Since the critical level (the concentration of pollutants in atmosphere above which adverse effects may occur according to current science) will not be exceeded, no adverse effects will arise from NO_x in atmosphere.
- 5.17 For ammonia, total concentrations are forecast to fall below the critical levels for both vascular plants and bryophytes across every transect by 2042, with or without the Local Plan. The modelled transect with the highest NO_x deposition has a maximum total annual mean deposition of 0.58µg/m³ 10m from the roadside, significantly less than even the lower critical load of 1µg/m³ critical load for bryophytes. Since the critical level (the concentration of pollutants in atmosphere above which adverse effects may occur according to current science) will not be exceeded, no adverse effects will arise from ammonia in atmosphere.
- 5.18 The nearest heathland to the A26 within the SAC is approximately 40m from the roadside. With regards to total nitrogen deposition, the critical load for the SAC heaths is exceeded along all transects under all modelled scenarios. However, across all three modelled transects the increase in the nitrogen deposition as a result of the T&MLP, both alone and in combination, amounts to less than 1% of the critical load at the nearest area of heathland, and therefore the impacts on this area of the SAC will be imperceptible.
- 5.19 In conclusion, no adverse effect on integrity is forecast for Ashdown Forest SAC as a result of air quality impacts from the Local Plan, either alone or in combination with other plans or projects.

North Downs Woodlands SAC

- 5.20 The woodlands of the SAC are regarded to be vulnerable to an increase in nitrogen deposition. The Site Improvement Plan states that "*nitrogen deposition exceeds the site relevant critical load*". The main mechanism through which residential and employment growth in the Local Plan area could lead to an increase in nitrogen deposition is via an increase in commuter journeys along major traffic routes (typically 'A' roads) within 200m of air quality-sensitive habitats. North Downs Woodlands SAC is located in two distinct areas within and in close proximity to the plan area, one to the north, overlapping with Halling to Trottscliffe Escarpment SSSI, and one to the northeast, overlapping with Wouldham to Delting Escarpment SSSI. The northern area lies adjacent to Birling Hill, with this portion of the SAC being located approximately 2km from Snodland by road. The northeastern area is located within 200m of the A229 and well within 200m of the A249.

⁵² <http://www.apis.ac.uk/node/983>

- 5.21 Given the close proximity to major roads, air quality assessment was undertaken for transects in both these compartments of the SAC. A total of four transects were modelled, covering major roads within 200m of North Downs Woodland SAC where a greater than nominal change in traffic is expected to occur as a result of the Local Plan.
- 5.22 For NO_x, total concentrations are forecast to fall below the critical level across every transect by 2042, with or without the Local Plan. Since the critical level (the concentration of pollutants in atmosphere above which adverse effects may occur according to current science) will not be exceeded, no adverse effects will arise from NO_x in atmosphere.
- 5.23 For NH₃, the upper critical level (3 µgm⁻³) will not be exceeded on any transect under any scenario by 2042. Total concentrations are forecast to fall below the lower critical level (1 µgm⁻³) across the northern area, in Tonbridge & Malling itself, and along transect E04a off the A229 by 2042, with or without the Local Plan. However, this lower critical level is forecast to be exceeded along transect E05a (off the A249 north of Maidstone) throughout the transect when all traffic growth is considered in combination. The contribution of Tonbridge & Malling Local Plan would not exceed 1% of the lower critical level at any point and beyond 30m from the roadside is too small to be visible in the model. Therefore, while the modelling indicates that an ammonia effect along the A249 (Detling Hill) cannot be dismissed on numerical grounds, this will be driven by growth in other authorities (particularly Maidstone and Medway) rather than in the Tonbridge & Malling Local Plan..
- 5.24 With regards to nitrogen deposition, the critical load is exceeded on all transects under all scenarios. Across the northern area, in Tonbridge & Malling itself, the increase in the nitrogen deposition, both alone and in combination, amounts to less than 1% of the critical load and therefore the impacts on this area of the SAC will be imperceptible. This is unsurprising given the distance of this part of the SAC from major roads. However, across transects E04a (A229) and E05a (A249) in the northeastern area in Maidstone Borough, the in combination forecast increase in deposition exceeds 1% of the critical load for all SAC habitats. As with ammonia along the A249 this is driven primarily by growth in other authorities, particularly Maidstone and Medway.
- 5.25 Due to the proximity and scale of allocated development, the majority of new development that will impact traffic flows within 200m of the northeastern area will be located within Maidstone. As such, the HRA for the Maidstone Local Plan has also been consulted, since this was supporting by detailed air quality modelling (updated during the Local Plan Examination), and the Local Plan has since been adopted. The impact identified in the modelling of the Tonbridge & Malling Local Plan is driven mainly by growth in other authorities and the most significant of those authorities will be Maidstone. The nature of Local Plan traffic modelling is that Maidstone have modelled their growth and its associated traffic impact (including specific mitigation measures such as a bypass associated with the Lidsing Garden Community) to a greater level of detail than has been possible for the Tonbridge & Malling modelling. This is therefore very relevant modelling information to inform the likely impacts of air pollution on the SAC.
- 5.26 Modelling undertaken as part of the Maidstone Local Plan HRA for the adopted Local Plan demonstrated that, with a more detailed approach to modelling growth in Maidstone, and taking account of the use of traffic calming measures along Boxley Road / Lidsing Road to restrict traffic and discourage its use; and the connection of Lidsing Garden Settlement to the M2 J4 via the new link road, reducing traffic from the Garden Settlement past North Downs Woodlands SAC, no adverse effect on the integrity of North Downs Woodlands SAC would arise either alone or in combination with other plan or projects. Given the greater resolution and information available regarding development in close proximity to the SAC available in the Maidstone air quality modelling, it is reasonable to assume this model has a more accurate measure of air quality impacts on the SAC and therefore it can be concluded that air quality will not lead to adverse effects on the North Downs Woodlands SAC, either alone or in combination.

Water Quality

- 5.27 The test of likely significant effect indicates that there are potential impacts on both the Medway Estuary & Marshes SPA/Ramsar site and Thames Estuary & Marshes SPA/Ramsar site from the Tonbridge and Malling Local Plan through policies SP2 Delivering Homes for our Communities, SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs, SP5 Future Employment Growth, SP6 Town Centre Needs and Policy A1: Housing and Employment Allocations, and the associated allocations. Changes in water quality is not highlighted as a pressure or threat experienced by these sites within the Natural England Site Improvement Plan, however it is assessed here for completeness.

- 5.28 Both of these sites are located substantially outside of the Local Plan area, meaning that surface run off from development covered by the local plan can be excluded. The only pathway by which development within the plan area can impact either of these sites is by sewage discharge.
- 5.29 One of the key concerns whether new development can be delivered without adverse effects on Habitats sites with aquatic habitats, is whether the appropriate WwTW infrastructure is in place. WwTWs have a permitted headroom, based on their ability to process additional sewage effluent whilst remaining within the consented volume of discharge and water chemistry thresholds. These discharge consents are developed in consideration of the qualifying features of any Habitats sites and therefore remaining within the permitted headroom would mean that there will be no adverse effects on the site integrity. Southern Water is responsible for handling the wastewater produced by the local plan area. The Southern Water Drainage and Wastewater Management Plan⁵³ is the long term strategic plan setting out how waste water services will be provided. An indicative HRA of this plan concludes that the majority of the investment needs are unlikely to result in a significant effect on the features of designated sites, with common best practice mitigation measures in place.
- 5.30 It is noted that the T&MLP already contains some broad policy wording that protects the water quality within the authority from adverse effects. Policy INF1 states that 'Planning permission will only be granted where it can be demonstrated that there is or will be, sufficient infrastructure and services to meet the requirements arising from the proposed development'. Additionally, Policy CC8 (Sustainable Drainage Systems [SUDS]) specifies that surface water run-off should only enter a combined drain as a final option after consideration of natural infiltration, sustainable drainage systems and dedicated surface water sewers. This policy prevents surface water run-off from entering the standard sewage system, thus reducing the risk of unintended sewage discharge from storm events.
- 5.31 It is therefore concluded that there would be no adverse effects on the site integrity of the Medway Estuary & Marshes SPA/Ramsar and Thames Estuary & Marshes SPA/Ramsar sites regarding water quality, both in isolation and in-combination with other Plans.

Water Quantity, Level and Flow

- 5.32 The Tonbridge and Malling LP provides for new residential and employment development through policies SP2 Delivering Homes for our Communities, SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs, SP5 Future Employment Growth, SP6 Town Centre Needs and Policy A1: Housing and Employment Allocations, and the associated allocations. This will result in an increased water abstraction from groundwater or surface water bodies. This could lead to adverse effects on the integrity of Habitats sites that depend on naturally fluctuating hydrological cycles. The test of likely significant effect indicates that there are potential impacts on both the Medway Estuary & Marshes SPA/Ramsar site and Thames Estuary & Marshes SPA/Ramsar site from the Tonbridge and Malling Local Plan. While water abstraction is not identified in the Natural England SIP as a pressure or threat to these sites, it is included for completeness.
- 5.33 Water within the plan area is provided by South East Water. South East Water has produced a Water Resources Management Plan which should provide adequate water to cover the population growth anticipated in the area. This is to be done with a mix of both demand and supply side measures including leak fixing, smart meters and inter-company water transfers. The current iteration of this plan does not seek to increase the levels of abstraction except in one instance where this will occur via the purchase of an existing abstraction license. The HRA of this plan concludes that it can be delivered in such a way that avoids adverse effects on either of these two Habitats sites. Therefore, it can be concluded that there will be no adverse effect either alone or in-combination from the Tonbridge and Malling local plan via water quantity level and flow.

6. In-combination Effects

- 6.1 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the designated Habitats site(s) in question. When undertaking this part of the assessment it is essential to bear

⁵³ [Our Drainage & Wastewater Management Plans \(DWMPs\)](#)

in mind the principal intention behind the legislation i.e., to ensure that those projects or plans (which in themselves have minor impacts) are not simply dismissed on that basis but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

- 6.2 There are possible impacts of recreational pressure within North Downs Woodlands SAC, however given that there is limited parking available residents who are unable to easily walk to the site are unlikely to visit or will at most visit infrequently. Reviewing the local plans for neighbouring districts and boroughs, there is not substantial development in proximity to this SAC and therefore in combination effects do not pose a risk to this SAC with regards to recreational pressure.
- 6.3 The appropriate assessment undertaken with regards to water quality and water quantity, level, and flow draw on the HRAs of South East water's water management plan and southern water's drainage and wastewater management plan. These management plans inherently deal with the incombination requirement as they cover all waste water disposal and water provision by these companies. As such, given the conclusion of these HRAs that there will be no likely significant effect of there work, it can be concluded that the T&MLP will have no likely significant effects in combination with regards to either water quality or water quantity level and flow.
- 6.4 The air quality modelling undertaken for this report provides information on the impacts of the T&MLP both alone and in-combination. This is discussed within the appropriate assessment for air quality. We conclude that there will be no adverse effects as a result of the Tonbridge and Malling Local plan with regards to air quality in combination.

7. Conclusions

- 7.1 This HRA assessed the potential implications of the Tonbridge and Malling Local Plan on Habitats sites. The Habitats sites that have been considered in this HRA are:

Habitats Site	Location
North Downs Woodlands SAC	Within the borough
Peters Pit SAC	Within the borough
Medway Estuary & Marshes SPA/Ramsar site	6.2km north of the borough
Queendown Warren SAC	6.4km north-east of the borough
Thames Estuary & Marshes SPA/Ramsar site	8km north-west of the borough
Ashdown Forest SAC/SPA	13.3km south-west of the borough

- 7.2 The test of likely significant effects identified that the following issues required assessment:
- Recreational pressure;
 - Air quality;
 - Water quantity, level and flow; and
 - Water quality;
- 7.3 No local plan policies were identified as having likely significant effects, however the local plan allocates 20 employment sites and 73 residential sites for development which do pose likely significant effects to Habitats sites.

Recreational Pressure

- 7.4 Housing growth in the Local Plan Area is likely to be contributing to the recreational footfall within the North Downs Woodlands SAC, both alone and in-combination. However, access to the site is limited by the restricted parking available and the pressure of public access is primarily caused by offroad vehicles utilising the woodlands with this measure being addressed by Natural England and Kent County Council working with landowners to secure access points. Furthermore, the Tonbridge and Malling Local Plan also contains policy wording that highlight development obligations regarding green infrastructure and a requirement for development to satisfy the Habitats Regulations. Given the substantial size of the allocation at Land north of Holborough Lakes, Snodland and the proximity of this allocation to the SAC, it is recommended that text be added to the Local Plan requiring development at this site to provide a substantial amount of accessible open space on site or in close proximity to the site. There is no formal standard for this, but a widely used standard is the SANG standard of 8ha per 1000 population (although this area would not be a SANG since need for mitigation has not been identified in this HRA or that of Maidstone Local Plan). Since it would be closer to the allocation than the SAC, and on less steep ground, this would underline a conclusion of no adverse effect on integrity.
- 7.5 Assuming that recommendations regarding provision of open space at Land north of Holborough Lakes are implemented, then in line with the HRAs undertaken for other LPAs in proximity of the SAC, adverse effects on site integrity regarding recreational pressure will not occur, neither alone nor in-combination.

Air Quality

- 7.6 Air quality modelling was undertaken for transects at Peters Pit SAC, North Downs Woodlands SAC and Ashdown Forest SAC.
- 7.7 At all sites across all transects, NO_x levels are below critical levels for all SAC features.
- 7.8 Peters pit is below critical levels for ammonia and due to the nature of the site, being phosphate limited and only designated for GCN, there is no potential adverse effect from nitrogen deposition.
- 7.9 Ashdown Forest SAC is forecast to be below critical levels for NO_x and ammonia under all scenarios and the increase in nitrogen deposition due to the local plan, both alone and in combination amounts to under 1% of the critical load for SAC habitats at the distance from the road where the SAC heathland is located and therefore will be an imperceptible difference compared to the modelled future baseline.
- 7.10 With regards to North Downs Woodlands SAC, for NO_x, total concentrations are forecast to fall below the critical level across every transect by 2042, with or without the Local Plan. For ammonia, the upper critical level will not be exceeded on any transect, however, the lower critical level is forecast to be exceeded along transect E05a (off the A249 north of Maidstone) throughout the transect when all traffic growth is considered in combination. The contribution of Tonbridge & Malling Local Plan would not exceed 1% of the lower critical level at any point and beyond 30m from the roadside is too small to be visible in the model. Therefore, while the modelling indicates than an ammonia effect along the A249 (Detling Hill) cannot be dismissed on numerical grounds, this will be driven by growth in other authorities (particularly Maidstone and Medway) rather than in the Tonbridge & Malling Local Plan. While the modelling does indicate that nitrogen deposition from the local plan in combination will exceed 1% of the critical load in some areas of the SAC, the majority of development in proximity to the SAC and therefore development most likely to lead to air quality concerns is located in Maidstone. Maidstone has undertaken an atmospheric pollution modelling exercise to support their local plan. Given the greater proximity and scale of development, it is assumed that their model is accurate for the purposes of assessing the air quality impacts on North Downs Woodlands SAC. Factoring in the traffic mitigation measures that Maidstone Borough Council have proposed to manage air quality in response to their own local plan, it can be concluded that the T&MLP will not pose adverse effects to North Downs Woodlands SAC as a result of air quality.

Water Quality

- 7.11 The only pathway by which development within the plan area can impact Habitats sites is by sewage discharge. Southern Water is responsible for handling the wastewater produced by the local plan area. The Southern Water Drainage and Wastewater Management Plan⁵⁴ is the long term strategic plan setting out

⁵⁴ [Our Drainage & Wastewater Management Plans \(DWMPs\)](#)

how waste water services will be provided. An indicative HRA of this plan concludes that the majority of the investment needs are unlikely to result in a significant effect on the features of designated sites, with common best practice measures in place.

- 7.12 It is therefore concluded that there would be no adverse effects on the site integrity of the Medway Estuary & Marshes SPA/Ramsar and Thames Estuary & Marshes SPA/Ramsar sites regarding water quality, both in isolation and in-combination with other plans.

Water quantity, level and flow

- 7.13 Water within the plan area is provided by South East water. South East water has produced a Water Resources Management plan which should provide adequate water to cover the population growth anticipated in the area. This is to be done with a mix of both demand and supply side measures including leak fixing, smart meters and inter-company water transfers. The current iteration of this plan does not seek to increase the levels of abstraction except in one instance where this will occur via the purchase of an existing abstraction license. The HRA of this plan concludes that it can be delivered in such a way that avoids adverse effects on either of these two Habitats sites. Therefore it can be concluded that there will be no adverse effect either alone or in-combination from the Tonbridge and Malling local plan via water quantity level and flow.

Appendix A Policy and Allocations Screening Tables

Table 4. Policy Screening Table for the Tonbridge and Malling Local Plan

Policy Name	Policy Description	Screening Outcome
SP1 Spatial Strategy	During the plan period the Local Plan will: <u>Growth</u> 1. Deliver sustainable communities that balance the provision of housing, employment and infrastructure provision alongside flood risk, environmental, biodiversity, landscape, heritage and Green Belt protection. 2. Respond to the borough's diverse geography, including supporting and sustaining the role of both our urban and more rural settlements providing growth in suitable locations across the borough. 3. Focus the majority of growth within or adjacent to our most urban and sustainable settlements including those with reasonable proximity to existing transport hubs and sustainable movement opportunities. In these locations residential, employment, retail and leisure development will take place. 4. Support improvements to local services, community facilities and infrastructure through facilitating growth in the right locations to contribute to the continued sustainability of our towns and villages and ensure healthy and vibrant communities. This includes allocating growth in nearly all of our sustainable settlements. 5. Meet our housing need requirement in a way that maximises development on suitable previously developed land/brownfield sites. Given the limited amount of previously developed land in the borough, greenfield sites have been identified in sustainable locations to meet our development needs. This includes a number of 'edge of settlement' large strategic development sites that can be developed for housing, employment as well as help to deliver infrastructure to support both new and existing communities. 6. Maintain the role of our more rural settlements (Tier 5) through supporting appropriate growth to help sustain existing services and facilities or to sustain communities through appropriate small-scale housing that meets need, as supported by policies within this plan. <u>Town centres</u> 7. Ensure that town centres are supported to be vibrant, accessible, and resilient hubs for retail, leisure, employment, and community activities. 8. Protect and enhance the role of our town, district and local centres encouraging a range of uses, services and facilities commensurate with the role and function of the centre. Proposals should enhance the historic character while supporting modern retail formats and flexible workspaces. 9. Focus new retail development within our town centres which support the services and facilities provided, and improvements to the public realm which will increase footfall and improve the night-time economy. <u>Town centre strategy</u> 10. Tonbridge Town Centre will remain the principal retail and service centre, with investment in public realm, active travel infrastructure, and redevelopment opportunities including new leisure and retail facilities delivering well designed, accessible, mixed-use developments to support the local community. This includes strengthening the evening economy. 11. District centres will continue to evolve as mixed-use locations with a focus on convenience retail, employment, and community services. Development should support walkability and integration with surrounding residential areas. 12. Local centres across the borough will be protected and enhancements supported to ensure access to day-to-day services, particularly in rural areas.	No HRA implications. While part of the Spatial Strategy involves delivering both housing and employment growth this specific policy does not specify a quantum of development or locations. Those are addressed by separate policies in the Local Plan.

Policy Name	Policy Description	Screening Outcome
	<u>Employment</u> 13. Ensure that the borough sustains its strong economic base improving its range of job provision in key sectors including logistics, technology and rural enterprise. 14. Strategic and key employment sites will be protected, expanded and regenerated to ensure that employment provision is fit for purpose, including the reconfiguration of offices. 15. Allocate and focus new employment provision in sustainable locations with good transport access and in locations where the business can be supported locally by workers. 16. Support economic growth in the rural economy to ensure that the needs of land based and other rural businesses can be achieved. <u>Maintain and enhance a sustainable and attractive borough</u> 17. Maintain and where possible enhance the identity, distinctiveness and character of cherished locations. 18. Protect the Metropolitan Green belt by amending Green Belt boundaries only where 'exceptional circumstances' exist and in locations where sustainable patterns of development can be achieved. The focus will be releasing the Green Belt in the borough's most sustainable locations, as per our settlement hierarchy. 19. Balance the release of the Green Belt between delivering the development needs of the borough whilst limiting and mitigating as far as possible, the impact that Green Belt release may have on Green Belt purposes. Green Belt release will be defined by allocations proposed in this Local Plan. 20. Ensure the setting, character and identities of Kings Hill and Medway Gap settlements, East Malling, Mill Street and West Malling are protected and conserved through the identification of Green Gaps to allow the appropriate management of development. 21. Ensure that development is prioritised outside National Landscapes and their setting, while enabling some small-scale, landscape-led development within sustainable locations to help sustain and meet community needs.	
SP2 Delivering Homes for our Communities	1. A minimum housing requirement of 19,746 homes will be delivered over the plan period between 2024 – 2042, with an annual target of 1,097 dwellings. 2. Development will be supported in accordance with the spatial strategy and the site allocations set out within this Plan (and any future 'Made' Neighbourhood Plans) including windfall development coming forward within the borough's most sustainable settlements as defined by settlement confine boundaries. 3. Small scale development will also be supported in accordance with Policy SP3 and other relevant policies within the Plan.	Likely Significant Effects present This policy sets out the overall housing requirement for the borough. The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
SP3 Settlement Hierarchy and General Development Principles	1. Development will be supported in addition to allocations proposed within this plan within sustainable settlements as defined by the settlement hierarchy. This includes Tier 1 – Tier 4 settlements. Development will be supported, subject to meeting other policy requirements in this Plan or within made Neighbourhood Plans. Development in the countryside 2. Areas outside the defined settlement confine boundaries will be protected and will be considered to be countryside for planning purposes, unless development is supported by a specific policy referenced in this plan or elsewhere. Tier 5 Rural settlements	No HRA implications This policy does not specify a quantum or location of development, and the settlement hierarchy in itself does not affect European sites.

Policy Name	Policy Description	Screening Outcome
	3. As an exception to (2) above, some very limited residential development either within (infill) or directly adjacent (limited frontage development) to Tier 5 settlements may be considered acceptable where this is justified on the basis of supporting the continued sustainability of the settlement, including meeting local housing need. This will only be acceptable subject to meeting the following criteria: a. The scale of the residential development is proportionate to the size of the settlement and the type and level of local services available; b. The development takes into account its countryside location in relation to design; c. It can be linked to the retention or expansion of specific infrastructure or service assets within the settlement; d. It has community support, either through a Neighbourhood Plan, or other Parish endorsement, for example as a Rural Exception Site. e. Suitable and safe vehicular access can be provided to the site including the provision of footpaths. 4. In all other circumstances, countryside policies will apply.	
SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs	To meet the identified accommodation need for Gypsies, Travellers and Travelling Showpeople within the Borough up to 2042, the Council will make provision for 33 pitches for Gypsies and Travellers in accordance with the needs identified in the GTAA for those who meet the PPTS definitions.	Likely Significant Effects present This policy sets out the overall residential requirement for the borough. The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
SP5 Future Employment Growth	The council will support positive economic growth across the borough and will seek to meet employment needs in full. At a minimum we will deliver 301,000 sqm of B2 and B8 employment floorspace and 60,500 sqm of office floorspace over the plan period. This will be achieved through the following measures: a) The allocation of employment sites as set out in Policy A1 (chapter 14); b) The delivery of existing commitments for employment uses; c) The retention of existing employment premises; d) Supporting existing business through new floorspace, redevelopment conversion, upgrading, intensification or reconfiguration of floorspace on existing sites; e) Supporting economic development in rural areas and farm diversification; and f) Supporting the provision of new office floorspace in sustainable locations.	Likely Significant Effects present This policy sets out the overall employment requirement for the borough. The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
SP6 Town Centre Needs	The Council will seek to meet the identified retail floorspace need of 18,250 sqm through existing commitments, vacant units / reoccupation of space and through new local centres within strategic allocations to support new communities.	Likely Significant Effects present This policy sets out the overall employment requirement for the borough. The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
SP7 Green Belt	1. Tonbridge and Malling's Green Belt as designated on the Policies Map, will be protected against inappropriate development in line with national policy. 2. The beneficial use and management of land in the Green Belt will be supported, particularly where it protects and enhances the wider blue-green	No HRA implications This policy does not promote a specific quantum or location of

Policy Name	Policy Description	Screening Outcome
	infrastructure network as set out in the Green and Blue Infrastructure Strategy, contributes to the Kent and Medway Nature Recovery Strategy and is consistent with the essential characteristics of openness and permanence of the Green Belt.	development and therefore presents no impact pathways to Habitats sites
SP8 Managing Development in the Green Belt	1. Inappropriate development within the Green Belt (as shown on the Policies Map) will be resisted in accordance with national planning policy. Inappropriate development is by definition harmful to the Green Belt and will only be approved in very special circumstances. 2. Development that is not inappropriate development will only be permitted where: - the siting, scale, height and bulk of the proposed development is sympathetic to and compatible with the primary aim of preserving the openness of the Green Belt; - it displays a high standard of design and landscaping, and takes all measures to ensure that the visual impact on the wider Green Belt is minimised; - the nature, quality, finish and colour of materials reflect the local landscape character (as defined in the Landscape Character Assessment and National Landscape Management Plans where relevant); and - appropriate parking provision, safe access, egress and landscaping is provided to ensure vehicles are parked safely. 3. Applications for all development proposals in the Green Belt will require a Green Belt Assessment, in accordance with methodology set out in the Planning Practice Guidance, including for development utilising grey belt land in whole or in part. 4. Where major development involving the provision of housing is proposed on land in the Green Belt, or on an allocation released from the Green Belt (as identified on the Policies Map), the following Golden Rules contributions should be made and evidenced in the accompanying Planning Statement: - the provision of 50% affordable housing ; - the necessary improvements to local or national infrastructure as set out in the Infrastructure Delivery Plan; - the provision of new, or improvements to existing, green space that are accessible to the public; and measures to protect and enhance the current green and blue infrastructure of the borough as set out in the Tonbridge and Malling Green and Blue Infrastructure Strategy. The provision of any new open space should be in accordance with the open space standards set out in Policy INF5 Outdoor and Indoor sports, recreation and open space provision. - Positive contributions to the landscape setting of the development having regard to the Tonbridge and Malling Landscape Character Assessment; - Where land is released from the Green Belt, and where the Green Belt Assessment identifies that the new Green Belt boundary requires strengthening, development proposals will need to address these requirements; and - Where land is identified as having particular potential for habitat creation or nature recovery within the Kent and Medway Nature Recovery Strategy, green space proposals should contribute to these outcomes. Extensions, Alteration and Replacement Buildings 5. Extensions and alterations to buildings in the Green Belt should not be disproportionate to the original building and should be in accordance with Policy D2. Replacement buildings should be in the same use as and not materially larger than the previous building.	No HRA implications This is a policy concerned with managing greenbelt development rather than promoting a quantum or location of growth.

Policy Name	Policy Description	Screening Outcome																				
	6. In all cases, whether a development is disproportionate to or materially larger than the original building will be assessed by considering: a. The scale, mass, height, footprint and volume of the development proposed; b. The degree of activity likely to be generated, including traffic; c. The duration of the development, and its remediation; and d. The extent of existing development on the site.																					
SP9 Local Green Gap	1. A Local Green Gap between the settlements of Kings Hill, West Malling and the Medway Gap (including East Malling and Mill Street), as shown on the Policies Map is defined to retain the existing settlement pattern by maintaining openness, provide long-term protection against coalescence and to protect the setting and separate identities of these settlements. 2. Within the Local Green Gap, countryside policies will apply, and only proposals that demonstrably maintain the integrity of the gap will be supported, and such proposals must contribute positively to the landscape, biodiversity, or recreational value of the area.	No HRA implications This policy does not promote a quantum or location of growth																				
Policy A1: Housing and Employment Allocations	To meet the identified need for new housing and employment land to 2042, the following sites, as defined on the Policies Map, are proposed for allocation. All housing and employment site allocations must be delivered in accordance with the development plan when read as a whole. There then follows a table of allocations which are presented in a separate table in this HRA.	Likely Significant Effects present This policy sets out the overall residential requirement for the borough. The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow																				
Policy H1: Housing to Address Needs	1. The council will respond to meeting local housing need by seeking to support the delivery of a wide choice of high quality and well-designed homes which will contribute to the creation of mixed, balanced, inclusive and sustainable communities. 2. Proposals for all housing schemes will be expected to provide for a mix of dwelling types, tenures, and sizes as well as provide a range and mix of housing formats to meet both national and local policy requirements and to meet local housing needs, as evidenced in the latest Strategic Housing Market Assessment and / or other relevant evidence that is provided to justify the mix of homes required during the plan period. 3. Housing development will be supported that is consistent with policies in this local plan including the settlement hierarchy and spatial strategy. Housing mix 4. The council will seek the following housing mix by tenure: <table><tr><th></th><th>Market</th><th>Affordable home ownership</th><th>Affordable housing (rented)</th></tr><tr><td>1-bedroom</td><td>10%</td><td>20%</td><td>25%</td></tr><tr><td>2-bedrooms</td><td>30%</td><td>45%</td><td>35%</td></tr><tr><td>3-bedrooms</td><td>40%</td><td>25%</td><td>30%</td></tr><tr><td>4+-bedrooms</td><td>20%</td><td>10%</td><td>10%</td></tr></table> 5. Where applicants propose a different mix of market and affordable homes than that detailed above, proposals will only be supported where they are supported by up-to-date evidence of need including that which demonstrates the suitability of the proposal in relation to the following, which is not listed in priority order: a. Site viability; b. The context, character, density and location of the site / development including whether brownfield or greenfield development;		Market	Affordable home ownership	Affordable housing (rented)	1-bedroom	10%	20%	25%	2-bedrooms	30%	45%	35%	3-bedrooms	40%	25%	30%	4+-bedrooms	20%	10%	10%	No HRA implications. This is a development management policy relating to the proportion of housing within developments that should be of certain sizes and tenure. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
	Market	Affordable home ownership	Affordable housing (rented)																			
1-bedroom	10%	20%	25%																			
2-bedrooms	30%	45%	35%																			
3-bedrooms	40%	25%	30%																			
4+-bedrooms	20%	10%	10%																			

Policy Name	Policy Description	Screening Outcome
	c. Site constraints; d. The role and function of the development location and the specific characteristics of local households; e. Diversifying housing stock to ensure equitable housing provision for all; f. Accessibility to local transport and transport connections; g. Market demands and market conditions including the existing mix and turnover of properties at the local level; and h. Housing Register Data or other relevant evidence.	
Policy H2: Affordable Housing	1. To meet the borough's need for affordable housing, development proposals which include a residential element (including C2 and permanent residential caravan sites) will be required to deliver 40% affordable housing on site where: a. proposals are for 10 or more (net) units, or b. proposals for 6 or more units within a National Landscape, or c. where sites provide 0.5 hectares or more of developable area. Financial contributions will be sought in lieu of on-site affordable housing on permanent residential caravan sites. 2. Relevant proposals as above must include an Affordable Housing Statement that sets out how the application meets policy requirements. Provision should accord with the definition of affordable housing as set out within national policy and in accordance with the policies of this plan. Affordable housing should genuinely be affordable to those identified as being in housing need as set out by the government eligibility criteria and any relevant policy requirements. 3. At least 50% of the housing must be affordable, on land which is proposed to be released from the Green Belt or on land within the Green Belt. Tenure mix of affordable homes 4. Developments will be required to deliver a mix of affordable housing tenures. This should include a tenure mix of 50% social rent, 30% affordable rent and 20% intermediate accommodation unless a different tenure mix would be more suitable taking into account the location of the site and any other relevant factors. Where intermediate products are proposed there should be a preference of shared ownership. However, alternatives to shared ownership may be delivered where it is demonstrated that this will contribute to meeting local affordable housing need as indicated by up-to-date evidence and where these can be demonstrated to be genuinely affordable. 5. All affordable housing secured through policy must remain affordable in perpetuity. Legal agreements will make provision for achieving clawback on long-term phased schemes if affordable housing is converted to another tenure. Exceptional circumstances 6. The council will seek to maximise affordable housing delivery, however, there may be exceptional circumstances where on-site affordable housing is not viable. In these circumstances, evidence will be required to be submitted to demonstrate why the level or tenure mix of affordable housing cannot be achieved on site. Any proposal for alternative tenure mix or a reduction in affordable housing provision should be discussed with the council at the earliest opportunity alongside the submission of detailed evidence for not meeting the policy. 7. In the exceptional circumstances where it is not viable to deliver affordable housing on-site, then either off-site serviced plots or a commuted sum in lieu of on-site delivery for the same number of units will be required. Viability will be subject to an independent assessment at the applicants cost. All proposals required to submit evidence of viability will be subject to viability reviews. Should viability improve prior to completion then affordable housing contribution would change accordingly. 8. Where a lower percentage of affordable housing or differing tenure mix is agreed on viability grounds, developers will be required to enter into an agreement that allows affordable housing contributions to be made in the future should higher levels become viable through an overage clause. The council will require viability to be re-appraised on subsequent phases of larger schemes of 10 units or more.	No HRA implications. This is a development management policy relating to the proportion of housing within developments that must be offered as affordable housing. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	Design 9. The affordable housing provision must be well-integrated into a scheme and externally indistinguishable from market housing, including quality of materials, design and open spaces. The units should be located throughout the site in a manner that supports integration but can also be managed efficiently by Registered Providers.	
Policy H3: Build-to-rent	- To help meet affordable housing need and to diversify housing supply through the provision of rental homes, the council will support build-to-rent proposals in sustainable locations with good public transport connections. Build-to-rent schemes should: - Provide at least 10 homes; - Provide high-quality accommodation that fosters a sense of community through the provision of communal areas, community facilities and services as part of the development; - Provide sufficient internal space for all new dwellings, including changes of use and conversions, to cater for future occupants. The gross internal floor area for each new dwelling should meet or exceed the Nationally Described Space Standard or any subsequent equivalent space guidance; - Offer a range of tenancy options to suit the renter including a minimum 3-year tenancy to meet renter needs - Is secured for the long-term (e.g. minimum 30 years); and - Will be professionally managed and preferably in single ownership and management control. - A build-to-rent scheme, will be required to provide at least 20% of units as Affordable Private Rent to be maintained in perpetuity. The affordable private rent units must be at a minimum discount of 20% to local market rents and must be let to households with a local connection. They must also be built and maintained to the same standards as the build to rent properties; - A viability appraisal will be required to demonstrate affordable housing contributions, paid for by the applicant; and - Proposals for build-to-rent schemes should submit a build-to-rent report setting out how it intends to operate, manage and let the build-to-rent Scheme, to be agreed with the Council.	No HRA implications. This is a development management policy setting out requirements for the construction of any Build to let schemes within the Plan area. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy H4: Gypsy, Traveller and Travelling Showpeople – Safe Guarding Sites	The council will safeguard and protect existing Gypsy, Traveller and Travelling Showpeople sites. Where a loss is proposed, and there is a need in the Borough for pitches or plots, proposals will only be permitted where alternative provision is made, resulting in no net loss, and is in either an equivalent or an improved location. The alternative site must be provided before the original is lost and this will be secured as either a planning condition or via a S106 agreement. Should a site have a personal planning condition attached to it relating to the site occupier, the council will support applications to modify or remove the condition (as relevant) to allow the continued use of the site as a Gypsy, Traveller and Travelling Showpeople site in perpetuity.	No HRA implications. This is a development management policy preventing the loss of existing Gypsy, Traveller and Travelling Showpeoples sites. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria	- Proposals for new, extended or intensification of permanent or temporary gypsy, traveller and travelling showpeople sites will be supported where applications meet the following criteria: - The site is in a sustainable location and is either located within or adjoining a settlement confines boundary or within good proximity to a range of services including shops, schools and primary health care facilities accessible by public transport, to enable integration into the community; - The site is suitable in terms of vehicular access for cars, caravans and emergency vehicles, parking, turning, road safety and servicing arrangements, and has access to essential services such as water supply, sewerage, drainage and waste disposal; - Appropriate landscaping is included within the proposal to ensure that the scheme does not result in any adverse landscape impacts. In cases where proposals are in or adjacent to a National Landscape, the scale and the extent of development should be limited, sensitively located and designed to enhance, mitigate or avoid impacts; - The site is not affected by adjacent uses or environmental hazards that may affect the residents' health or welfare or be	No HRA implications. This is a development management policy preventing the loss of existing Gypsy, Traveller and Travelling Showpeoples sites. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	located in an area of high risk of flooding, including functional floodplains e) The site promotes peaceful and integrated co-existence between the site and the local community f) The site demonstrates the extent to which traditional lifestyles (whereby some travellers live and work from the same location thereby omitting many travel to work journeys) can contribute to sustainability g) The site is suitable in scale when considering its location and the settlement hierarchy and the range of existing local infrastructure and services; h) The proposal achieves a well-designed lay-out, includes amenity space and space for equipment and animals with minimal hard standing and permanent structures and integrates with adjacent communities. Where amenity blocks are proposed these must be appropriate to the scale of the site; and i) Proposals make adequate provision for on-site facilities that meet best practice for modern Traveller site requirements, including, storage, provision for recycling and waste management; j) No vehicle over 3.5 tonnes shall be stationed, parked or stored on the site; and k) All proposals must comply with The Caravan Sites and Control of Development Act 1960 and the Caravan Sites Act 1968. 2. Where there is a demonstrated need for additional plots / pitches, suitable expansion or the intensification or regularising of existing sites will be supported by the council subject to meeting policy requirements. Where windfall sites are proposed then the application must demonstrate that the national policy definition for gypsy and travellers and travelling showpeople can be met as well as demonstrating that there is a strong local connection to the area. 3.	
Policy H6: Specialist Housing to Meet the Need of Older and Vulnerable People	1. Given the borough's need for specialist accommodation for older and vulnerable communities, sites between 20 to 99 dwellings, will, subject to viability, be required to deliver at least 5% specialist accommodation as C3 and schemes for 100 or more dwellings will be required to deliver 5% specialist accommodation as either C3 dwellings or C2 equivalents taking into account local housing need. 2. The council will support development proposals for specialist housing⁵⁵ for older people and vulnerable groups. Proposals will be considered to take the following into account: a. That the proposal makes a positive contribution to the borough's need for specialist housing as set out in the council's Strategic Housing Market Assessment and/or is supported by robust up-to-date evidence to support the proposal in the context of the local area for which the development will be located; b. That the proposal seeks to meet the evidenced needs of the older or vulnerable community, ensuring that provision is affordable for the intended occupants and is of an appropriate mix; c. That any proposal for accommodation is located in a sustainable location, within a settlement confines boundary and with good accessibility to infrastructure and services including shops, community facilities, public transport, primary health care, all of which could be reached without a car; d. That the proposal is suitable in relation to the nature and topography of the site and that appropriate infrastructure can be provided to support walking and wheeling; e. The design and layout addresses the health and well-being needs of older and vulnerable people, including,	No HRA implications. This is a development management policy setting out requirements for the construction of any specialist housing within the Plan area, the proportion of specialist housing to be delivered as part of developments, and the conditions required for the loss of any specialist housing. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

⁵⁵ Specialist housing for older people include Age-restricted general market housing, Retirement living or sheltered housing (housing with support), Extra care housing or housing-with-care (housing with care) and Residential care homes and nursing homes (care bedspaces).

Policy Name	Policy Description	Screening Outcome
	where appropriate, those with dementia and other long-term conditions; f. The proposal meets the accessibility policy H7, the Nationally Described Space Standard and provides amenity and garden space appropriate to the scheme as well as appropriate refuse storage. g. An appropriate level of car parking is provided for residents, staff and visitors delivered in line with Kent County Council Parking standards including electric vehicle charging points. h. The accommodation is appropriately designed and supported by a Care Needs Assessment to justify the development proposal's scale, design, tenure and accommodation type; and i. The proposal provides affordable housing as set out in Policy H2 of this plan, calculated based on floorspace. 3. The loss of specialist accommodation for older or vulnerable communities will not be supported unless: a. Evidence demonstrates that there is no longer an identified need for the accommodation within the borough; b. Alternative provision that meets the borough's needs is provided elsewhere; or c. The housing cannot be converted to alternate specialist provision for older or vulnerable people / communities due to it not being able to meet minimum standards for any form of specialist accommodation or it is not viable to improve the accommodation to provide any form of specialist or social care accommodation.	
Policy H7: Accessible and Adaptable Homes	1. To meet the Borough's need for accessible and adaptable homes, all new dwellings (in all tenures) will be required to meet the accessibility standards set out in part M4(2) of the Building Regulations, subject to site suitability. 2. On schemes of 20 or more, developments will be required to meet M4(3) standards for 5% of the dwellings proposed in the market sector and 10% of all affordable housing provision. 3. The approach to providing accessible and adaptable homes should be discussed with the council at an early stage in the application process to ensure that the scheme proposed can reflect local need. 4. Only in circumstances where it can be robustly demonstrated by the applicant that it is not practicable or financially viable to deliver the provisions above or where the requirements are clearly incompatible with the location, will new development be exempt from this policy requirement. This will need to be evidenced by a viability assessment, paid for by the applicant. 1.	No HRA implications. This is a development management policy setting out requirements for housing to meet accessibility requirements and the proportion of accessible housing to be delivered as part of developments. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy H8: Self and Custom Build Housing	1. To diversify the housing market and increase consumer choice, the provision of new homes of a high-quality design through Self-Build, custom housebuilding and other community led approaches will be supported in sustainable locations to meet the demand for self-build and custom housebuilding in the borough. 2. A minimum of 5% of dwellings on sites of 70 or more homes must be delivered as self or custom build plots on site. The onus will be on the applicant to demonstrate that self or custom build plots are not required based on evidence. 3. Self or custom build plots should: a. Once delivered, be properly marketed at a reasonable price for a period of 6 months before the plots can revert to market accommodation;	No HRA implications. This is a development management policy setting out requirements for self and custom build plots, and the proportion of self or custom build plots to be delivered as part of developments. This policy does not control either the

Policy Name	Policy Description	Screening Outcome
	b. Be marketed to those with a local connection or to those on the self and custom build register for the first three months, with the remaining time being marketed to others with an interest; c. Provide a suitable housing mix and size of plots reflecting housing need and the housing market in the local area, ensuring that the land provided uses land efficiently and provides an appropriate density. 4. The Self-Build or Custom house building projects will be required to be of a high-quality design and have regard to policies within this plan and National Guidance. For sites which either propose or have potential to contain 10 or more units of Self Build or Custom Build accommodation, a Design Code will be required to encourage a coordinated approach to the design and development of individual plots. 5. The provision of Self and Custom build plots will be in addition to the level of affordable housing as required by this Local Plan.	quantum or location of new development. There are no linking impact pathways present.
Policy H9: Houses in Multiple Occupation	Where planning permission is required, proposals for the change of use of an existing residential property to a house in multiple occupation (HMO) will be supported if the following criteria are met: a. Existing homes must be capable of conversion without causing harm to the amenity of future occupants, neighbours or wider area and without significant extension or alteration to the existing property. b. The scheme does not adversely affect the character of the area including by eroding the balance between different types of housing; c. Living spaces and communal facilities are of a good standard and are suitable for the intended residents; d. The development must not cause privacy or noise issues for occupants or neighbouring properties; e. The scheme provides suitable vehicular access and adequate car and cycle parking / storage is provided on site, unless the site is located within 800m of a defined town centre, that offers regular public transport services; f. Adequate space is provided to accommodate bin and recycling storage areas. g. Evidence is provided to demonstrate how a good standard of management will be provided; and h. All proposals must comply with the Council's HMO Amenity Standards and Kent Parking Standards or the most updated standards.	No HRA implications. This is a development management policy setting out requirements for the conversion of existing residential properties into houses of multiple occupation. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy H10: Residential extensions, alterations, annexes and ancillary accommodation	The Council will permit alterations and extensions to buildings which: a) Are compatible with and integrate coherently with the character of the original building in terms of elevational design, layout, size, bulk, mass, height and position, use of dormers and window placement and choice of materials which should be in visual harmony with the original dwelling; b) Are set behind the building line to provide a visual break. With two storey or first floor flank extensions a minimum gap of 1 metre from the common boundary with the adjoining dwelling should be retained for the whole length of the extension. Roofs should be designed to complement the existing roof type and tiled to match the existing dwelling; c) Will not result in unacceptable loss of privacy and sunlight, or unacceptable overlooking or overshadowing to neighbouring properties. New windows and balconies should have their principal outlook so that it avoids direct overlooking into such areas. Windows which have a flank outlook into the private garden area of an adjoining property will not be permitted; d) Are not detrimental to the amenity and character of the locality and streetscape; and e) Do not cause harm to the special architectural character of listed buildings and non-listed buildings in conservation areas. Proposals for annexes and ancillary accommodation, must: f) Be within the garden of the main dwelling and have a functional connection with the main dwelling (for example, the occupant should be a dependent relative of the residents of the main dwelling or employed at the main dwelling);	No HRA implications. This is a development management policy setting out requirements for alterations and extensions to existing buildings and for the construction of annexes and ancillary accommodation. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

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	g) Be used in conjunction with the main house and be in the same ownership as the main dwelling; h) Be of an appropriate layout with sufficient usable space and contain windows in all habitable rooms to facilitate comfortable living conditions with natural light and ventilation; i) Be designed in such a way as to easily allow the annex to be used at a later date as an integral part of the main dwelling and have no boundary demarcation or subdivision of the land between the main dwelling and the annexe; j) Be accompanied by a written statement to explain who it will be used by, their relationship with the occupants of the main house and how the use of the annexe will comply with this Policy; k) Where an annexe is permitted, the council will ensure that occupation of the proposed annexe is tied to the existing host dwelling by use of a planning condition of s.106 agreement as appropriate; and l) In cases where an extension, outbuilding and/or annex is permitted, particularly in rural locations, the Council will consider attaching a planning condition(s) to that approved planning permission to remove permitted development rights where it is considered that subsequent extension to the dwelling will adversely impact the character of the area, or the amenities of neighbouring occupiers.	
Policy HE1: The Historic Environment	Development proposals will be supported where they conserve or enhance the historic environment, based on the following approach: 1. Development will contribute towards the conservation and enjoyment of the borough's historic environment and will make a positive contribution to its character and distinctiveness. 2. All designated heritage assets and their settings will be given a high level of protection and should be conserved and enhanced in a manner appropriate to their significance. All non-designated heritage assets including locally listed heritage assets and their settings as relevant will also be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment. 3. The change of use of heritage assets, including buildings in Conservation Areas, will only be permitted where the proposed use is considered to be the optimum viable use that is compatible with the significance of the heritage asset, its features and setting and will secure the long-term sustainable future of the heritage asset as well as its conservation and enhancement. Development affecting a heritage asset should not compromise future restoration opportunities. 4. Where heritage assets are identified to be at risk, from neglect, decay and other threats, a positive pro-active approach will be applied. Landowners shall be expected to engage with the local planning authority to bring forward proposals to preserve or enhance these assets, to facilitate their successful rehabilitation and seek their viable re-use consistent with their heritage value and special interest. 5. Proposals for total or substantial demolition of a heritage asset will only be granted in exceptional circumstances, and where it meets the following specific criteria: a) Clear and convincing evidence has been provided that demonstrates viable alternative uses cannot be secured; b) Planning permission has been approved for redevelopment that would result in significant benefits for the community which would definitively outweigh the subsequent loss from demolition or major alteration; and c) The physical condition of the building has deteriorated, to a point that the cost of retaining the building outweighs its importance and the value derived from its retention. A comprehensive structural report shall be provided to support and demonstrate this. 6. Development proposals affecting any heritage assets (both designated and non-designated) and /or their setting must demonstrate sufficient understanding of the significance of the heritage asset and / or its setting and for this information to be used at an early stage to inform development proposals in order to avoid or minimise harm, ensuring that heritage is at the heart of place-making. Heritage statements must provide detail proportionate to the importance of the heritage asset. Such assessments shall demonstrate the following: a) How the understanding of significance has informed the principles of the proposal and the potential impact of the proposal on the heritage asset and why the works proposed are desirable or necessary. As a minimum, the historic environment record as well as the Tonbridge and Malling Heritage Strategy should be consulted and positively addressed within the heritage statement including referencing the heritage themes of the strategy that apply [if	No HRA implications. This is a development management policy setting out requirements for the construction of any specialist housing within the Plan area, the proportion of specialist housing to be delivered as part of developments, and the conditions required for the loss of any specialist housing. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

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	applicable] and the heritage assets assessed using the appropriate expertise where necessary; b) Has considered and positively addressed the cumulative impact of incremental change from development on the significance of heritage assets; and c) Proposals affecting historic farmsteads within the borough shall be informed by and draw upon the Kent Farmsteads Guidance [2014] or its equivalent replacement. 7. Where a proposal would result in the partial or total loss of a heritage asset or its setting, the applicant will be required to secure a programme of recording and analysis of that asset and archaeological excavation where relevant and ensure that the information is recorded to an appropriate standard and submitted to the Kent Historic Environment Record.	
Policy HE2: Listed Buildings	Development proposals affecting statutorily listed buildings shall have special regard to the desirability of preserving the asset or its setting. Loss of or harm to a statutorily listed building or its setting will only be permitted in exceptional circumstances, where it can be demonstrated that the loss or harm achieves substantial public benefits. Proposals affecting statutory Listed Buildings will be required to; - Preserve or enhance the historic character, qualities and special interest of the building; - Not be detrimental to the architectural and historical integrity and detailing of the Listed Building's interior and exterior; - Protect the special interest of buildings of architectural or historic interest; - Protect, and where possible enhance the setting of the building; 2. Proposals will be supported for alternative uses for listed buildings including change of use applications that contribute positively to their conservation either individually or as part of wider strategies for regeneration and must be compatible with, and respect, the special architectural or historic interest of the asset and setting. The Local Planning Authority will support proposals that improve public access where these are not prejudicial to the heritage assets existing character or appearance. 3. Proposals to install energy efficiency improvements or improve environmental sustainability will be supported where it can be demonstrated that the proposed measures take a 'whole building approach' and are suitable for the asset, and informed by an understanding of their specific performance, including construction and materials. The suitability of improvements will need to be weighed against the significance of the asset and / or its setting, or any features of special architectural / heritage interest that may be impacted. In accordance with policy HE1(6) above, as part of the application, additional details shall also be submitted in the form of a structural report to demonstrate that the integrity of the building would not be undermined including any proposed internal/external alterations.	No HRA implications. This is a development management policy setting out to protect listed buildings with criteria for any proposal affecting statutory listed buildings, support for changes in use of listed buildings provided their historic and architectural value is preserved. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy HE3: Conservation Areas	- Development proposals within or affecting a Conservation Area will be supported where it is demonstrated to preserve or enhance the character or appearance of the Conservation Area and its setting taking into account cumulative impact. - All new development and alterations within or affecting Conservation Areas and their settings shall: - Be of an appropriate land use that respects the origins and development of the settlement, historic functioning, character and appearance of the area. - Be sensitively designed to respect the physical form, layout, scale, massing, architectural features, materials, height, building lines, roofscapes, relationships between buildings and the spaces and enclosures between them; - Preserve trees and landscaping, open spaces, historically significant boundaries, boundary treatment including historic walls and railings that positively contribute to the character and appearance of the Area; - Preserve traditional features such as shop fronts, signage, street furniture and lighting and surface treatment including the absence of kerbstones in some areas that positively contribute to the character and appearance of the Area; - Preserve important views and vistas into and out of the Conservation Area including views of surrounding landscapes; and - Take into consideration and positively address any recommendations set out in the applicable Conservation Area Appraisal (where one is adopted).	No HRA implications. This is a development management policy requiring development proposals that impact conservation areas to preserve and enhance the character and appearance. This includes a requirement to meet certain criteria for developments, alterations and demolitions. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	3. Proposals involving demolition or substantial demolition will only be granted, subject to conditions, if it can be demonstrated that: a) The structure to be demolished makes no material contribution to the special character or appearance of the Conservation Area; or, b) It can be demonstrated that the structure is beyond repair or incapable of an alternative suitable use; or c) The removal of the structure and its subsequent replacement would enhance the area; and d) Redevelopment of the site that would make an equal or greater contribution to the character and appearance of the conservation area. 4. Proposals for energy efficiency and/or measures to mitigate climate change will be supported, as appropriate, where they preserve or enhance the character or appearance of the Conservation Area and its setting and are easily reversible. 5. The council will review its Conservation Areas and update conservation area appraisals and management plans and these will be used to assess relevant applications. Applications will be supported where recommendations are implemented.	
Policy HE4: Historic Parks and Gardens (Designated and Non-Designated)	Development proposals affecting Historic Parks and Gardens on the national register or of local significance (as listed within the Kent Gardens Compendium and Annex 3) will be supported where they maintain, conserve or enhance the character, appearance, historic interest and setting, significance, design and layout of the landscape and views into and from the historic park or garden.	No HRA implications. This is a development management policy requiring development proposals that impact historic parks and gardens to preserve and enhance them. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy HE5: Archaeology	1. The borough's archaeology and historic integrity of Scheduled Monuments and other important archaeological assets, as well as their settings, will be conserved and where possible enhanced. 2. Where it is considered that a development could either directly or indirectly impact on a heritage asset with archaeological interest (above or below ground), development will only be permitted where it can be justified in the archaeological interest (significance) of the heritage asset or its setting. This includes direct impacts on designated sites e.g. Scheduled Monuments, indirect impacts on the setting of designated sites and impacts on sites of archaeological interest. 3. Development proposals on sites where there is, or is the potential for, an archaeological asset, shall include an appropriate desk-based assessment of the asset. Where the assessment reveals that important or potentially significant archaeological assets may exist, developers will be required to, where necessary, undertake field surveys/evaluations by an appropriately qualified person prior to the determination of the planning application. Such an evaluation shall determine; a) The character, significance and condition of any archaeological deposits or structures within the application site; and b) The likely impact of the proposed development on the archaeology, its significance and setting; and c) Measures to mitigate the effect of the proposed development including a statement setting out the impact of the development. 4. All stages of archaeological fieldwork shall be subject to a Written Scheme of Investigation approved by the local planning authority. No development shall take place on the proposed development site until the applicant, or their agents or successors in title, is in receipt of a Written Scheme of Investigation that has been approved by the Local Planning Authority. 5. In circumstances where development proposals affect non-designated heritage assets within an archaeological setting, the Council will expect the archaeological deposits to be preserved in-situ. On sites where this is not possible, clear justification will be required. Where the justification is accepted, a programme of archaeological excavation and recording is likely to be required to be carried out. The fieldwork will be proportionate to the significance of the archaeological asset and must be carried out by an appropriately qualified contractor following a written specification agreed by the Borough Council. The programme will include all phases of desk-based and	No HRA implications. This is a development management policy requiring the conservation of the borough's archaeology and Scheduled Monuments. This includes a requirement to meet certain criteria for developments where there is, or is the potential to be archaeological deposits or structures. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	fieldwork, post-excavation analysis, publication of the results and deposition of the site archive in an appropriate repository.	
Policy HE6: Enabling Development for Heritage Assets	1. Applications proposing enabling development to a heritage asset where there is no other alternative option available, which may conflict with policies in this Plan and/or national planning policies but would secure the future conservation of a heritage asset will be supported where it is demonstrated to meet the following criteria: a) The proposal will not demonstrably harm the heritage values of the asset or its setting; b) It can be demonstrated that alternative solutions were unsuccessful; c) The proposed development is the minimum necessary to protect the significance of the heritage asset; d) The proposal complies with the guidance set out in the Historic England Enabling Development and Heritage Assets GPA4 (2020) or its equivalent replacement; e) A legal agreement to secure the restoration of the asset is agreed and signed; and f) It facilitates public appreciation of the saved heritage asset.	No HRA implications. This is a development management policy permitting the development of heritage assets where this secures the future conservation of a heritage asset provided it means certain criteria. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE1: Conserving and Enhancing the Natural Environment	Development should seek the protection, conservation and enhancement of the natural environment, through: - Protecting and enhancing sites designated for biodiversity or geological value; - Promoting the conservation, restoration and enhancement of priority habitats, ecological networks and green infrastructure, planning positively for people, nature and for addressing climate change taking an ecosystem services approach; - Protecting and assisting the recovery of protected species and irreplaceable habitats; - Supporting proposals that seek to conserve or enhance biodiversity as their primary objective; - Securing measurable net gains in biodiversity; - Ensuring that development maximises opportunities to help deliver the Local Nature Recovery Strategy and provide wider environmental benefits; - Ensuring the positive conservation and enhancement of the Kent Downs and High Weald national landscapes and their settings, in accordance with the relevant Management Plan; - Protecting and enhancing the borough's most valued landscapes, landscape character, soils, trees and woodland; - Seeking opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity, food production and carbon storage; - Seeking to minimise as far as possible the loss of the best and most versatile agricultural land (Grades 1, 2 and 3a) to major new development; - Ensuring that development does not contribute further to adverse air pollution levels, ground, water or light pollution and taking opportunities to make improvements where possible, and in accordance with relevant guidance, action plans and frameworks; - Supporting high-quality, well-designed development that maximises nature-based solutions and landscape led design that respects local character and contributes to establishing a strong sense of place; and - Development affecting designated sites and biodiversity assets, including protected and priority species, will apply the mitigation hierarchy as required by the NPPF.	No HRA implications. This is a positive policy requiring the council to be committed to the preservation, conservation and enhancement of the natural environment. This is a positive policy that does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE2: National Landscapes	1. All proposals within, or affecting the setting of, the Kent Downs National Landscape and the High Weald National Landscape, must conserve and enhance the natural beauty of these nationally designated landscapes.	No HRA implications. This is a positive policy requiring proposals to conserve and enhance the nationally

Policy Name	Policy Description	Screening Outcome
	2. The scale and extent of development within the National Landscapes should be limited and will only be supported where the nature of the development, location, siting, scale, form, and design would conserve and enhance the components of natural beauty of the relevant National Landscape as defined in the AONB Management Plan, including its distinctive landscape character and features, historic settlement patterns, dark skies and tranquillity, and would positively contribute to the targets, aims and objectives as defined in the relevant Management Plan, avoiding adverse impacts, unless these can be satisfactorily mitigated. 3. Development compatible with furthering the purpose of a National Landscape should apply a landscape-led approach that reflects the character and features of the National Landscape and should be of high design quality. The impact of development on views into and out of the National Landscape should also be considered. 4. Proposals will be required to submit appropriate information as part of an application to enable any impacts to be considered, taking into account the relevant Management Plan, landscape character or sensitivity assessments and any associated supporting documents and/or guidance. 5. Major development within the National Landscapes will only be supported in exceptional circumstances and where it can be demonstrated to be in the public interest. <u>Setting of the National Landscapes:</u> 6. Development within land that contributes to the setting of a National Landscape will only be permitted where: - it does not adversely affect the National Landscape's natural beauty (including dark skies and tranquillity); - It is sensitively located and designed to avoid or minimise adverse impacts on the National Landscapes; and - It is consistent with National Landscape purposes, and in particular does not adversely affect transitional landscape character in the setting of the National Landscape and views, outlook and aspect, into and out of the National Landscape by virtue of its location, scale, form or design. 7. Assessment of such development proposals should have regard to the relevant AONB Management Plan and supporting documents.	designated landscapes including by being of appropriate nature, location, siting, scale, form, and design. This is a positive policy that does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE3: Landscape Character	1. Proposals should adopt a landscape led approach and must protect and enhance the intrinsic character and quality of the landscape character area, within which development will be situated, as defined by the Tonbridge and Malling Landscape Character Assessment and the Kent Downs AONB Landscape Character Assessment Review and any other relevant guidance / information. 2. Development proposals will need to demonstrate that they have considered the following in respect of their potential impact on the landscape, including any cumulative impacts: - Landform, topography, geology and natural patterns of drainage; - The pattern and composition of trees and woodlands; - The type and composition of wildlife habitats, biodiversity and ecological character; - The pattern and composition of field boundaries; - The pattern and distribution of settlements, roads and footpaths; - The presence and pattern of historic landscape features; and - The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features.	No HRA implications. This is a positive policy requiring proposals to follow a landscape-led approach and protect and enhance the landscape character, demonstrating a the council to be committed to the preservation, conservation and enhancement of the natural environment. This is a positive policy that does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	3. Development proposals will be expected to demonstrate that they effectively prevent, reduce and mitigate any negative impacts on landscape character (in that order) as well as contribute to local character and distinctiveness, and the green infrastructure network. Where possible, planting should be informed by and contribute to landscape character and make use of native species.	
Policy NE4: Designated Sites, Irreplaceable Habitat and Priority Habitats and Species	1. Designated sites of importance for biodiversity will be safeguarded in line with the hierarchy set out in the NPPF. 2. Development proposals that will have an adverse impact on the integrity of international wildlife sites, as defined on the Policies Map, will not be supported other than in exceptional circumstances, in accordance with the NPPF. a. Development proposals that are likely to result in a significant adverse effect, either alone or in combination with other proposals, on any internationally designated site, must satisfy the requirements of the Habitats Regulations (or any superseding similar UK legislation). b. Development requiring Appropriate Assessment will only be allowed where it can be determined, taking into account mitigation, that the proposal would not result in significant adverse effects on the site's integrity. 3. Developments which would adversely affect a Site of Special Scientific Interest (SSSI) (individually or cumulatively), as defined on the Policies Map, will not be supported. a. Exceptions will only be made where the benefits of the development on the particular site clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts. b. Where an exception is considered, the mitigation hierarchy will apply. 4. Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Wildlife Site (LWS), Local Nature Reserve (LNR) or Regionally Important Geological Sites (RIGS), as defined on the Policies Map, will not be supported. In considering whether such an effect arises, the mitigation hierarchy of avoidance, mitigation and then compensation will apply. 5. The enhancement of biodiversity through the creation, enhancement and extension of designated sites locally will be supported. 6. Development should seek to conserve, restore and where possible enhance irreplaceable habitat, and priority habitats and species. 7. Development proposals directly or indirectly affecting biodiversity will be required to apply the mitigation hierarchy of avoidance, mitigation and compensation. The Council will not support development proposals where significant harm is not adequately avoided, mitigated or compensated for 8. Development proposals will need to demonstrate that biodiversity has been considered at an early stage in site identification and design to ensure that the location and/or use of land for development will not undermine designated sites, priority habitats and species and irreplaceable habitats, either directly or indirectly. 9. Opportunities to extend and buffer designated sites, irreplaceable habitats, priority habitats where applicable should be explored in order to support and implement measures within priority areas that could become of particular importance for nature recovery (as identified in the Local Nature Recovery Strategy).	No HRA implications. This is a positive policy requiring development proposals to avoid adverse effects on protected site both alone and in combination, supporting the enhancement and conservation of biodiversity, habitats and protected species. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	10. Planning applications will be expected to be supported by relevant environmental information, including protected species and habitat records, which are informed by appropriate and up-to-date ecological data/surveys. Any ecological surveys should be undertaken by suitably qualified professionals and be in line with best practice / guidance and Government standing advice.	
Policy NE5: Biodiversity Net Gain	1. All relevant new developments are required to provide a minimum of 10% biodiversity net gain (BNG) and submit a Biodiversity Gain Plan. BNG must be calculated using the relevant Statutory biodiversity metric and be secured for a minimum of 30 years after the development is completed. 2. Proposals for BNG should be delivered on-site, taking into account local green infrastructure priorities set out in the Local Nature Recovery Strategy, the Tonbridge and Malling Green and Blue Infrastructure Strategy (2024) and the Kent Biodiversity Strategy. Off-site delivery will only be considered where it can be demonstrated that, after following the mitigation hierarchy, all reasonable opportunities to achieve net gains on-site have been exhausted. 3. Where off-site biodiversity gain is proposed, the Kent and Medway Local Nature Recovery Strategy (2025), once published, should be used to guide the locations of BNG. Delivery on sites within the borough should be fully explored and evidenced prior to considering delivery on sites outside the borough. 4. Only where delivery on-site and off-site have been fully explored and evidenced will the use of statutory credits be supported. 5. Development proposals must provide sufficient BNG information to demonstrate that the BNG requirement is capable of being successfully discharged and ensure that any BNG is in addition to any mitigation or compensatory measures. This should include a draft Biodiversity Gain Plan and draft Habitat Management and Monitoring Plan that follow the DEFRA and Natural England templates which should also include the following local considerations: - The method of BNG delivery (for example on or off site); - Evidence to demonstrate that the biodiversity gain hierarchy and locational hierarchy set out in criteria 3 of this Policy has been followed; - The Statutory Biodiversity Metric should seek to align with and meet the objectives of the Kent and Medway Local Nature Recovery Strategy; - Where baseline habitat of high or very high distinctiveness is retained onsite, the draft Habitat Management and Monitoring Plan should include proposals to secure its management to ensure that no deterioration would occur that results in reduced overall BNG; 6. BNG proposals will be secured by condition and/or legal agreement with the Council or a conservation covenant with a Responsible Body. Where legal agreements are with the council this will include a requirement to cover the Council's costs associated with the long-term monitoring of the BNG delivery. 7. BNG that helps deliver nature-based solutions for climate change as well as biodiversity loss, such as the restoration and creation of ecosystems to protect communities from flooding or increasing carbon sequestration, will be encouraged.	No HRA implications. This is a positive policy requiring development proposals to provide biodiversity net gain and requiring this enhancement to be located on site where feasible. This policy also requires development to demonstrate the BNG delivery will be achieved in addition to any mitigation or compensatory measures. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE6: Green and Blue Infrastructure	1. New development proposals must ensure that the loss of existing new green and blue infrastructure is avoided, and that new green and blue infrastructure is considered and integrated into scheme design from the	No HRA implications. This is a positive policy requiring development proposals to avoid the

Policy Name	Policy Description	Screening Outcome
	outset. The loss of existing wildlife rich corridors and stepping stones, should be avoided. 2. Proposals that cause loss or harm to existing green or blue infrastructure assets, as identified in the Tonbridge and Malling Green and Blue Infrastructure Strategy (2024), will not be supported unless: - The need for and benefits of the development demonstrably outweigh any adverse impacts. - Where adverse impacts on green and blue infrastructure are unavoidable, development will only be supported if suitable mitigation and/or compensation measures for the network are provided in line with the mitigation hierarchy. 3. The design and layout of new green and blue infrastructure should: - Take opportunities to incorporate a range of spaces, green routes and environmental features including footpaths, urban greening, green walls/green roofs and landscape features that contribute to public amenity, that are appropriate to the development and reinforce the wider green and blue infrastructure network; - Deliver biodiversity net gain and support ecosystem services in support of the Local Nature Recovery Strategy; - Minimise any indirect adverse effects on habitats and species including those relating to recreation, lighting, disturbance, water quality, pollution or invasive species. - Have due regard to landscape/ townscape and historic character and contribute to establishing a strong sense of place; - Support climate change adaptation and resilience for both people and nature including through use of appropriate habitats and climate resilient species to provide opportunities for species migration, and the use of new tree planting to facilitate shading and cooling; - Encourage healthy, inclusive and safe places to maximise the delivery of green infrastructure benefits; and - Comply with Natural England's Green Infrastructure Standards. 4. Where new or enhanced green and blue infrastructure is proposed, details of appropriate species selection and long-term management and maintenance must be provided. 5. Planning applications will be expected to be supported by relevant environmental information, which is informed by appropriate and up-to-date ecological data/surveys. Any ecological surveys should be undertaken by suitably qualified professionals and be in line with best practice / guidance and Government standing advice. 5. Where major development involving the provision of housing is proposed on land released from the Green Belt, new or improvements to existing green spaces that are accessible to the public, in accordance with Policy SP8 should support the green and blue infrastructure network of the borough.	loss of green and blue infrastructure, clarifies what new green and blue infrastructure should do. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE7: Woodland Trees and Hedgerows	1. Development proposals will be supported where they protect, restore, manage, enhance and supplement existing woodland, trees and hedgerows in accordance with best practice guidance and relevant standing advice. 2. New trees, woodland and hedgerows should be located to enhance and restore biodiversity to support the Kent and Medway Nature Recovery Strategy outcomes, landscape character, visual amenity, the green and blue infrastructure network including that set out in the Tonbridge and Malling Green and Blue Infrastructure Strategy, facilitate climate change mitigation and adaptation and enhance biodiversity. Any planting should be characteristic of the local area, in keeping with the site surroundings, including any historic context, and comprise of a diverse range and mixture of climate resilient and native species. 3. Development proposals will be supported where existing woodland, hedgerows and trees are taken account of and integrated into the design of development with long-term sustainable relationships being achieved. Proposals which would affect woodlands, trees and/or hedges within the	No HRA implications. This is a positive policy requiring development proposals to protect woodlands, trees and hedgerows, and giving guidance regarding new trees, woodlands, and hedgerows and incorporating this into development proposals. This policy does not control either the quantum or location of new development. There are no linking

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	application site or on land adjacent to the site (including street trees), will need to be supported by a survey showing the trees/hedges and providing details of protection measures. Tree surveys and details of tree/hedge protection measures should be prepared by a suitably qualified arboriculturist in accordance with the recommendations of BS5837: 2012: Trees in Relation to Design, Demolition and Construction (or subsequently updated version of that Standard) and the requirements of the Validation Checklist. Sufficient evidence and measures, with allowance for future growth and maintenance requirements, must be provided to ensure protection from any likely impacts from development, including, but not limited to, access and provision of services. 4. Proposals should incorporate trees within the design and layout of development within both urban and rural areas, including tree-lined streets, to enhance the amenity of the public realm as well as providing climate change adaptation and mitigation benefits. 5. Proposals will need to demonstrate that sufficient measures can be implemented to protect trees, woodland and hedgerows both during and for the lifetime of the development to achieve current and long-term sustainable relationships. 6. Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in wholly exceptional circumstances, where the public benefit would clearly outweigh the loss or deterioration, and where a suitable compensation strategy exists.	impact pathways present.
Policy NE8: Best and Most Versatile Land	1. The council will seek to protect the best and most versatile (BMV) agricultural land from development. 2. Planning applications that would result in the loss of BMV land will be expected to justify why the loss of the agricultural land is acceptable and assess its value and wider contribution in terms of farming resources, food production, natural capital and ecosystem services. 3. Applicants will be required to submit information on the status of a site which will be used alongside other material considerations for the purposes of determining planning applications. 4. Proposals for development on land indicated as containing any BMV land will need to be supported by a detailed and up to date survey and evaluation of soil types. 5. Overall, applicants should seek to use areas of poorer quality agricultural land in preference to that of higher quality, except where this would be inconsistent with other sustainability objectives. 6. In exceptional circumstances, where development is permitted on BMV land, applicants will be required to submit details to show how disturbance to soils will be minimised to protect soil biodiversity during construction. 7.	No HRA implications. This is a development management policy seeking to protect the best and most versatile agricultural land. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE9: Noise, Vibration and Obour	1. All development proposals should minimise, and where possible reduce noise, vibration, and odour pollution and ensure that the development is appropriate for its location when considered alone and cumulatively. 2. The following receptors will be protected from unacceptable levels of noise, vibration and odour pollution, as relevant. a. National Landscapes b. Designated nature conservation sites c. Historic environments d. Occupants of residential development e. Other sensitive receptors including schools, nurseries, hospitals, care facilities, areas used for amenity or recreation. 3. Development will only be permitted, if applicants can demonstrate that their development will not result in unacceptable	No likely Significant Effects This is a positive policy that seeks to minimise noise, vibration and odour from polluting various receptors including designated nature conservation sites, with a requirement for sufficient mitigation where necessary. This policy does not control either the quantum or location of

Policy Name	Policy Description	Screening Outcome
	pollution levels having regard to the relevant British Standards and other relevant national guidance and good practice. 4. Development proposals will be required to identify any likely impacts arising from the proposed development on existing nearby sensitive receptors and where an impact is likely will be required to submit an assessment that meets the relevant requirements and / or standards. The Assessment must be undertaken by a suitably qualified person and consider the relationship in detail. 5. Where an adverse impact is identified, applicants must demonstrate how the proposed development will be designed and implemented to prevent, avoid and mitigate the adverse impact. Planning applications will not be supported where adverse impacts cannot be mitigated to the satisfaction of the Council.	new development. There are no linking impact pathways present.
Policy NE10: Air Quality	1. Development proposals should seek to improve air quality and reduce the effects of poor air quality by minimising exposure to air pollution and assist in facilitating compliance with relevant limit values and/or national objectives for air pollutants. 2. Where air quality issues are anticipated submission of an air quality assessment is required to determine whether the predicted impact of a development on local air quality would adversely affect public health and / or the local environment and to identify appropriate mitigation. Where an Air Quality Assessment identifies potential significant adverse impacts on sensitive receptors from any source, the applicant must detail the appropriate avoidance and mitigation measures that will be implemented to prevent the identified impacts, including impacts on future occupiers or users of the site. Major developments will require an emissions mitigation assessment to be submitted. 3. Development, either individually or cumulatively with other existing or proposed uses in the vicinity that could directly or indirectly result in a significant deterioration in air quality levels within the development locality will not be permitted unless specific, identified and acceptable measures to offset or mitigate those impacts are introduced as part of the development. 4. In relation to declared Air Quality Management Areas (AQMA), and any areas in the process of becoming a declared AQMA at the time of application, [as shown on the DEFRA UK AIR AQMA interactive map] development will not be permitted where new receptors would be introduced into an area of poor air quality unless the proposals incorporate acceptable measures to ensure those receptors would not be subject to unacceptable risks as a result of poor air quality. 5. Proposals that will result in National Air Quality Objectives being exceeded will not be supported. 6. Development shall safeguard ecology, local wildlife and habitats and those development proposals, [alone or in combination] that are anticipated to have an impact on an internationally designated site will be subject to a Habitats Regulations Assessment. 7. Mitigation measures on a scheme will be secured through planning condition and / or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.	No likely Significant Effects This is a positive policy that requires development to seek to improve air quality, meet national standards and Air Quality Management Areas, and where needed provide Air Quality assessments and potentially mitigation measures. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE11: Ground Contamination	1. Development proposals located on or near sites which have previously been used for activities which pose a risk of land contamination shall be informed by a contaminated land desktop study identifying all previous site uses, potential contaminations associated with those uses including a survey of the condition of any existing building(s), a conceptual model of the site indicating sources, pathways and receptors and any potential unacceptable risks to human health and the local environment arising from contamination at the site. 2. Where contamination is identified, development proposals must incorporate a detailed strategy for site investigation works, along with details of any site clearance, ground investigations or site survey work that may be required to	No likely Significant Effects This is a development management policy that requires development to seek to minimise noise, vibration and odour from polluting various receptors including designated nature conservation sites, with a requirement for

Policy Name	Policy Description	Screening Outcome
	allow for intrusive investigations to be undertaken to inform a risk assessment of the degree and nature of any contamination on site and the impact on human health, controlled waters and the wider environment. 3. Development will be supported if it can be demonstrated, having regard to the other relevant policies in the Local Plan, that any contamination can be effectively addressed in a manner that ensures the site would be suitable for its end use through remediation measures.	sufficient mitigation where necessary. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy NE12: Light Pollution	1. All new development will be supported which does not lead to significant levels of light pollution on the natural and built environment (including cumulative impacts). 2. Development will only be permitted, if it can be demonstrated, having regard to the relevant British Standards, Institute of Lighting Professionals and good practice, that it is located and designed to minimise the impact of light pollution on the locality and amenities of residents to an acceptable level and have due regard to the following: - Developments located within the Kent Downs and High Weald National Landscapes and their setting, will be required to propose lighting that conserves the dark skies and/or character of that National Landscape; - The type and level of lighting would not adversely impact upon wildlife, habitats, the historic environment, heritage assets and their settings or the wider countryside and rural character; and - The lighting is energy efficient and utilises low energy bulbs/LED's where possible and has control mechanisms to dim or switch off the external lighting when not needed. 3. Where lighting issues are anticipated the submission of a light assessment (that accords with the Institute of Lighting Professionals) should accompany the application and detailed mitigation measures as part of the planning application process.	No likely significant effects This is a positive policy that requires development to consider the impacts of light pollution on the natural and built environment, with an assessment required where issues are anticipated. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy D1: Achieving High Quality Design	1. All development in the borough must incorporate principles of good design, be of the highest quality, and create inclusive, attractive places which promote a sense of place, pay regard to local distinctiveness and character and contribute to health and wellbeing. 2. Design must be considered at the earliest opportunity, having regard to national and local design guidance (including The Kent Design Guide), relevant design guides and Design Codes 3. Major applications will be expected to demonstrate early, proactive and effective engagement with the community on design issues, where appropriate and as advised via any pre-application discussions. 4. Development proposals will be supported where they: <u>Context and Identity</u> - Are locally distinctive, respond cohesively and create a positive sense of place by demonstrating a thorough understanding of the context and character of an area, including but not limited to, important views, topography, landscape and landscape features, townscape, form, details, materials, scale, skyline and heritage; - Respond positively to the scale, density, grain, massing and rhythm of the area; and - Are visually attractive and demonstrate a well-considered design response within the proposed elevational design, architectural detailing and use of local, traditional and high quality materials. <u>Built Form and Layout</u> - Promote inclusive design; - Demonstrate that they meet the government's latest Nationally Described Space Standard in respect of internal accommodation, clearly setting out the floor area, number of dwelling storeys, the number of beds and built in storage area for each dwelling typology; - Make efficient use of land with sustainability at the heart, with ease of access to local public transport, facilities and services; - Incorporate way finding by using landmarks, vistas, destinations and focal points	No likely significant effects. This is a design management policy requiring development to adhere to local and national design guidance and meet a range of requirements covering the context and identity, Built form and layout, transportation requirements and lifespan considerations of the development. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	h) Be of an appropriate density for the area. Higher density development will be encouraged in sustainable and accessible locations where this is appropriate and is complementary to prevailing character. Lower density development may be appropriate in edge-of-settlement locations. Overall, density should be optimised in a way that accounts for the type of development required to meet the borough's needs, whilst also taking account of the character of the area; i) Make a positive contribution to the visual harmony of the area; j) Are designed to avoid unacceptable adverse impacts or harm to the amenities of neighbouring properties and their users /occupants in terms of privacy, sunlight and daylight, overbearing, noise, odour, traffic and vibration; k) have regard to 'Building for a Healthy Life' and National Space Standards; l) Where appropriate, provide high quality multi-functional green open spaces and public spaces, ensuring that open spaces are designed to be resilient to climate change and adaptable over time; m) Support habitat conservation and creation for wildlife and maximise opportunities for Biodiversity Net Gain, including incorporating tree lined streets and other planting; n) Make appropriate and visually attractive provision for service areas, refuse storage (including waste and recycling bins) and collection areas; <u>Movement</u> o) Ensure easy navigation through a clear hierarchy of street and routes that are of appropriate widths and that ensure inclusivity and accessibility; p) Are well connected in transport terms and integrate well into the existing network; q) Provide high quality pedestrian and cycle infrastructure including PRoW connections and prioritise safe and sustainable transport choices; r) Consider walkable neighbourhood and the prioritisation of people over cars, including looking to reduce vehicle speeds; s) Provide vehicle and cycle parking and charging points in an attractive way that is well integrated and does not dominate or clutter the street scene or detract from the public realm, and responds to local character and design standards; and t) Ensure safe access/egress from development and at each collection point for service vehicles (including appropriate turning areas), paying regard to published Council guidance. <u>Lifespan</u> u) Are designed to be adaptable to changing/evolving needs and to facilitate opportunities for home working v) Are designed to last, adding to the overall quality of the area utilising local and traditional materials; 5. Development should, where practicable and proportionate, be designed to: a. deter crime and reduce the fear of crime, paying regard to the principles set out in Secured by Design; b. maximise opportunities for healthy active lifestyle choices; and d. reduce overheating and regulate the internal temperature of buildings through building form, orientation, passive ventilation and cooling, landscaping, urban greening and street trees, shading mechanisms, external colouring and green roofs and living walls.	
Policy D2: Design Codes and Masterplans	1. The council will require the submission of a masterplan for all sites of 100 or more dwellings, or sites for significant non-residential development (such as large-scale employment or mixed uses), submitted in either full or outline. Such masterplans must be informed by best practice, and a thorough understanding of the site and the area and comply with the	No likely significant effects This is a design management policy requiring large sites to

Policy Name	Policy Description	Screening Outcome
	principles set out within Policy DM1. For proposals of less than 100 dwellings, the submission of a masterplan is recommended. 2. Design Codes will be developed for large key sites as identified in the spatial strategy and on the Proposals Map. On large scale strategic sites of 500 or more dwellings the council will require Design Codes (in addition to masterplans). Design Codes are encouraged for developments of 100 or more dwellings or in relation to specific development types. The Council will work collaboratively with site promoters in developing these. These will provide a framework for creating places that deliver high-quality and sustainable design. 3. For larger schemes proposing 500 or more dwellings, or where significant design implications are identified, these applications will be referred to a Design Review Panel. 4. Design Codes will specifically be required for self-build or custom build projects proposing 5 or more units, to encourage a coordinated approach to the design and development of individual plots 5. New development and redevelopment will be expected to adhere to the requirements and provisions set out in design codes and design guides 6. Preparation will consider the advice contained in National Planning Policy, the National Design Guide and the National Model Design Code as well as other evolving good design practice 7. Design Codes and masterplans will reflect local aspirations and be informed by community engagement	provide masterplans and design codes. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R1: Rural Exception Sites	1. Small scale residential development in rural areas outside the settlement confines may be permitted where they are consistent with all other Local Plan policies, accord with national Green Belt policy and meet all the following criteria: a. The site is identified to meet unmet local housing need either within the Parish or an adjacent Parish that cannot be located elsewhere and as evidenced by an up-to-date and robust housing needs survey; b. The exception site is adjacent to an existing settlement or an existing sustainable location near a settlement confine; c. The proposed development reflects the required housing need in terms of appropriate size, type, tenure, mix and price, is of high-quality design and in keeping with the character of any adjoining development and the locality; d. The affordable homes are of the same or similar design to any of the market homes that may be allowed in terms of scale and number of bedrooms; e. The development provides suitable and safe access and parking; f. The homes are secured as affordable homes in perpetuity, through a Legal Agreement to ensure that the housing remains available to meet the affordable housing needs of local people; and g. The proposal does not include mixed uses. 2. Proposals that require a small element of market housing to enable the delivery of affordable homes will only be permitted where a viability assessment confirms that the need for market housing is necessary. The scheme will be subject to an independent viability assessment, the costs of which will be paid for by the applicant. The minimum amount of market housing will be supported to ensure that the primary purpose of the development is to deliver affordable homes.	No HRA implications This policy does not promote a quantum or location of growth
Policy R2: Housing for Rural Workers	1. Housing for rural workers will be permitted outside settlement confines where the following criteria is met: a. The proposal is in accordance with national Green Belt policy where relevant; b. That there is an essential occupational or functional need for a full-time worker to live permanently at the site or due to the nature of the business requires to be at the site most times; c. That suitable accommodation, either for sale or rent, cannot be found via existing housing in a nearby settlement	No likely significant effects This is a development management policy controlling the development of housing for rural workers outside of existing settlement boundaries.

Policy Name	Policy Description	Screening Outcome
	or location or at the existing site through existing buildings or conversion of existing buildings; d. The business has been operating for a minimum of three years and the business is likely to remain financially viable for the foreseeable future; e. All permanent housing should be of a size that is commensurate with the established functional requirement and sited as close as possible to existing buildings; f. All housing will comply with minimum health standards; and g. All proposals will provide the necessary services to serve the dwellings including access, hardstanding, drainage and ventilation. 2. Evidence submitted on financial viability will be subject to an independent assessment by the Council's appointed consultant, of which, the costs for the independent assessment will be paid for by the applicant. 3. If a new dwelling is essential to support new or existing farming activity, in the first three years of business or criteria 1a-c is not sufficiently demonstrated, then temporary accommodation may be permitted in locations where rural worker's accommodation is considered suitable. The temporary accommodation structures will be subject to temporary occupancy conditions to ensure its use as rural workers accommodation. Planning conditions shall be used to limit the duration of the proposed use up to three years. After three years, 1a-c will need to be demonstrated should permanent rural workers accommodation be required. 4. Both permanent and temporary accommodation will be subject to an occupancy condition, limiting its use for occupation to people employed as a rural worker. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place. In addition, where appropriate, permission may be subject to a legal agreement preventing the future separation of farmhouses from any adjoining farm buildings/land. 5. Permitted development rights will be removed for rural workers dwellings to ensure that the dwelling remains of a size commensurate to the needs of the business. Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works. Temporary or seasonal accommodation requirements to serve rural enterprises will be considered on a case-by-case basis.	This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R3: Replacement Dwellings Outside Settlement Confines	1. Replacement dwellings outside settlement confines will be supported where the following criteria are met: a. Replacement dwellings will be on a 'one for one' basis and will only be supported where it can be demonstrated that the property benefits from a lawful residential use and the use has not been 'abandoned'; b. The replacement dwelling is of a comparable size and scale to the existing dwelling and can be accommodated appropriately within the footprint of the existing dwelling, unless there are clear benefits from locating the replacement dwelling in an alternative position e.g. landscape, heritage, local amenity. Where the latter is applicable, then the dwelling must be located within the curtilage of the existing dwelling; c. The dwelling which is to be replaced is demolished within three months of first occupation of the new dwelling; d. The design of the replacement dwelling is in keeping with the character of the area and is sympathetic to its setting in terms of form and massing and is no more visually intrusive than the existing dwelling; e. The replacement dwelling provides suitable access, parking and amenity space without harming the living conditions of nearby residents or adversely impact other nearby uses; and f. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy.	No likely significant effects This is a development management policy controlling the replacement of existing dwellings outside of existing settlement boundaries. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R4: Conversion of an Existing Building to Residential Use	1. The conversion or sub-division of an existing building to residential use outside settlement confines will only be supported where the proposal is sufficiently justified and where the following criteria are met:	No likely significant effects This is a development management policy

Policy Name	Policy Description	Screening Outcome
Outside Settlement Confines	a. It has been demonstrated through the submission of information alongside the application that the existing use / operation of the building or business use of the building has been continually, actively and effectively marketed at an appropriate rate for a minimum of 12 months with a specialist agent; b. The building is proven, by the submission of a structural survey, that it is structurally sound, permanent and of substantial construction to facilitate conversion or sub-division to residential use; c. That the building can achieve conversion or sub-division without requiring extension or alteration including new buildings. d. Residents of the existing building would be able to safely access sustainable transport options to access services and facilities in a nearby settlement; e. Any curtilage of the dwelling shall be restricted to that which is necessary to facilitate parking or provide a reasonable level of amenity garden space; f. The proposal does not have an adverse effect on the character, appearance or features that are of architectural or of historic interest including its setting; and g. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy.	controlling the conversion of existing buildings outside of existing settlement boundaries for residential use. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R5: Residential Parks	1. Proposals for new caravans will be permitted within settlement confines or where small-scale extensions to existing sites can contribute to meeting the Council's housing need, providing the following criteria are met: a. The proposal is sympathetic to the existing surroundings in scale, siting, design characteristics and in relation to the amenity of neighbouring properties; b. The proposal would not have an adverse impact on local character or the amenities of adjoining sites or settlements; c. The proposal includes safe vehicular and pedestrian access, storage areas for waste and recycling and sufficient parking arrangements; d. Adequate services and utilities are provided and the site has good accessibility by sustainable modes of transport to a sustainable settlement; e. It can be demonstrated that there will be no unacceptable adverse effect on the character or appearance of the countryside, residential amenities, traffic conditions or public safety; and f. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy. - g.	No likely significant effects This is a development management policy controlling the development of new caravans within existing settlement boundaries. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R6: Employment Development Outside Existing Settlement Confines	<u>Intensification or extension of existing employment development</u> 1. Proposals for the intensification or extension of employment development within the existing operational site boundaries of an employment site will be supported outside settlement confines where: a. A need is demonstrated to facilitate new or expanding operational functions; or b. It can be demonstrated that the business premises is operating at full occupancy or near to it. 2. Where a need is demonstrated, a proposal will only be supported where: a. It is of a scale that is consistent with the proposed use and the existing size and scale of the site and also is acceptable taking into account the character of the area; b. It would not prejudice existing uses at the site by way of any increase in proposed operations; c. It can be demonstrated that all options to re-use or adapt existing buildings within the site have been considered and prioritised, with extensions or new buildings only being proposed where re-use or adaption of existing buildings is not viable or practical; d. The proposal would not generate an inappropriate amount or type of additional traffic movements and the site's existing vehicular access and parking provision is suitable or can be made suitable.	No likely significant effects This is a development management policy controlling the intensification or extension of employment development, including the re-use of existing rural buildings for business use. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	e. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy. <u>Re-use of existing rural buildings for business use</u> 3. Development proposals that seek to re-use, convert or adapt existing redundant rural buildings for business use that are currently or were last used for employment use will only be supported where: a. A rural location for the type of business can be justified and sustained, without the requirement of further rural buildings to facilitate its use; b. The business will positively contribute to the rural economy through the provision of local employment opportunities; c. The building is permanent and structurally sound and capable of re-use, conversion or adaptation without major re-building, alterations or extensions; d. The building is not required for agricultural purposes both now or in the future; e. The development makes an efficient and viable use of a building that would otherwise remain redundant; and f. The proposal would not harm the openness and character of the Green Belt in terms of scale, location and design and complies with national Green Belt policy.	
Policy R7: Agriculture, Forestry and Horticulture	1. Development proposals for new buildings or structures for the purpose of agriculture, forestry, horticulture and other rural land based uses including agricultural diversification will be supported where the following criteria are met: a. A robust business case is provided that demonstrates the operational need for the development at the scale and location proposed; b. It can be demonstrated that all options to re-use or adapt/convert existing buildings within the site have been considered and prioritised first, with new buildings or structures only being proposed where re-use or adaption / conversion of existing buildings is not viable or practical; Where this is not viable or practical, the new building or structure should be sited in or adjacent to an existing group of buildings, retain the agricultural character of the site and be of an appropriate scale and design; c. The design and / or location of the building respects rural distinctiveness and farmstead groupings, where applicable with location also reflecting the buildings proposed rural use; d. Any outdoor storage is provided as an ancillary element of other uses; and e. Where temporary coverings or polytunnels are needed, they should be capable of being completely removed from site when not required and when out of season. This may be a condition of any planning permission granted.	No likely significant effects This is a development management policy controlling the development of new buildings and structures for rural land use purposes including agriculture, forestry, and horticulture. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy R8: Farm Diversification	1. Development proposals relating to farm diversification will be supported where the following criteria are met: a. A diversification plan is submitted, which demonstrates that the proposed development is necessary to support the continued viability of the existing agricultural business and will provide long-term benefit to the agricultural business; b. Diversification activities will remain ancillary to the primary agricultural business; c. The development will contribute to the rural economy through the provision of local employment opportunities; d. The proposal prioritises the use of existing buildings, infrastructure, utilities, parking and vehicular access, with new buildings and associated facilities and access only being proposed where the use of existing is not viable or practical; Where this is not viable or practical, development should be sited in or adjacent to an existing group of buildings, retain the agricultural character of the site and be of an appropriate scale and design; e. The design and / or location of the building respects rural distinctiveness and farmstead groupings, where applicable, with location also reflecting the buildings proposed rural use; f. Development is restricted to the minimum level reasonably required for the operation of the diversified business;	No likely significant effects This is a development management policy controlling the development of facilities for farm diversification. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	g. The proposal will avoid the loss of the best and most versatile agricultural land, where possible; h. The diversified activities are sensitive to the character of their rural setting and the nature of the business will not adversely affect local amenity; i. The proposal would not generate an inappropriate amount or type of additional traffic movements and the site's existing vehicular access and parking provision is suitable or can be made suitable; and j. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy. <u>Farm shops</u> 2. Where farm diversification relates to farm shops or extensions to farm shops, developments will generally be supported provided that it meets the above requirements and: a. The shop relates to and will be ancillary to the existing rural business; b. The scale and scope of the business will not harm the accessible convenience retail offer available to the community in the surrounding area; c. The produce sold in the farm shop aims to sell: i. A minimum of 40% of products or produce from that produced on the premises or holding; ii. 30 % or more from the Kent region; and iii. The remainder being sourced from the Southeast region. 3. Where appropriate, the council may impose conditions to control the future expansion or nature of the farm diversification business including farm shops when granting planning permission. New farm shops will likely be restricted to Use Class E(a) retail with ancillary Use Class E(b) food and drink.	
Policy R9: Sustainable Tourism and Visitor Accommodation	1. New tourism facilities, including visitor accommodation⁵⁶ or improvements and extensions to existing tourism or visitor accommodation facilities will be supported where the following can be demonstrated: a. The proposal is located within settlement confines or where the proposal relates to tourism facilities it can justify why the proposal would not be suitable to be located within settlement confines. b. The proposal meets an identified and evidenced demand for the facilities or accommodation, positively contributing to tourism in the borough and does not detract from the vitality and viability of town or village centres and other local facilities; c. The proposal closely relates to or is closely associated to an existing visitor attraction or tourism use that is seeking to expand, contributing to the retention or enhancement of existing facilities and the tourism offer; d. The location of the proposal is accessible using sustainable modes of transport including walking, cycling and wheeling; e. The proposal would not generate an inappropriate amount or type of additional traffic movements and the site's existing vehicular access and parking provision is suitable or can be made suitable; f. The proposal, either alone or cumulatively with other tourism or visitor uses in the area, will not detract from the experience of visitors or adversely affect the character, historical significance, landscape, natural environment, appearance or amenity of the area; g. The proposal makes best use of existing buildings and structures. Where new structures or buildings are demonstrated to be necessary, these must relate physically and functionally to existing buildings or structures associated with the enterprise and be of an appropriate design and scale; h. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy 2. Development proposals that would result in a loss of tourist facilities and / or visitor accommodation to alternative uses will need to be considered in line with Policy R9.	No likely significant effects. This is a development management policy supporting the development of new visitor facilities provided they meet a range of criteria including meeting demand, being located within settlement confines and not causing harm to the openness or character of the green belt. This policy does not control the quantum of new development. While tourism development can result in likely significant effects this policy specifically supports sustainable tourism; tourism which harmed Habitats sites would not be sustainable and would therefore not be supported. Therefore, there are no linking impact pathways present. It is noted that any development brought forward under this assessment would need to be assessed

Policy Name	Policy Description	Screening Outcome
	3. Where proposals for temporary structures such as yurts, glamping pods, towing caravans are acceptable in relation to this and other relevant policies in the plan, then a condition or legal agreement may require removal from site when not required and when out of season. 4. The occupation of any new tourist accommodation will be restricted via condition or legal agreement to ensure it is a tourist use solely and not for permanent residential occupation.	for likely significant effects.
Policy R10: Equestrian Facilities in the Countryside	Proposals for appropriate equestrian facilities in the countryside should have regard to the Tonbridge and Malling Landscape Character Assessment, the National Landscape Management Plans and national Green Belt policy where relevant, and should ensure that; a. It can be demonstrated that all options to re-use or adapt/convert existing buildings within the site have been considered and prioritised first, with new buildings or structures only being proposed where re-use or adaption / conversion of existing buildings is not viable or practical; b. the scale of the facility is no more than is reasonably required for the proper functioning of the enterprise or the use of the land to which it is associated; c. the facility is unobtrusively located and designed so as not to introduce a prominent urban element into a countryside location, including the impact of any new or improved access and car parking areas; d. the proposal will not lead to significant increases in light pollution in accordance with Policy NE13; e. in the case of all-weather riding arenas or other facilities for the exercising of horses, the degree of engineering operation required and the resultant re-grading of land, including any earth mounding and retaining structures, does not result in incongruous or discordant landform out of character with its setting that cannot be mitigated through the use of appropriate hard and soft landscape techniques. Structures, engineering works and buildings serving equine uses should be removed from the site when they are no longer in use and are no longer required to serve the equine use of the land. Sufficient grazing land for horses will also be required to be available; f. the proposal does not generate traffic of a type or amount inappropriate for rural roads or would impact the character of the rural roads; and g. the proposal would not result in ground contamination or pollution risk associated with waste and will be accompanied by a waste management plan. h. Where the proposal is located in the Green Belt, it accords with Policy SP8 and national Green Belt policy.	No likely significant effects This is a development management policy controlling the development of equestrian facilities in the countryside. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy Strategic Change	CC1: 1. Development proposals, as relevant to their nature and scale, will need to demonstrate that a proactive and best practice approach has been taken to mitigate climate change, contribute towards reducing greenhouse gas emissions and the transition to net zero and also maximise the use of measures to adapt to climate change. Innovative and creative solutions to mitigating and adapting to climate change as well as contributing to climate change resilience are encouraged. Overall, developments must contribute to net zero through a holistic approach to design, construction, energy efficiency and on-site renewable generation to achieve as close to a net zero energy balance as possible for the type of development. 2. For climate change mitigation, such measures may include the following: a) Maximising the re-use of previously developed land and land in sustainable locations where there is supporting infrastructure in place and good access or connections to services and facilities and sustainable transport modes; b) Reducing reliance on private vehicles and the emissions associated with transport while promoting sustainable forms of travel including cycling and walking; c) The re-use or retrofitting of appropriate existing buildings and improvements to building standards and the surrounding environment (i) to reduce whole lifecycle carbon emissions compared to that which would result from demolition, and (ii) to generally maximise opportunities in addressing climate change; d) Delivering low carbon development maximising opportunities such as renewable energy, low carbon energy generation and storage, active travel and green infrastructure;	No likely significant effects This is a development management policy which requires development to demonstrate measures to mitigate climate change, and adaptation for climate change. This includes an energy and climate change statement for major development. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	e) Ensuring development supports a circular economy including the re-use of building materials, minimising embodied carbon and minimising construction waste; f) Reducing the amount of energy used in the construction and use of buildings and improving energy efficiency in accordance with the energy hierarchy set out in policy CC4; g) Designing development that is sustainable including considerations around landscaping, density, layout that encourages sustainable transport, building types, shapes, building materials and orientation in order to minimise energy consumption and maximise solar energy generation; and h) Maximising opportunities to promote and deliver carbon sequestration / storage including tree planting as appropriate. 3. For climate change adaptation and resilience, this may include: a) Taking account of flood risk and reducing the impact of flooding from all sources through location and design; b) Supporting natural flood management and retaining space for flood management where necessary; c) Incorporating sustainable drainage systems (SuDS); d) Incorporate green infrastructure, delivering multi-functional benefits including that which supports biodiversity and wildlife resilience; e) Reducing water use and increasing rain and grey water harvesting; f) Designing development to reduce the potential for overheating through passive cooling, heating and ventilation measures; and g) Avoiding or minimising light, water, air and noise pollution and improving or maintaining air and water quality. 4. Climate change mitigation and adaptation measures are key to delivering sustainable development and must therefore be considered at the beginning of the design process. Major development proposals will be required to be accompanied at the planning application stage with an energy and climate change statement which demonstrates how the above principles have been considered and implemented in the development, where applicable. The level of information provided should be proportionate to the scale and the nature of the development proposed. For minor development matters the design and access statement must demonstrate how climate change principles have been met.	
Policy CC2: Circular Economy	1. Relevant Development proposals including all relevant major development where there are existing buildings and / or structures present should incorporate circular economy principles, prioritising the retention and refurbishment of existing building stock and reducing waste, using sustainable materials and maximising opportunities to achieve a goal of net zero waste to landfill. 2. For all major developments, a circular economy statement shall be submitted and / or included as part of the energy and climate change statement required under policy CC1 demonstrating that all possible measures have been taken to retain and reuse existing buildings and construction materials, including how the development meets the following circular economy principles: a) Building in layers; b) Designing out waste; c) Building for longevity; d) Building for adaptability or flexibility; e) Designing for disassembly; and f) Using systems, elements or materials that can be reused and recycled. 3. Developments shall be designed to: a) Minimise the production of waste arising from construction, demolition and excavation and manage any such waste in accordance with the waste hierarchy and best practice waste management procedures; b) Promote the recycling of materials and use of sustainably sourced materials; and c) Demonstrate a preference towards retaining, refurbishing and reusing existing structures and buildings incorporating the retrofitting of low carbon and renewable energy and heat technology to existing buildings where feasible and viable. 4. Change of use and conversion of historic buildings shall be carried out in accordance with the Historic England Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency or any subsequent updates to this note.	No likely significant effects. This is a development management policy requiring development to incorporate circular economy principles where there are existing buildings or structures. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
Policy CC3: Sustainable Design and Construction	1. Development proposals will be supported where they demonstrate compliance with the principles of sustainable design and construction as set out below, to help mitigate and adapt to the effects of climate change; a) A Whole Life Cycle Carbon Assessment (WLCA) must be submitted for all new major development. The WLCA must follow recognised methodologies and include embodied carbon, operational carbon, end of life carbon and module D. WLCA must be submitted at the planning application stage and applications may be refused without an adequate WLCA or where insufficient design or mitigation is proposed. b) Prioritisation of brownfield land and reuse of existing buildings, structures and materials where available and feasible, minimising waste and maximising reuse of recycled materials during construction and designing for the reuse of materials at end-of-life strategy in accordance with Circular Economy policy CC2; c) Makes efficient use of land and natural energy sources and conserve on site natural resources including vegetation, soil, water and materials; d) Use construction materials that have high environmental performance ratings including high thermal performance materials for walls, floors, roofs and glazing, to minimise the impacts upon the environment and reduce energy demands; e) Constructed using low embodied carbon and energy efficient materials that should, where possible, be locally sourced. Use of traditional construction techniques and local labour and skills where available. The use of building materials with high embodied carbon, such as concrete, should be kept to a minimum, as appropriate to the character and scale of the development. The Energy and Climate Change Statement should state clearly how the choice of materials has balanced durability with reducing embodied carbon, where appropriate; f) Maximise the use of renewable and low carbon energy and heating systems in accordance with the energy hierarchy set out in policy CC3, utilising opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy sources; g) Maximise the reduction in the use of water supplies and increase water recycling. 2. Development should be designed to regulate the internal air quality and temperature of buildings and mitigate against potential overheating. Overheating mitigation measures should be incorporated into the design of the scheme and considered at an early stage. 3. All new development shall be designed to follow the cooling hierarchy: a) Reduce the amount of heat entering a building through building form and fabric, orientation and shading and the provision of green infrastructure; b) Minimise internal heat generation through energy efficient design; c) Manage the heat within the building through exposed internal thermal mass; d) Provide passive ventilation; e) Provide mechanical ventilation; and f) Provide active cooling systems only if this is demonstrated to be essential. 4. In accordance with policy CC1 above, major developments will be required to demonstrate within their Energy and Climate change statement how their development actively addresses these principles of sustainable design and construction. Minor developments will be required to address relevant matters in the Design and Access Statement.	No likely significant effects. This is a development management policy requiring development to incorporate sustainable design and constructions measures, including consideration of carbon impacts from development, a design that regulates internal temperature and air quality and adherence to the cooling hierarchy. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy CC4: Energy & Heating	1. All development proposals should follow the below energy hierarchy in developing an energy strategy and should demonstrate this within the energy and climate change statement: a) Reduce energy demands; b) Use energy efficiently; c) Generate and store renewable energy; and d) Monitor energy use. 2. Measures should be incorporated at the earliest design stage of development and maintained throughout design, construction and operation of the proposal so that opportunities to maximise compatibility with current and future use of local and onsite zero and low carbon energy technologies are identified and incorporated into the design of the development. 3. Developments will be required to adopt a fabric first approach. All new major development should be built to achieve the following levels of sustainable construction unless it can be clearly demonstrated that	No likely significant effects. This is a design management policy requiring new development to incorporate sustainability measures with regards to energy demands and technologies. This policy does not control either the quantum or location of new development.

Policy Name	Policy Description	Screening Outcome
	targets cannot be met. Developments must, as a minimum, be designed and constructed to be carbon ready by design; - New residential dwellings to be built to a minimum 3-star standard or above of the Home Quality Mark. - New non-residential/commercial buildings to meet the BREEAM Very Good rating or higher.	There are no linking impact pathways present.
Policy CC5: Renewable and Low Carbon and Heat Projects	- Development proposals for renewable and low carbon energy generation and distribution networks, including heat network schemes and community led energy schemes will be supported where: - The physical and visual impacts do not result in an adverse impact on the local environment that cannot satisfactorily be mitigated. This includes impacts upon landscape character, National Landscapes and their setting, residential amenity, biodiversity including habitats and species, geodiversity, flood risk and the historic environment. Impact considerations should also consider noise, shadow flicker, vibration and visual impacts such as glint or glare; - The impacts and any required mitigation are acceptable in relation to highway safety, rail safety, aviation and defence navigation and communication systems; - Proposals utilise commercial and previously developed land/buildings (where available) and avoid the loss of significant areas of the best and most versatile agricultural land. Where applications relate to agricultural land that the site can continue to be used for agricultural activity (including the grazing of animals) that is proportionate to the scale of the proposal; and - That a mechanism is provided to restore the site to its original use or an acceptable alternative use once the proposed use ceases including the removal of technology. - When located in the Green Belt, some aspects of renewable energy projects may comprise inappropriate development. Inappropriate development is by definition harmful to the Green Belt. In such cases, developers will need to demonstrate very special circumstances. - Development proposals are required to maximise the use of the available resources by deploying installations with the greatest energy output whilst ensuring that the development is acceptable in planning terms. This includes maximising solar photovoltaic energy as well as considering the potential for thermal and energy storage and smart energy / demand management systems, except to the extent that developers demonstrate these requirements are not viable. - Where feasible, solar thermal energy will also be supported within new development. - Major development proposals should demonstrate compliance with this policy within their Energy and Climate Change Statement. Proposals should also demonstrate that effective engagement with stakeholders and communities has taken place to ensure that appropriate mitigation can be provided as required to make the development acceptable in planning terms.	No likely significant effects. This is a development management policy setting criteria for the development of renewable and low carbon energy generation and distribution networks. While renewable energy projects could lead to effects on Habitats sites depending on type, location and scale, this policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy CC6: Water Efficiency	- All new residential and commercial developments (including building refurbishment and retrofitting) will be required to demonstrate, through the energy and climate change statement or design and access statement (as relevant) that the development is designed to minimise its impact on and make efficient use of water resources. For each development, a water efficiency calculator (or equivalent to) should be completed to accompany the application to demonstrate that the water efficiency targets set out below are being met or surpassed where possible. - All new residential development must be designed and built to achieve a maximum water use of 110 litres per person per day or the highest water efficiency standard that applies at the time of the planning application. - All proposals for non-residential development should maximise water efficiencies under the mandatory water credits category in the BREEAM Water Consumption assessment methodology. - Development proposals should demonstrate that water reuse and recycling and rainwater harvesting measures have been incorporated wherever possible to reduce demand on mains water supply as part of an integrated approach to water management.	No likely significant effects. This is a design management policy, requiring new development to be designed to minimise impact on water resources and incorporate water reuse and recycling where possible. This policy does not control either the quantum or location of new development. There are no linking

Policy Name	Policy Description	Screening Outcome
		impact pathways present.
Policy Managing Development Within Flood Risk Areas	CC7: New development proposed in an area identified as being at current or future risk of any source of flooding (as shown on the Tonbridge and Malling Level Borough Council Strategic Flood Risk Assessment) will be expected to demonstrate it fully accords with the following criteria: - Where required, meets the sequential test and where required, the exceptions test (as set out in the NPPF) taking into account all sources of flood risk and the current and future impacts of climate change. Within the site, a sequential approach shall be applied with the most vulnerable development being located in areas of lowest flood risk. - Development proposals are accompanied by a site-specific Flood Risk Assessment (as set out within the NPPF) which takes account of all sources of flooding and the current and future impacts of climate change as well as any residual risk. The FRA shall demonstrate that the development can be made safe for its lifetime, without increasing flood risk elsewhere. - Any advice from the Environment Agency and other relevant flood risk management authority, such as lead local flood authorities and internal drainage boards has been taken into account and implemented. - Flood resilient measures and residual risk management measures shall be incorporated into the development in accordance with any recommendations of the Flood Risk Assessment or flood risk management authority, so it is appropriately flood resistant and resilient with the use of natural flood management techniques where suitable and feasible. - Measures are incorporated to ensure that development proposals do not have any adverse effects on the capacity or water quality of any watercourse or floodplain. 2. Applications for flood management and infrastructure projects will be supported where the proposal presents no conflict with other policies within this Plan.	No likely significant effects. This is a development management policy setting criteria for any development that is to take place within flood risk areas, including a requirement for a flood risk assessment. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy Sustainable Drainage Systems [SUDS]	CC8: 1. All development proposals which could affect drainage on or around the site will be required to manage surface water resulting from the development using sustainable drainage systems (SuDS) in accordance with the following details. - All sustainable drainage system shall be designed to operate without any flooding occurring during any rainfall event up to (and including) the critical 1 in 30 year storm (3.33% Annual Exceedance Probability (AEP)). - The system must also be able to accommodate the rainfall generated by events of varying durations and intensities up to (and including) the critical, climate change adjusted 1 in 100 year storm (1% AEP). The drainage system shall not increase flood risk off site and have the following design principles; - Designed in a manner which is sensitively located and safeguards visual and residential amenity. - Designed to provide multifunctional benefits for people, green infrastructure, water habitats and biodiversity. - Follows natural drainage flow paths and operates with existing site topography. - Is accompanied with a scheme for the long-term maintenance and funding of the SuDS for the lifetime of the development. Planning conditions and/or obligations shall be used to secure these arrangements. 2. Run-off shall be in accordance with the following hierarchy: - Infiltration - To a surface water body - To a surface water sewer - To a combined sewer 3. Surface water connections to the public sewerage network should only be made with prior agreement of the relevant sewerage undertaker and where it can be demonstrated that there are no feasible alternatives and the connection will not detriment existing users.	No likely significant effects. This is a design management policy, requiring development to incorporate SUDS where it would otherwise affect drainage. This policy also sets a hierarchy for managing surface run-off. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	4. For proposed development sites that meet with any of the following conditions the SuDS shall only discharge at a rate equivalent to or below Qbar for all designed rainfall events. A staged discharge will not be acceptable: a) Are situated in a high cumulative impact catchment area as defined within the Cumulative Impact Assessment of the Tonbridge and Malling Borough Council Level 1 Strategic Flood Risk Assessment. b) Where the surface water currently discharges to a sewer (either surface water, combined, highway or foul). c) Where the surface water currently discharges to a watercourse that is culverted either at the point of discharge or downstream of the discharge point. 5. Has taken account of and implemented advice from the Lead Local Flood Authority. 6. All other development will be expected to incorporate SuDs for a surface water design flood event where practically possible and feasible.	
Policy Provision of Infrastructure and Services	INF1: of and 1. Adequate infrastructure and services are important for creating and sustaining communities. New developments will be required to consider their impact upon the capacity of existing infrastructure and services. Early engagement with infrastructure providers is expected, to identify whether new or improved infrastructure and services including utilities will be required to support the growth proposed. 2. Planning permission will only be granted where it can be demonstrated that there is or will be, sufficient infrastructure and services to meet the requirements arising from the proposed development. 3. New healthcare, education facilities and other services (where required) should be provided in locations that relate well to both existing and new development. These facilities should be accessible by existing or new/improved public transport services and walking, wheeling and cycling routes. 4. Development that supports or provides carbon neutral utilities schemes that contribute to helping the council meet its carbon neutral target will be supported. 5. Applicants must work with commercial providers at an early stage to deliver broadband and mobile connectivity within their housing and employment developments, ensuring high speed connections and sufficient mobile telecommunications coverage are available. 6. New or improved infrastructure and services will be delivered either on-site by developers or off-site through S106 or S278 agreements. Planning obligations will be linked to development phasing or trigger points to ensure delivery occurs when required. 7. Long-term maintenance and management of infrastructure assets must also be considered where contributions towards maintenance and management secured. <u>Phased delivery of infrastructure and services</u> 8. The delivery of new or improved infrastructure and services will need to be agreed in terms of its delivery phasing and timing. This should be informed by liaison with infrastructure and service providers to ensure that requirements that infrastructure becomes available when required to support the needs arising from the development in parallel. Some infrastructure requirements or contributions may need to be delivered prior to the commencement of development or first occupation. 9. Developments that are brought forward in phases or by multiple developers must ensure that infrastructure and services including utilities are delivered to the boundary of each phase or parcel, to ensure that future parcels or services can be achieved without retrofitting. The delivery of infrastructure and services will be in accordance with any masterplan and / or phasing plan for the overall development and will be secured by S106 agreements. Proposals that would compromise existing utilities infrastructure or encroach on future connections will be refused. 10. All infrastructure and services must be built to the required regulatory standards as agreed with infrastructure providers with appropriate arrangements for in perpetuity management and	No likely significant effects. This is a development management policy, requiring new development to ensure there is sufficient infrastructure provision. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	maintenance so that adoption by the regulatory body, subject to the agreement of the local planning authority and regulatory body. Viability 11. Viability reasons for non-delivery will only be considered in exceptional circumstances. To demonstrate this, applicants must provide a satisfactory viability assessment (open book) prior to the validation of the planning application. All costs associated with the development should be clearly set out including any abnormal or unforeseen costs. The assessment will be required to demonstrate how the value of planning obligations has been maximised. The council will use an independent consultant to verify the assessment, the cost of this will be funded by the applicant. All viability assessments will be published as part of the application documents. 12. If the full requirement of infrastructure and services mitigation requirements is not able to be delivered due to viability, including affordable housing requirements, then developments will only be permitted where their benefits outweigh the harm as a result of the lack of full mitigation and other relevant requirements, having regard to all material considerations. 13. Where viability is an issue in the delivery of infrastructure and services, a clawback mechanism will be included in the legal agreement(s) to ensure that the full infrastructure and service requirements can be provided, should viability, as informed by relevant viability assessments, improve following the grant of planning permission.	
Policy Sustainable Transport and Active Travel	INF2: 1. The council recognises the importance of delivering and enhancing sustainable and active travel infrastructure which is essential to support the vitality of new and existing communities. Adopting a 'decide and provide' approach, the council will work in partnership with Kent County Council, Highways England and transport providers to ensure that developments mitigate their travel demand and traffic impacts. 2. Proposals as relevant will be required to design schemes that will contribute to healthy places and streets and enable an integrated and improved transport network for all users, reducing car journeys and providing greater sustainable travel choices. Public transport and active travel 3. It is acknowledged that mitigation options will vary from site to site. Site promoters should however prioritise: a) Supporting and enhancing existing bus services especially those connecting rural service centres and larger villages, to make these more attractive and commercially sustainable through enhanced service frequency, hours of operation and through the provision of high-quality vehicles and kerb-side facilities (as required). There will also be support for measures that are identified in the Kent Bus Services Improvement Plan (BSIP)⁵⁷; b) Supporting rail services through the provision of access and station facilities improvements, that make it more desirable, convenient and safer for passengers to undertake linked non-car journeys; c) Including measures for on-site public rights of way improvements for walking, wheeling and cycling as appropriate; and d) Having regard to the Kent Public Rights of Way Improvement Plan⁵⁸ and borough Active Travel Strategy, in protecting and enhancing off-site public rights of way to achieve a high-quality network of routes for walking, wheeling, cycling and equestrian use which where possible are compliant with (Local Transport Note 1/20 or any subsequent guidance); g) Providing a contribution towards the borough council's car club scheme (subject to operational coverage), in-particular where on-site parking provision is restricted. 4. Active travel infrastructure should be accessible and inclusive. Cycleways should provide enough space for adapted cycles such as tricycles, tandems, wheelchair cycles.	No likely significant effects. This is a positive development management policy, requiring new development to support public transportation and active travel. This policy also sets requirements for highway design to be appropriate and provide safe access and turning for emergency vehicles. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	Traffic and highways 5. In terms of traffic and highway design, developments will be supported where: a) The nature and level of traffic can be accommodated without adversely impacting upon the safety, amenity or character of the surrounding area; b) Roads and junctions within the development, including those to be altered or added as a result of the development, are designed and delivered in accordance with appropriate highway design standards; c) Suitable and safe vehicle access and turning and access provision for service vehicles e.g. refuse and emergency service vehicles can be made in a forward direction; d) The development provides a design and layout that will encourage slower driving speeds prioritising non-motorised travel (walking, wheeling and cycling) where segregated provision for these modes can't be achieved. 6. A Transport Assessment or Transport Statement and Sustainable Travel Plan, as relevant to the scale and nature of the development should be submitted with all applications (in line with Kent County Council guidance). Where assessments are required, they must cover the full extent of transport implications arising from the development. 7. Any transport improvements required will be secured by legal agreement.	
Policy INF3: Parking	1. All new developments will be required to consider and provide adequate and well-integrated parking for all types of vehicles, taking account of KCC's Parking Standards (2025) for these or any subsequent replacement guidance. This guidance is the starting point for engagement with the Local Planning and Highway Authority on parking and layout matters relating to new developments and early engagement on the quantity and design of parking is encouraged. 2. In considering new parking provision for all types of vehicles, the applicant shall consider local circumstances including: a) Reasonable demand that will derive from the development including visitor use / parking requirements; b) The proximity, accessibility and availability of public transport; c) How to encourage travel by sustainable modes of transport; d) Levels of car ownership; e) Existing parking controls; f) Local travel patterns; g) The safe operation of the public highway; and h) access to and from the residential development; 3. For residential developments, the consideration of the amount, location, layout and design of parking will be required to be considered at an early stage and as an integral part in the design of the development. It will be important to ensure that parking provision is appropriate to the development including: a) How the parking spaces / infrastructure will be used in practice, b) Ensuring that parking provision does not detract from the public realm; and c) Ensuring that parking is as secure as possible to encourage use. 4. For non-residential uses, parking should be considered on a 'first principles' approach taking into account predicted parking requirements and local circumstances. Applicants will be required to demonstrate that demand for parking (including staff) is either met on-site or mitigated and managed as appropriate. 5. New developments should also provide an appropriate level of disabled parking, parking for mobility aids, parking for adaptive bicycles and provision of electric vehicle and bike charging, with appropriate signage, which takes into consideration Kent County Council guidance. Parking and storage for bicycles, e-bicycles and motorcycles should also be provided in accordance with the guidance. 6. Transport Assessments and Travel Plans will be required to support and justify proposed parking arrangements including their effective operation. Where the proposed supply of parking deviates significantly from the Kent County Council recommended standard, a	No likely significant effects. This is a design management policy requiring development to consider the needed parking provision, factoring in sustainable transport considerations and requirements for disabled parking provision amongst other factors. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.

Policy Name	Policy Description	Screening Outcome
	detailed justification will be required to be submitted with the planning application.	
Policy INF4: Community Facilities	1. The council will encourage the retention, extension and provision of new community facilities, particularly in areas where there are poor levels of provision and where community facilities are required to meet identified needs arising from new development. Improvements to existing facilities should ensure that quality standards and service provision remain or are enhanced to ensure that all residents have access to facilities to meet their needs. 2. New or enhanced community facilities will be delivered via on-site measures and / or through off-site financial contributions, secured through planning obligations. <u>New and additional facilities</u> 3. Proposals for new or improved community facilities will be supported, where the below criteria are met: a) Provision is within, adjoining or physically near to a built-up settlement boundary, unless it can be demonstrated that the proposed location is the only suitable option, is well-related to the community it will serve and will ensure that the character of the area is not harmed; b) Accessible to the majority of the community it serves by walking or wheeling; c) Designed, where possible, for flexible use and facility sharing to encourage a range of uses and activities and to ensure adaptability if demand for the facility changes; d) Designed to ensure all potential users can access the facility and include accessible public toilet facilities for childcare and for those with a disability; and e) Be designed in a way that will reduce the potential for crime and anti-social behaviour. <u>Loss of existing facilities</u> 4. Development proposals that will result in the loss or partial loss of a community facility will not be permitted unless it is demonstrated that: a) The activities provided by the facility are adequately served by an existing or new accessible facility within the community at an alternative location. Where a new facility is proposed this should be of equal or higher value than the lost facility; b) The facility is no longer required by the community or is no longer feasible, financially viable or operational reasons for closing or moving the facility can be demonstrated; c) The facility has been vacant for 18 months and it can be demonstrated via an active market campaign that there is no current or alternative use demand for the facility; d) The partial loss will contribute to the continuation of the existing community use (should the existing use require less floorspace) and it can be demonstrated that the existing use would otherwise be unviable but can be retained by cross-subsidy; e) Proposals that would result in the loss of features associated with a community facility, that are likely to undermine a sites viability, such as but not limited to car parking or function rooms, will be refused planning permission unless the impact can be sufficiently mitigated and there are clearly justified circumstances for such a proposal to proceed. 5. If the council require the review of any submitted marketing and viability information by an independent consultant, it is expected that the applicant will cover the cost of this.	No likely significant effects. This policy supports the retention of existing community facilities and supports the development of new facilities where this meets certain requirements. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision	1. The council will protect existing and support the provision of new and enhanced high quality open space, sports, and recreation provision to ensure that residents and visitors can enjoy the benefits that such facilities bring including contributing to health and wellbeing. The provision of new or enhanced open space provision 2. Residential developments of 6 or more dwellings (use classes C3 and C4) will be required to provide or contribute towards the provision or improvement of open space, sports and recreation facilities in accordance with Annex 4. 3. High quality on-site provision should be sought as per Annex 4 unless exceptional circumstances exist where off-site provision would better provide for the community, there is already excess provision or where site constraints cannot be overcome to deliver on-site provision.	No likely significant effects. This is a development management policy supporting the provision of sports facilities and open space. The requirement for residential development to provide or contribute to the provision of open space or recreation

Policy Name	Policy Description	Screening Outcome
	4. The type(s) of open space, sports and recreation provision to be provided will be discussed with the applicant at the pre-application stage taking into account the most up-to-date published Open Space Study, Annex 4 and other information as relevant, that provides a qualitative and quantitative assessment of open space requirements. An early consideration of open space requirements and designing high quality provision into the scheme from the outset will be required. 5. Where provision is negotiated off-site, contributions will be sought to provide or improve open space within the ward or nearby ward to which the development is located, to ensure provision is locally specific, with contributions secured through a S106 legal agreement. Sports provision (including indoor facilities, playing pitches and ancillary facilities) 6. Proposals for sports provision will be supported where they meet the needs of the local community and/or unmet need within the borough. The requirement for new or enhanced sports provision will be informed by the Playing Pitch and Outdoor Sports Facility Strategy (2025) and the Indoor Sports facilities Study (2025) (or any subsequent updates to these) and any further information in relation to the distance and capacity of existing facilities. The Sport England Sports Facility Calculator and Playing Pitch Calculator⁵⁹ will also be used by the council to help determine whether a development will be required to provide new provision or contribute to existing provision. 7. Residential development of 6 or more dwellings (use classes C3 and C4) will be required to contribute to the provision or enhancement of sports provision (in addition to open space and recreation provision) to meet the needs and demand of its future occupants. Where shortfalls are identified but do not require the provision of new facilities or provision on site, the council will seek developer contributions for the enhancement and maintenance of existing sports provision secured through a S106 legal agreement. 8. The scale of development and the site-specific context will inform whether provision should be made on site or through contributions towards existing sites. New provision will need to include appropriate ancillary facilities and parking. 9. Sports provision will be supported where it will facilitate community access including sports provision within schools, secured with a community use agreement. 10. In accordance with other policies in this plan, the provision and design of new open space, sports and recreation provision will be expected to provide safe and accessible facilities, be sustainably located, include opportunities for habitat creation and sustainable urban drainage, and consider use of lighting including LED heads and switching gear. 11. Publicly accessible open space, sport and recreation facilities once provided, need to be maintained to a good standard. As such a clear management plan and operational arrangements that will sustain the provision in perpetuity, need to be identified and agreed with the council. Contributions towards maintenance will be secured by S106 legal agreement.	facilities provides a positive benefit towards ensuring adequate recreational opportunities that do not negatively impact Habitats sites. This policy does not control either the quantum or location of new development. There are no linking impact pathways present.
Policy Supporting Prosperous, Inclusive and Sustainable Economic Future	E1: 1. Economic development proposals will be supported where they contribute towards the delivery of a prosperous, inclusive and sustainable economic future in the borough. This will be achieved through the following: a) Protecting and retaining existing employment floorspace and supporting proposals for new employment floorspace that is well-designed, of good quality and is flexible in terms of operation and use. b) c) Supporting proposals for different employment premises at a range of scales that meet business needs within the industrial, logistics and offices sectors, that clearly evidence relevant market demand; Supporting proposals that seek to improve or upgrade the quality of employment premises / floorspace including through redevelopment, conversion, refurbishment, intensification or reconfiguration, which will lead to an improvement of employment provision, an increase in job growth and / or will assist to meet the needs of modern-day businesses and market demands;	No likely significant effects. This policy supports economic developments. This is done in several ways including ensuring that existing employment floorspace is preserved, supporting improvement to existing employment premises and supporting the decarbonisation of businesses.

Policy Name	Policy Description	Screening Outcome											
	d) Locating employment floorspace near to labour supply and in appropriate locations as relevant to the nature of the business including transport requirements and proximity to strategic routes; e) Support proposals that will deliver the necessary infrastructure in a timely manner or where there is currently or will be sufficient capacity to support the proposal; f) Supporting business startups and small and medium sized enterprises (SME's) by creating conditions in which businesses can innovate and grow; g) Ensuring that proposals deliver environmental and climate change policy requirements to assist in decarbonising the economy including adaptation of existing businesses. This includes delivering sustainably constructed business premises and delivering energy efficient buildings, sustainable business operations and processes, sustainable travel infrastructure opportunities and improvements, innovation and technology development, digital infrastructure improvements to facilitate home working as appropriate, EV charging points and cycle storage; and h) Supporting proposals that will contribute to addressing local skill shortages, support local employment, re-skilling and retraining and those that enable green economy outcomes.	This policy does not control either the quantum or location of new development. Therefore, there are no linking impact pathways present. It is noted that any development brought forward under this assessment would need to be assessed for likely significant effects.											
Policy E2: Strategic Employment Areas	1. The following strategic employment sites, premises and floorspace will be retained and safeguarded for employment purposes. a) <table><tr><th>Employment Area</th><th>Acceptable Uses</th></tr><tr><td>Tonbridge Industrial Area including premises at Cannon Lane, Vale Road, Vale Rise, Morley Road, Sovereign Way and Tannery Road (47.2 ha)</td><td rowspan="8">General Industry - B2 Storage and Distribution - B8 Ancillary Office - E(g)</td></tr><tr><td>New Hythe Industrial Area including Panattoni Park Aylesford (126ha)</td></tr><tr><td>Quarry Wood Industrial Area including Britania Business Park and Priory Park, Aylesford (37.6ha)</td></tr><tr><td>North Snodland Industrial Area including Vantage Point and Arc Logistics Park (8.5ha)</td></tr><tr><td>East Snodland Industrial Area including Mid Kent Business Park and Smurfit Kappa (26 ha)</td></tr><tr><td>South Snodland Industrial Area, including premises at Hays Road (17.5ha)</td></tr><tr><td>Forstal Road Industrial Area, Aylesford (part within Tonbridge and Malling), including premises at the Deacon Trading Estate, Cottage Industrial Estate and Beddow Way (19.1ha)</td></tr><tr><td>Industrial Area North of M20 Jn6, including premises at Coldharbour Lane and Frank Sando Way (11.7ha)</td></tr></table>	Employment Area	Acceptable Uses	Tonbridge Industrial Area including premises at Cannon Lane, Vale Road, Vale Rise, Morley Road, Sovereign Way and Tannery Road (47.2 ha)	General Industry - B2 Storage and Distribution - B8 Ancillary Office - E(g)	New Hythe Industrial Area including Panattoni Park Aylesford (126ha)	Quarry Wood Industrial Area including Britania Business Park and Priory Park, Aylesford (37.6ha)	North Snodland Industrial Area including Vantage Point and Arc Logistics Park (8.5ha)	East Snodland Industrial Area including Mid Kent Business Park and Smurfit Kappa (26 ha)	South Snodland Industrial Area, including premises at Hays Road (17.5ha)	Forstal Road Industrial Area, Aylesford (part within Tonbridge and Malling), including premises at the Deacon Trading Estate, Cottage Industrial Estate and Beddow Way (19.1ha)	Industrial Area North of M20 Jn6, including premises at Coldharbour Lane and Frank Sando Way (11.7ha)	No likely significant effects. This policy supports economic developments. This is done in by designating several employment areas, where employment development will broadly be supported and non-employment development will generally be resisted except where it ancillary to employment use or where employment uses are not viable and there is adequate employment space provision. This policy does not control the quantum of new development or identify how much will come forward at each safeguarded location. Therefore, there are no linking impact pathways present. It is noted that any development brought forward under this assessment would need to be assessed for likely significant effects.
Employment Area	Acceptable Uses												
Tonbridge Industrial Area including premises at Cannon Lane, Vale Road, Vale Rise, Morley Road, Sovereign Way and Tannery Road (47.2 ha)	General Industry - B2 Storage and Distribution - B8 Ancillary Office - E(g)												
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Policy Name	Policy Description	Screening Outcome															
	<table><tr><td>Innovation Park Medway, Rochester (part within Tonbridge and Malling), including premises at Laker Road (8.6ha)</td><td rowspan="4">General Industry - B2 Ancillary Office - E(g)</td></tr><tr><td>Wrotham Heath Industrial Area including Invicta Business Park and Panattoni Park Sevenoaks (4.3ha)</td></tr><tr><td>East Peckham Industrial Area including premises at Branbridges Industrial Estate, Archers Park, Adams Wharf and Arnold Business Park (10.4ha)</td></tr><tr><td>Borough Green Industrial Area, including premises at Cricketts Farm Business Park and H+H Celcon (13ha)</td></tr><tr><td></td><td>Platt Industrial Estate, St Mary's Platt (6.6ha)</td><td>General Industry - B2 Ancillary Office - E(g)</td></tr><tr><td></td><td>Tonbridge Town Centre (24.7ha)</td><td rowspan="3">Office, Research and Development - E1(g) i) and ii)</td></tr><tr><td></td><td>Kings Hill Business Park including premises at Kings Hill Avenue, Gibson Drive, Alexander Grove and Jubilee Way (51 ha)</td></tr><tr><td></td><td>Hermitage Court, Hermitage Lane, Maidstone (5.5 ha)</td></tr></table>	Innovation Park Medway, Rochester (part within Tonbridge and Malling), including premises at Laker Road (8.6ha)	General Industry - B2 Ancillary Office - E(g)	Wrotham Heath Industrial Area including Invicta Business Park and Panattoni Park Sevenoaks (4.3ha)	East Peckham Industrial Area including premises at Branbridges Industrial Estate, Archers Park, Adams Wharf and Arnold Business Park (10.4ha)	Borough Green Industrial Area, including premises at Cricketts Farm Business Park and H+H Celcon (13ha)		Platt Industrial Estate, St Mary's Platt (6.6ha)	General Industry - B2 Ancillary Office - E(g)		Tonbridge Town Centre (24.7ha)	Office, Research and Development - E1(g) i) and ii)		Kings Hill Business Park including premises at Kings Hill Avenue, Gibson Drive, Alexander Grove and Jubilee Way (51 ha)		Hermitage Court, Hermitage Lane, Maidstone (5.5 ha)	
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	Kings Hill Business Park including premises at Kings Hill Avenue, Gibson Drive, Alexander Grove and Jubilee Way (51 ha)																
	Hermitage Court, Hermitage Lane, Maidstone (5.5 ha)																
	2. New employment space or the expansion or adaptation of employment space in these locations will generally be supported where uses are for E(g), B2 and B8, as identified in the table and where the proposal: a) Will lead to an improvement in the quantity and quality of employment floorspace and related jobs; b) Will not result in unacceptable impacts on the road network, providing sufficient parking for the use proposed; c) Will not affect the amenity of neighbouring properties; d) Complements the employment area and maximises the employment potential of the area. 3. Development for non-B2, B8 and E(g) uses in these locations including sui generis uses will only be permitted where there is a clear and evidenced justification for a departure from this policy and where the following criteria can be demonstrated: a) There will be no adverse impact on the employment land supply (amount, type, quality and use) and jobs; b) It can be demonstrated that there is a need for the type of employment use proposed to be located within the strategic employment site and that the use cannot be suitably provided elsewhere; c) That the current employment use is no longer viable for its current or last lawful use; d) That the proposed use will not inhibit the ability to provide equivalent employment on the site in the future; and e) That the alternative employment use supports the integrity and function of the employment site and is suitable when considering its relationship to other employment uses. 4. Ancillary services such as trade counters will be supported but only where they are a subsidiary and de-minimis feature of the																

Policy Name	Policy Description	Screening Outcome
	employment unit, support the primary business function of the unit and where they do not adversely affect the business function of the employment area or surrounding area, including by giving rise to unacceptable parking or highways impacts that cannot be appropriately mitigated. 5. Where the proposal relates to a non-employment use, due to there being no longer a demand for the site or premises or feature(s) associated with the employment use, then this should be demonstrated through: a. a minimum prior 12-month marketing exercise, where the site or premises have been genuinely offered for sale or letting on the open market at a realistic price and no reasonable offers have been refused. b. ii). Written evidence from a suitable commercial agent(s) will be required to support this. 4.	
Policy E3: Other Employment Premises and Floorspace	2. 1. Existing B2, B8 and E(g) employment sites premises and floorspace which are not situated within sites identified in policy E2 will be protected against loss to non-employment uses. Proposals that will result in the loss of employment use will only be permitted where: a) The current employment use is no longer viable for its current or last lawful use; b) The proposed use will not have an unacceptable adverse impact on the function or operation of the employment site, neighbouring businesses/uses or unduly affect neighbouring residential amenity due to transport movements, car parking, noise, or hours of operation; c) The proposal would result in economic benefits including job provision; and d) The current use of the site is not appropriate to be continued, and development of the site would result in an improvement to the built environment or the amenity of the area. Proposals for intensification, redevelopment or upgrading of existing facilities will be supported where they respond to modern day business needs, support job retention and creation, as well as maintain or exceed the extent of employment floorspace. Where the partial loss of employment use is proposed then applications will only be supported where the partial loss will contribute to the continuation of the existing employment use (should the existing use require less floorspace) and it can be demonstrated that the existing use would otherwise be unviable but can be retained by cross-subsidy. Proposals that would result in the loss of features associated with an employment use, that are likely to undermine a site's viability, such as but not limited to car parking, will be refused planning permission unless the impact can be sufficiently mitigated and there are clearly justified circumstances for such a proposal to proceed. Where the proposal relates to a non-employment use, due to there being no longer a demand for the site or premises or feature(s) associated with the employment use, then this should be demonstrated through: a) a minimum prior 12-month marketing exercise, where the site or premises have been genuinely offered for sale or letting on the open market at a realistic price and no reasonable offers have been refused. b) Written evidence from a suitable commercial agent(s) will be required to support this.	No likely significant effects. This is a development management policy resisting the loss of existing employment sites unless they meet certain requirements. This policy does not control either the quantum or location of new development. Therefore, there are no linking impact pathways present.
Policy E4: Employment Skills	1. Proposals for 1,000 sqm of commercial or community use floorspace or for residential developments of 20 units or more will be required to submit an Employment and Skills Training Plan to demonstrate how the proposal will contribute to employing, educating and training local people. The Employment and Skills Training Plan will need to consider both the construction and operation phase of the development. 2. The Employment and Skills Training Plan will need to at a minimum: a) Set out training to be provided to local people; b) Set out how jobs will be promoted to the community;	No likely significant effects. This policy ensures that developments over a certain scale provide an employment and skills training plan. This policy does not control either the

Policy Name	Policy Description	Screening Outcome
	c) Set out how local people will be prioritised for new opportunities, including those relating to sub-contractors; d) Set out how local education will be invested in; and e) Set out how the above will be monitored.	quantum or location of new development. Therefore, there are no linking impact pathways present.
Policy E5: Supporting the Vitality of Town, Service and Local Centres	1. The hierarchy of centres will be expected to be the focus for main town centre uses and the role and function of the centres will be protected and enhanced. 2. Within the defined centres proposals will be supported where they are located within the Town centre boundary and contribute to the regeneration of the town centre including for retail, food and drink, financial and professional services, leisure, entertainment, indoor sport and recreation, offices, arts, culture and tourism, residential and employment development as well as markets.. 3. Proposals for town centre uses will be supported where: a. They are located within the defined town centre boundaries; b. They provide an active frontage, ensuring that there is no break in active frontages; c. The proposal maintains and enhances the centres vitality and viability by contributing to the overall balance, mix and diverse offer of town centre uses to support the local communities; d. The proposal is of an appropriate scale commensurate to the size and function of the centre and does not result in amenity issues, such as noise and odour; e. The proposal positively contributes to wellbeing and placemaking including the identity of the centre as opportunities allow. Providing an improved service and experience, improved accessibility and sustainable travel facilities, enhanced public realm, urban greening including linking to blue and green infrastructure, as well as enhancing heritage assets and their setting. 4. Within defined local centres proposals will be supported where they provide a direct service to the general public and the use would not result in the loss of local accessible (by walking or wheeling) shopping facilities. For town centre regeneration proposals, these should be supported by relevant impact assessments to ensure that the development will be inclusive. 5. Meanwhile uses will be supported in town centres where they enhance the character and vitality of the area, maintain active ground floor frontages and retain any existing shopfronts. Meanwhile uses should be precursors to permanent uses or development, that secure the reoccupation of a vacant site or premises, and which contribute economic, social and/or environmental benefits to the centre. Proposals relating to the night-time economy in Tonbridge town centre and district centres will be supported where they do not affect day-time footfall, have an active frontage and will not result in any negative environmental or amenity effects with appropriate mitigation in place. 6. Within the defined centres a change of use at ground floor level to a non-town centre use will not be permitted, unless the site is allocated to deliver residential development. This includes the change of use of existing ground floor premises to residential.	No likely significant effects. This is a development management policy supporting town centre uses within the defined town centre boundaries. This policy supports development where it is consistent and supports the character of town and local centres. This policy does not control the quantum of new development. Therefore, there are no linking impact pathways present. It is noted that any development brought forward under this assessment would need to be assessed for likely significant effects.
Policy E6: Primary Shopping Areas	1. To ensure that Tonbridge continues to meet the shopping needs of the community, proposals for development within the primary shopping area, as defined on the Policies Map, will be supported and encouraged where: a) They improve the quality and mix of uses within Class E to enhance the role of the town centre and their vitality, viability and street-level vibrancy; b) They provide a complimentary town centre function (for non E class uses); c) They seek to retain and enhance the active frontage at ground floor level contributing to the character and function of the town centre and public realm; and d) They provide a high-quality shop front design and ensure accessibility for all users. 2. Uses within the Primary Shopping Area that are considered to detract from the overall shopping function, including those with closed or inactive frontages will not be supported.	No likely significant effects. This policy designates a primary shopping area in Tonbridge. This policy does not control the quantum of new development. Therefore, there are no linking impact pathways present. It is noted that any development brought forward under this assessment would need to be assessed for likely significant effects.

Policy Name	Policy Description	Screening Outcome
Policy E7: Above Ground Floorspace	1. Proposals for upper floor uses within the defined town centre boundaries that contribute to the centre's vitality, viability and sustainability, including residential uses, commercial uses, co-working spaces, cultural uses or community facilities will be supported where: a) The redevelopment of upper floors does not result in the loss of ancillary storage space or other beneficial uses to the extent that it would make a ground floor unit unviable; b) The redevelopment would not result in the loss of residential or employment floorspace, unless the use is located in the primary shopping area and is for a Class E use; c) The proposal makes efficient use of space and contributes to the overall mix of uses; d) The proposal provides a separate and adequate access to the upper floor(s) ensuring that any new entrance or use does not affect the character and appearance of the building, the public realm, or the functionality or character of the town centre; e) The use does not affect or adversely exacerbate the properties existing servicing arrangements, parking or result in adverse traffic impacts; f) The upper floors have sufficient refuse storage and collection space and cycle storage space, where this is possible. Where upper floors are located within conservation areas or involve heritage assets, proposals must preserve or enhance the significance of those assets and comply with relevant heritage policies.	No likely significant effects. This is a development management policy supporting the use of higher floors within town centres for other uses. This policy does not control the quantum or location of new development. Therefore, there are no linking impact pathways present.
Policy E8: Sequential and Local Impact Tests	1. In accordance with the NPPF, main town centre uses should be located in the defined town centres. Where main town centre uses are proposed elsewhere then the sequential approach will be applied where applicants must be able to demonstrate, with a robust justification, that sites firstly within town centres and then secondly on the edge of town centres are not available. 2. Where the sequential approach is met, then main town centre uses will need to be located in accessible and sustainable locations which are well connected to the nearest town centre. 3. Opportunities to utilise town centre or edge of centre sites should be fully explored, including a satisfactory area of search, before considering sites elsewhere. This will need to be demonstrated including considering flexibility on issues such as format and scale. 4. Outside designated town centre boundaries, applications for retail and leisure uses, or retail and leisure uses combined, will be required to submit an impact assessment where the development is for 400sqm or more of retail or leisure floorspace. This includes combined floorspace across different phases of development and mixed-use developments. For other town centre uses an impact assessment will be required for developments of 2,500sqm or more. 5. The impact assessment should be proportionate to the size of the development being proposed and must sufficiently demonstrate that the proposal will not have an adverse effect on any town centre within the borough or in surrounding areas, either on its own or cumulatively. 6. Where out of town locations are considered suitable, planning conditions and / or legal agreements may be required to ensure that any subsequent future use does not result in an adverse impact on town centres.	No likely significant effects. This is a development management policy requiring a sequential impact test to be undertaken for the development of town centre uses outside of the defined town and local centres. This policy does not control the quantum of new development. Therefore, there are no linking impact pathways present.

Table 5. Allocations Screening Table for the Tonbridge and Malling Local Plan

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
58499 59674	Land South of High Street Aylesford	33 Dwellings	2.8km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Water Quality Water Quantity Level and Flow
58538	Winterfield Farm, East Malling	25 Dwellings	4.6km NW North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
58550	Land adjacent Larkfield Library	30 Dwellings	4.2km NE Peters Pit SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
58576	Paris Farm, Rocks Road, East Malling	105 Dwellings	5.7km N Peters Pit SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
58613	Rear of Platt Mill Close, Platt	10 Dwellings	7.5km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
58665	Holmes Paddock, Ryarsh	20 Dwellings	2.5km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
58751 59789 68376	Land South of Church Lane Hale Street	396 Dwellings	13.6km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
58846	The River Centre, Tonbridge	118 Dwellings	16.2km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Water Quantity Level and Flow
59603	Land West of King Hill and Northwest of Ashton Way / Malling Road roundabout, West Malling	30 Dwellings	5.8km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59613	Land West of Addlestead Road, East Peckham, Tonbridge	50 Dwellings	14.5km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59653 59615 59692 68432	Land off Stocks Green Road, Hildenborough	629 Dwellings	16.4km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59617	Land South of Potash Lane and North of Paddock Orchard, Platt	5 Dwellings	7.5km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59647 68365	Land North of Court Lane Hadlow	65 Dwellings	12.9km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59654	Land East of Red Hill, Watlington, Maidstone	30 Dwellings	8.8km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59676 59675 59763 59678	Land At Aylesford Lakes, Aylesford	800 Dwellings	1.9km E North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
59721 59693 59865 68388 59690	Land North East of Tonbridge	1,671 Dwellings	15.8km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59702	Land Opposite Hale House, Pilgrims Way, Aylesford	40 Dwellings	2.1km E North Downs Woodland SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59740 59634	Land at Broadwater Farm, Kings Hill, West Malling	900 Dwellings	5.2km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59745	Hilden Farm Road, Tonbridge	30 Dwellings	16.9km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59746 59625	Coblans Nursery and Little Trench Farm, Trench Road, Tonbridge	294 Dwellings	16.1km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59770	Land South of Bramleys, Rectory Lane, Ightham, Sevenoaks	10 Dwellings	10.0km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59776	Land North of The Paddock and East of Carpenters Lane, Tonbridge	120 Dwellings	12.6km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59781	Land Off Hall Road, Royal British Legion Industries, Aylesford	75 Dwellings	3.2km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present:

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59782	Land west of Hale Street, East Peckham, Tonbridge	140 Dwellings	13.3km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59830 59732	Land North of Borough Green, Sevenoaks	3000 Dwellings	6.0km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59842	Land South of Common Road, Hadlow	101 Dwellings	16.4km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59843	Land South and West of Tillmans Off, Crouch Lane, Sevenoaks	50 Dwellings	8.1km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59844 59756	Land Between Ashton Way and London Road, Leybourne, West Malling	70 Dwellings	4.2km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59852	Land At Bunyards, Beaver Road, Allington, Maidstone	435 Dwellings	3.5km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59861	Land east of Kiln Barn Road and west of Hermitage Lane, Aylesford	1300 Dwellings	3.9km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present:

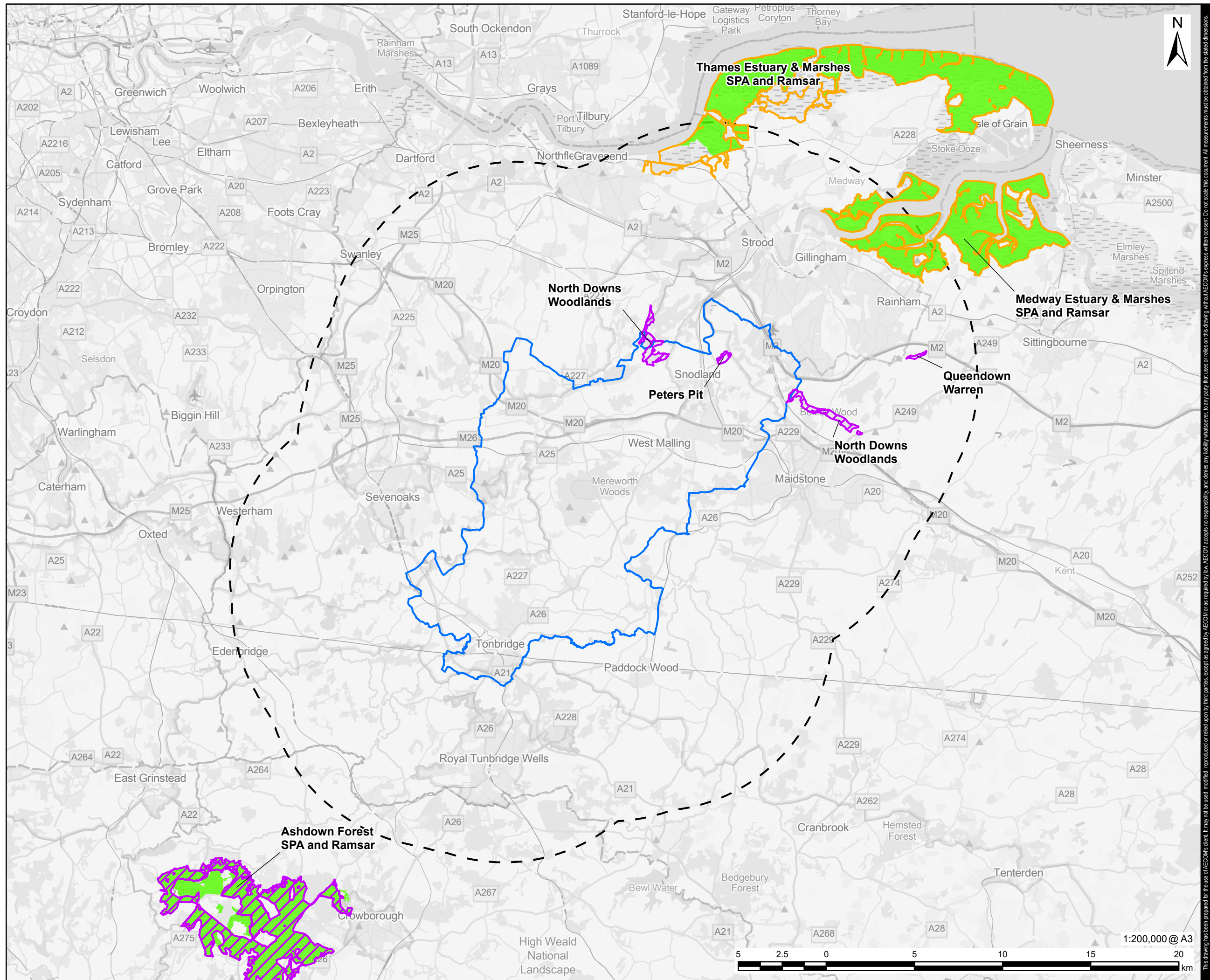
Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59871	Land Known as Churchfields Farm and Coney Field, Fen Pond Road, Ightham	8 Dwellings	9.5km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
59878	Land North of Priory Road, South of The Railway, Tonbridge	136 Dwellings	15.7km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59896	East of Riding Lane, Hildenborough	77 Dwellings	16.7km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59953	Existing premises at 56 to 62 Martin's Square, Larkfield	16 Dwellings	4.0km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68351	Existing premises at Heart of Kent Hospice, Preston Hall, Aylesford	10 Dwellings	3.2km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68372	Land South of London Road and Rear of Howlands Court, Wrotham, Sevenoaks	25 Dwellings	6.9km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68401 59893	Land North West of Hilden Park, Tonbridge	289 Dwellings	16.9km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Water Quality Water Quantity Level and Flow
68406	Land east of 4 Pratling Street and south of Pratling Street, Aylesford	40 Dwellings	1.9km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68419	Land Adjacent to Vauxhall Gardens and The Vauxhall Inn, Vauxhall Lane, Tonbridge	75 Dwellings	15.2km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68423	Land north of Holborough Lakes, Snodland	1300 Dwellings	0.6km W North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68428	North of Pratling Street, Aylesford	90 Dwellings	1.7km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68436	Land At Wouldham Allotments and Rear of Oldfield Drive, Wouldham, Rochester	40 Dwellings	0.9km SE Peters Pit SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68437	Existing premises at 1 Tower View, Kings Hill, West Malling	60 Dwellings	6.2km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68443	Existing premises at 32 Tower View, Kings Hill, West Malling	60 Dwellings	6.7km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Water Quality Water Quantity Level and Flow
68447	Existing premises at 34 Tower View, Kings Hill, West Malling	45 Dwellings	6.7km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68448	Existing premises at 42 Kings Hill Avenue, Kings Hill	55 Dwellings	6.4km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68449	Court Lane Nurseries, Court Lane, Hadlow, Tonbridge	85 Dwellings	13.2km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68450	Existing premises at 11 Tower View, Kings Hill, West Malling	70 Dwellings	6.5km N North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Recreational Pressure Atmospheric pollution Water Quality Water Quantity Level and Flow
68456 59893	Land at south west Tonbridge	423 Dwellings	14.5km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68471	Sovereign Way North	122 Dwellings	16.1km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68472	Angel Centre, Tonbridge	56 Dwellings	15.9km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
58631	Celcon Works, Borough Green	4,000 m ²	8.3km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59738	Land South of Hermitage Court, Hermitage Lane, Maidstone	1000 m ²	4.8km NE North Downs Woodland SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59822	Land East of Platt Industrial Estate, Platt	8000 m ²	6.9km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59856	East Malling Research Station, New Road, East Malling	45080 m ²	4.9km NE North Downs Woodland SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59863	Land at Spider Hall, Bull Road, Leybourne, West Malling	1000 m ²	2.9km NW North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
59874	Land West of Hays Road, Snodland	3000 m ²	2.4km NW North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68358	Land at Sanderson Way and Little Postern, Tonbridge	44700/ 2500 m ²	16.7km SW Ashdown Forest SAC/SPA	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow
68412	Land west of Rochester Airport, Rochester	14000 m ²	2.5km SW Peters Pit SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality

Site Ref	Site Name	Residential and Employment Yield	Distance and Direction to Nearest Habitats site	Screening Outcome
				Water Quantity Level and Flow
68444	Land East of Coldharbour Lane (Junction 5 Of M20) And South of M20, Aylesford	12000 m ²	2.8km NE North Downs Woodlands SAC	Likely significant effects present The following impact pathways are present: Atmospheric pollution Water Quality Water Quantity Level and Flow



PROJECT	
Tonbridge and Malling Local Plan HRA	
CLIENT	
Tonbridge and Malling Borough Council	
CONSULTANT	
AECOM Limited 2 City Walk Holbeck, Leeds LS11 9AR www.aecom.com	
LEGEND	
	Tonbridge and Malling Borough Council
	10km Study Area
	Special Area of Conservation (SAC)
	Special Protection Area (SPA)
	Ramsar
NOTES	
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ISSUE PURPOSE	
FINAL	
PROJECT NUMBER	
60711164	
FIGURE TITLE	
Habitat Sites	
FIGURE NUMBER	
Figure 1	

Appendix B Air Quality Modelling Results

Transect / Receptor	Total Annual Mean NOx (µg/m³)				Total Annual Mean NH3 (µg/m³)				Total Annual Mean N Dep (kgN/ha/yr)				Total Annual Mean N Acid Dep (keq/ha/yr)			
	2019	2039	2039	2039	2019	2039	2039	2039	2019	2039	2039	2039	2019	2039	2039	2039
	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS	Base	FB	DM	DS
E01a_0.00124532559000023m	38.19	9.48	9.60	9.60	0.93	0.79	0.81	0.81	31.91	26.17	26.27	26.28	2.28	1.87	1.88	1.88
E01a_10m	22.94	7.61	7.66	7.66	0.63	0.57	0.57	0.57	27.67	24.14	24.19	24.19	1.98	1.72	1.73	1.73
E01a_20m	18.39	7.05	7.08	7.08	0.54	0.50	0.50	0.50	26.37	23.53	23.57	23.57	1.88	1.68	1.68	1.68
E01a_30m	16.15	6.77	6.80	6.80	0.50	0.47	0.47	0.47	25.72	23.24	23.26	23.26	1.84	1.66	1.66	1.66
E01a_40m	14.80	6.61	6.63	6.63	0.47	0.45	0.45	0.45	25.32	23.06	23.08	23.08	1.81	1.65	1.65	1.65
E01a_50m	13.89	6.50	6.51	6.51	0.45	0.43	0.44	0.44	25.06	22.94	22.95	22.95	1.79	1.64	1.64	1.64
E01a_60m	13.24	6.42	6.43	6.43	0.44	0.42	0.43	0.43	24.87	22.85	22.86	22.86	1.78	1.63	1.63	1.63
E01a_70m	12.74	6.35	6.37	6.37	0.43	0.42	0.42	0.42	24.72	22.78	22.79	22.80	1.77	1.63	1.63	1.63
E01a_80m	12.36	6.31	6.32	6.32	0.42	0.41	0.41	0.41	24.61	22.73	22.74	22.74	1.76	1.62	1.62	1.62
E01a_90m	12.05	6.27	6.28	6.28	0.42	0.41	0.41	0.41	24.52	22.69	22.70	22.70	1.75	1.62	1.62	1.62
E01a_100m	11.80	6.24	6.25	6.25	0.41	0.40	0.40	0.40	24.44	22.66	22.67	22.67	1.75	1.62	1.62	1.62
E01a_110m	11.59	6.21	6.22	6.22	0.41	0.40	0.40	0.40	24.38	22.63	22.64	22.64	1.74	1.62	1.62	1.62
E01a_120m	11.41	6.19	6.20	6.20	0.41	0.40	0.40	0.40	24.33	22.61	22.61	22.61	1.74	1.61	1.62	1.62
E01a_130m	11.26	6.17	6.18	6.18	0.40	0.40	0.40	0.40	24.28	22.59	22.59	22.59	1.73	1.61	1.61	1.61
E01a_140m	11.13	6.16	6.16	6.16	0.40	0.39	0.39	0.39	24.25	22.57	22.57	22.57	1.73	1.61	1.61	1.61
E01a_150m	11.02	6.14	6.15	6.15	0.40	0.39	0.39	0.39	24.21	22.55	22.56	22.56	1.73	1.61	1.61	1.61
E01a_160m	10.92	6.13	6.14	6.14	0.40	0.39	0.39	0.39	24.18	22.54	22.55	22.55	1.73	1.61	1.61	1.61
E01a_170m	10.84	6.12	6.12	6.12	0.39	0.39	0.39	0.39	24.16	22.53	22.53	22.53	1.73	1.61	1.61	1.61
E01a_180m	10.76	6.11	6.11	6.11	0.39	0.39	0.39	0.39	24.14	22.52	22.52	22.52	1.72	1.61	1.61	1.61
E01a_190m	10.69	6.10	6.11	6.11	0.39	0.39	0.39	0.39	24.12	22.51	22.51	22.51	1.72	1.61	1.61	1.61
E01a_190m	10.69	6.10	6.11	6.11	0.39	0.39	0.39	0.39	24.12	22.51	22.51	22.51	1.72	1.61	1.61	1.61
E01a_200m	10.63	6.10	6.10	6.10	0.39	0.39	0.39	0.39	24.10	22.50	22.51	22.51	1.72	1.61	1.61	1.61
E01a_200m	10.63	6.10	6.10	6.10	0.39	0.39	0.39	0.39	24.10	22.50	22.51	22.51	1.72	1.61	1.61	1.61

E01b_0.00181090007000062m	38.16	9.48	9.59	9.60	0.93	0.79	0.81	0.81	31.90	26.16	26.27	26.28	2.28	1.87	1.88	1.88
E01b_10m	23.22	7.64	7.70	7.70	0.64	0.57	0.58	0.58	27.75	24.18	24.23	24.23	1.98	1.73	1.73	1.73
E01b_20m	18.65	7.08	7.12	7.12	0.55	0.50	0.51	0.51	26.44	23.57	23.60	23.61	1.89	1.68	1.69	1.69
E01b_30m	16.42	6.81	6.83	6.83	0.50	0.47	0.47	0.47	25.79	23.27	23.30	23.30	1.84	1.66	1.66	1.66
E01b_40m	15.08	6.64	6.66	6.66	0.48	0.45	0.45	0.45	25.40	23.09	23.12	23.12	1.81	1.65	1.65	1.65
E01b_50m	14.18	6.53	6.55	6.55	0.46	0.44	0.44	0.44	25.15	22.97	22.99	22.99	1.80	1.64	1.64	1.64
E01b_60m	13.54	6.45	6.47	6.47	0.45	0.43	0.43	0.43	24.96	22.89	22.90	22.90	1.78	1.64	1.64	1.64
E01b_70m	13.06	6.39	6.41	6.41	0.44	0.42	0.42	0.42	24.81	22.83	22.84	22.84	1.77	1.63	1.63	1.63
E01b_80m	12.68	6.35	6.36	6.36	0.43	0.42	0.42	0.42	24.70	22.77	22.79	22.79	1.76	1.63	1.63	1.63
E01b_90m	12.37	6.31	6.32	6.32	0.42	0.41	0.41	0.41	24.61	22.73	22.74	22.75	1.76	1.62	1.62	1.62
E01b_100m	12.12	6.28	6.29	6.29	0.42	0.41	0.41	0.41	24.54	22.70	22.71	22.71	1.75	1.62	1.62	1.62
E01b_110m	11.91	6.25	6.26	6.26	0.42	0.41	0.41	0.41	24.47	22.67	22.68	22.68	1.75	1.62	1.62	1.62
E01b_120m	11.73	6.23	6.24	6.24	0.41	0.40	0.40	0.40	24.42	22.65	22.66	22.66	1.74	1.62	1.62	1.62
E01b_130m	11.58	6.21	6.22	6.22	0.41	0.40	0.40	0.40	24.38	22.63	22.64	22.64	1.74	1.62	1.62	1.62
E01b_140m	11.44	6.19	6.20	6.20	0.41	0.40	0.40	0.40	24.34	22.61	22.62	22.62	1.74	1.62	1.62	1.62
E01b_150m	11.33	6.18	6.19	6.19	0.40	0.40	0.40	0.40	24.30	22.60	22.60	22.60	1.74	1.61	1.61	1.61
E01b_160m	11.22	6.17	6.17	6.17	0.40	0.39	0.40	0.40	24.27	22.58	22.59	22.59	1.73	1.61	1.61	1.61
E01b_170m	11.13	6.16	6.16	6.16	0.40	0.39	0.39	0.39	24.25	22.57	22.57	22.57	1.73	1.61	1.61	1.61
E01b_180m	11.05	6.15	6.15	6.15	0.40	0.39	0.39	0.39	24.22	22.56	22.56	22.56	1.73	1.61	1.61	1.61
E01b_190m	10.98	6.14	6.14	6.14	0.40	0.39	0.39	0.39	24.20	22.55	22.55	22.55	1.73	1.61	1.61	1.61
E01b_200m	10.91	6.13	6.13	6.13	0.40	0.39	0.39	0.39	24.18	22.54	22.54	22.55	1.73	1.61	1.61	1.61
E01c_1.7153721652m	33.65	8.94	9.04	9.04	0.85	0.73	0.74	0.74	30.69	25.58	25.67	25.68	2.19	1.83	1.83	1.83
E01c_10m	23.26	7.67	7.72	7.72	0.64	0.58	0.58	0.58	27.78	24.20	24.25	24.26	1.98	1.73	1.73	1.73
E01c_20m	18.64	7.10	7.14	7.14	0.55	0.51	0.51	0.51	26.46	23.59	23.62	23.62	1.89	1.68	1.69	1.69
E01c_30m	16.41	6.82	6.85	6.85	0.51	0.48	0.48	0.48	25.81	23.29	23.32	23.32	1.84	1.66	1.67	1.67
E01c_40m	15.08	6.66	6.68	6.68	0.48	0.46	0.46	0.46	25.43	23.12	23.14	23.14	1.82	1.65	1.65	1.65

E01c_50m	14.20	6.55	6.57	6.57	0.46	0.44	0.45	0.45	25.17	23.00	23.01	23.01	1.80	1.64	1.64	1.64
E01c_60m	13.57	6.48	6.49	6.49	0.45	0.43	0.44	0.44	24.98	22.91	22.93	22.93	1.78	1.64	1.64	1.64
E01c_70m	13.09	6.42	6.43	6.43	0.44	0.43	0.43	0.43	24.84	22.85	22.86	22.86	1.77	1.63	1.63	1.63
E01c_80m	12.72	6.37	6.38	6.38	0.44	0.42	0.42	0.42	24.74	22.80	22.81	22.81	1.77	1.63	1.63	1.63
E01c_90m	12.42	6.34	6.35	6.35	0.43	0.42	0.42	0.42	24.65	22.76	22.77	22.77	1.76	1.63	1.63	1.63
E01c_100m	12.18	6.30	6.31	6.32	0.42	0.41	0.41	0.41	24.58	22.73	22.74	22.74	1.76	1.62	1.62	1.62
E01c_110m	11.97	6.28	6.29	6.29	0.42	0.41	0.41	0.41	24.52	22.70	22.71	22.71	1.75	1.62	1.62	1.62
E01c_120m	11.80	6.26	6.27	6.27	0.42	0.41	0.41	0.41	24.46	22.68	22.69	22.69	1.75	1.62	1.62	1.62
E01c_130m	11.65	6.24	6.25	6.25	0.41	0.41	0.41	0.41	24.42	22.66	22.66	22.66	1.74	1.62	1.62	1.62
E01c_140m	11.52	6.22	6.23	6.23	0.41	0.40	0.40	0.40	24.38	22.64	22.65	22.65	1.74	1.62	1.62	1.62
E01c_150m	11.40	6.21	6.22	6.22	0.41	0.40	0.40	0.40	24.35	22.62	22.63	22.63	1.74	1.62	1.62	1.62
E01c_160m	11.30	6.20	6.20	6.20	0.41	0.40	0.40	0.40	24.32	22.61	22.62	22.62	1.74	1.62	1.62	1.62
E01c_170m	11.21	6.19	6.19	6.19	0.41	0.40	0.40	0.40	24.29	22.60	22.61	22.61	1.73	1.61	1.61	1.61
E01c_180m	11.13	6.18	6.18	6.18	0.40	0.40	0.40	0.40	24.26	22.59	22.59	22.59	1.73	1.61	1.61	1.61
E01c_190m	11.06	6.17	6.17	6.17	0.40	0.40	0.40	0.40	24.24	22.58	22.59	22.59	1.73	1.61	1.61	1.61
E01c_200m	10.99	6.16	6.16	6.16	0.40	0.40	0.40	0.40	24.23	22.57	22.57	22.57	1.73	1.61	1.61	1.61
E02a_0.0292079707699999m	21.58	9.17	8.86	9.05	0.61	0.56	0.52	0.56	27.24	24.98	24.75	24.94	1.95	1.78	1.77	1.78
E02a_10m	16.26	8.54	8.42	8.49	0.51	0.49	0.47	0.49	26.36	24.56	24.46	24.54	1.88	1.75	1.75	1.75
E02a_20m	14.84	8.38	8.30	8.35	0.48	0.47	0.46	0.47	26.13	24.45	24.39	24.44	1.87	1.75	1.74	1.75
E02a_30m	14.19	8.30	8.25	8.28	0.47	0.46	0.45	0.46	26.02	24.40	24.35	24.39	1.86	1.74	1.74	1.74
E02a_40m	13.82	8.26	8.21	8.24	0.46	0.46	0.45	0.46	25.95	24.37	24.33	24.36	1.85	1.74	1.74	1.74
E02a_50m	13.58	8.23	8.19	8.22	0.46	0.45	0.45	0.45	25.92	24.35	24.32	24.34	1.85	1.74	1.74	1.74
E02a_60m	13.41	8.21	8.18	8.20	0.46	0.45	0.45	0.45	25.89	24.33	24.31	24.33	1.85	1.74	1.74	1.74
E02a_70m	13.28	8.20	8.17	8.19	0.45	0.45	0.45	0.45	25.87	24.32	24.30	24.32	1.85	1.74	1.74	1.74
E02a_80m	13.19	8.18	8.16	8.18	0.45	0.45	0.45	0.45	25.85	24.32	24.30	24.31	1.85	1.74	1.74	1.74
E02a_90m	13.11	8.18	8.16	8.17	0.45	0.45	0.44	0.45	25.84	24.31	24.30	24.31	1.85	1.74	1.74	1.74

E02a_100m	13.05	8.17	8.15	8.16	0.45	0.45	0.44	0.45	25.83	24.31	24.29	24.30	1.84	1.74	1.74	1.74
E02a_110m	13.00	8.16	8.15	8.16	0.45	0.45	0.44	0.45	25.82	24.30	24.29	24.30	1.84	1.74	1.73	1.74
E02a_120m	12.96	8.16	8.14	8.15	0.45	0.45	0.44	0.45	25.81	24.30	24.29	24.30	1.84	1.74	1.73	1.74
E02a_130m	12.92	8.15	8.14	8.15	0.45	0.44	0.44	0.44	25.80	24.30	24.29	24.29	1.84	1.74	1.73	1.74
E02a_140m	12.89	8.15	8.14	8.15	0.45	0.44	0.44	0.44	25.80	24.29	24.28	24.29	1.84	1.74	1.73	1.74
E02a_150m	12.86	8.15	8.13	8.14	0.45	0.44	0.44	0.44	25.79	24.29	24.28	24.29	1.84	1.73	1.73	1.73
E02a_160m	12.83	8.14	8.13	8.14	0.45	0.44	0.44	0.44	25.79	24.29	24.28	24.29	1.84	1.73	1.73	1.73
E02a_170m	12.81	8.14	8.13	8.14	0.45	0.44	0.44	0.44	25.79	24.29	24.28	24.29	1.84	1.73	1.73	1.73
E02a_180m	12.79	8.14	8.13	8.14	0.44	0.44	0.44	0.44	25.78	24.29	24.28	24.28	1.84	1.73	1.73	1.73
E02a_190m	12.77	8.14	8.13	8.13	0.44	0.44	0.44	0.44	25.78	24.28	24.28	24.28	1.84	1.73	1.73	1.73
E02a_200m	12.76	8.13	8.13	8.13	0.44	0.44	0.44	0.44	25.78	24.28	24.28	24.28	1.84	1.73	1.73	1.73
E02b_0.00372659980000023m	21.15	9.12	8.83	9.00	0.61	0.56	0.52	0.55	16.78	13.89	13.55	13.82	1.20	0.99	0.97	0.99
E02b_10m	16.28	8.55	8.42	8.50	0.51	0.49	0.47	0.49	15.39	13.29	13.14	13.26	1.10	0.95	0.94	0.95
E02b_20m	14.87	8.38	8.30	8.35	0.48	0.47	0.46	0.47	14.98	13.12	13.02	13.10	1.07	0.94	0.93	0.94
E02b_30m	14.22	8.31	8.25	8.28	0.47	0.46	0.46	0.46	14.80	13.03	12.97	13.02	1.06	0.93	0.93	0.93
E02b_40m	13.85	8.26	8.22	8.25	0.47	0.46	0.45	0.46	14.69	12.99	12.94	12.98	1.05	0.93	0.92	0.93
E02b_50m	13.61	8.23	8.20	8.22	0.46	0.45	0.45	0.45	14.62	12.96	12.92	12.95	1.04	0.93	0.92	0.93
E02b_60m	13.44	8.21	8.18	8.20	0.46	0.45	0.45	0.45	14.57	12.94	12.90	12.93	1.04	0.92	0.92	0.92
E02b_70m	13.32	8.20	8.17	8.19	0.45	0.45	0.45	0.45	14.53	12.92	12.89	12.92	1.04	0.92	0.92	0.92
E02b_80m	13.22	8.19	8.17	8.18	0.45	0.45	0.45	0.45	14.51	12.91	12.88	12.91	1.04	0.92	0.92	0.92
E02b_90m	13.14	8.18	8.16	8.17	0.45	0.45	0.45	0.45	14.49	12.90	12.88	12.90	1.03	0.92	0.92	0.92
E02b_100m	13.08	8.17	8.15	8.17	0.45	0.45	0.44	0.45	14.47	12.90	12.87	12.89	1.03	0.92	0.92	0.92
E02b_110m	13.03	8.17	8.15	8.16	0.45	0.45	0.44	0.45	14.45	12.89	12.87	12.89	1.03	0.92	0.92	0.92
E02b_120m	12.98	8.16	8.15	8.16	0.45	0.45	0.44	0.45	14.44	12.88	12.86	12.88	1.03	0.92	0.92	0.92
E02b_130m	12.95	8.16	8.14	8.15	0.45	0.45	0.44	0.44	14.43	12.88	12.86	12.88	1.03	0.92	0.92	0.92
E02b_140m	12.91	8.15	8.14	8.15	0.45	0.44	0.44	0.44	14.42	12.88	12.86	12.87	1.03	0.92	0.92	0.92

E02b_150m	12.89	8.15	8.14	8.15	0.45	0.44	0.44	0.44	14.41	12.87	12.86	12.87	1.03	0.92	0.92	0.92
E02b_160m	12.86	8.15	8.14	8.14	0.45	0.44	0.44	0.44	14.40	12.87	12.86	12.87	1.03	0.92	0.92	0.92
E02b_170m	12.84	8.14	8.13	8.14	0.45	0.44	0.44	0.44	14.40	12.86	12.85	12.86	1.03	0.92	0.92	0.92
E02b_180m	12.82	8.14	8.13	8.14	0.45	0.44	0.44	0.44	14.39	12.86	12.85	12.86	1.03	0.92	0.92	0.92
E02b_190m	12.80	8.14	8.13	8.14	0.44	0.44	0.44	0.44	14.38	12.86	12.85	12.86	1.03	0.92	0.92	0.92
E02b_200m	12.78	8.14	8.13	8.13	0.44	0.44	0.44	0.44	14.38	12.86	12.85	12.86	1.03	0.92	0.92	0.92
E03a_0.0096323158999998m	20.54	9.72	10.03	10.10	0.55	0.51	0.55	0.56	26.23	23.66	23.99	24.09	1.87	1.69	1.71	1.72
E03a_10m	16.58	9.30	9.42	9.45	0.48	0.47	0.48	0.49	25.14	23.22	23.36	23.40	1.80	1.66	1.67	1.67
E03a_20m	15.67	9.20	9.28	9.30	0.47	0.46	0.47	0.47	24.89	23.12	23.21	23.24	1.78	1.65	1.66	1.66
E03a_30m	15.25	9.16	9.21	9.23	0.46	0.45	0.46	0.46	24.77	23.08	23.14	23.16	1.77	1.65	1.65	1.65
E03a_40m	15.02	9.13	9.17	9.19	0.45	0.45	0.45	0.46	24.71	23.05	23.10	23.12	1.76	1.65	1.65	1.65
E03a_50m	14.87	9.11	9.15	9.16	0.45	0.45	0.45	0.45	24.67	23.04	23.08	23.09	1.76	1.65	1.65	1.65
E03a_170m	14.43	9.07	9.08	9.08	0.44	0.44	0.44	0.44	24.55	22.99	23.00	23.01	1.75	1.64	1.64	1.64
E03a_180m	14.43	9.07	9.08	9.08	0.44	0.44	0.44	0.44	24.54	22.99	23.00	23.01	1.75	1.64	1.64	1.64
E03a_190m	14.42	9.07	9.07	9.08	0.44	0.44	0.44	0.44	24.54	22.99	23.00	23.00	1.75	1.64	1.64	1.64
E03a_200m	14.42	9.07	9.07	9.08	0.44	0.44	0.44	0.44	24.54	22.99	23.00	23.00	1.75	1.64	1.64	1.64
E03b_0.000695940260000194m	15.24	9.94	10.09	10.14	0.47	0.47	0.49	0.50	13.50	12.00	12.12	12.15	0.96	0.86	0.87	0.87
E03b_10m	15.24	9.94	9.98	10.00	0.47	0.47	0.47	0.48	13.50	12.00	12.03	12.05	0.96	0.86	0.86	0.86
E03b_20m	15.25	9.94	9.97	9.98	0.47	0.47	0.47	0.47	13.50	12.00	12.02	12.03	0.96	0.86	0.86	0.86
E03b_30m	15.26	9.94	9.96	9.97	0.47	0.47	0.47	0.47	13.51	12.00	12.01	12.02	0.96	0.86	0.86	0.86
E03b_40m	15.27	9.94	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.01	12.01	0.96	0.86	0.86	0.86
E03b_50m	15.28	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.96	0.86	0.86	0.86
E03b_60m	15.28	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_70m	15.29	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_80m	15.30	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.97	0.86	0.86	0.86

E03b_90m	15.31	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_100m	15.31	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.51	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_110m	15.32	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_120m	15.33	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_130m	15.34	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_140m	15.35	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_150m	15.35	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_160m	15.36	9.95	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_170m	15.37	9.96	9.95	9.96	0.47	0.47	0.47	0.47	13.52	12.00	12.00	12.01	0.97	0.86	0.86	0.86
E03b_180m	15.38	9.96	9.95	9.96	0.47	0.47	0.47	0.47	13.53	12.01	12.00	12.01	0.97	0.86	0.86	0.86
E03b_190m	15.39	9.96	9.95	9.96	0.47	0.47	0.47	0.47	13.53	12.01	12.00	12.01	0.97	0.86	0.86	0.86
E03b_200m	15.40	9.96	9.95	9.96	0.47	0.47	0.47	0.47	13.53	12.01	12.00	12.01	0.97	0.86	0.86	0.86
E03c_31.7954282541m	22.68	10.77	10.52	10.63	0.61	0.57	0.54	0.56	14.74	12.60	12.43	12.51	1.05	0.90	0.89	0.89
E03c_40m	21.37	10.62	10.42	10.50	0.59	0.55	0.53	0.54	14.52	12.49	12.35	12.42	1.04	0.89	0.88	0.89
E03c_50m	20.27	10.50	10.33	10.40	0.57	0.54	0.52	0.53	14.34	12.40	12.28	12.34	1.02	0.89	0.88	0.88
E03c_60m	19.49	10.41	10.26	10.33	0.55	0.53	0.51	0.52	14.21	12.34	12.24	12.28	1.02	0.88	0.87	0.88
E03c_70m	18.90	10.34	10.22	10.27	0.54	0.52	0.50	0.51	14.11	12.29	12.20	12.24	1.01	0.88	0.87	0.87
E03c_80m	18.44	10.29	10.18	10.23	0.53	0.51	0.50	0.51	14.04	12.25	12.17	12.21	1.00	0.88	0.87	0.87
E03c_90m	18.06	10.25	10.15	10.20	0.52	0.51	0.50	0.50	13.97	12.22	12.15	12.19	1.00	0.87	0.87	0.87
E03c_100m	17.76	10.22	10.13	10.17	0.52	0.50	0.49	0.50	13.92	12.20	12.14	12.17	0.99	0.87	0.87	0.87
E03c_110m	17.50	10.19	10.11	10.14	0.51	0.50	0.49	0.49	13.88	12.18	12.12	12.15	0.99	0.87	0.87	0.87
E03c_120m	17.28	10.16	10.09	10.12	0.51	0.50	0.49	0.49	13.84	12.16	12.11	12.13	0.99	0.87	0.86	0.87
E03c_130m	17.09	10.14	10.08	10.11	0.51	0.49	0.49	0.49	13.81	12.14	12.10	12.12	0.99	0.87	0.86	0.87
E03c_140m	16.92	10.12	10.06	10.09	0.50	0.49	0.48	0.49	13.78	12.13	12.09	12.11	0.98	0.87	0.86	0.86
E03c_150m	16.78	10.11	10.05	10.08	0.50	0.49	0.48	0.49	13.76	12.12	12.08	12.10	0.98	0.87	0.86	0.86
E03c_160m	16.65	10.09	10.04	10.07	0.50	0.49	0.48	0.48	13.74	12.11	12.07	12.09	0.98	0.86	0.86	0.86
E03c_170m	16.53	10.08	10.03	10.06	0.49	0.49	0.48	0.48	13.72	12.10	12.06	12.08	0.98	0.86	0.86	0.86

E03c_180m	16.43	10.07	10.03	10.05	0.49	0.48	0.48	0.48	13.70	12.09	12.06	12.08	0.98	0.86	0.86	0.86
E03c_190m	16.34	10.06	10.02	10.04	0.49	0.48	0.48	0.48	13.69	12.08	12.05	12.07	0.98	0.86	0.86	0.86
E03c_200m	16.25	10.05	10.01	10.03	0.49	0.48	0.48	0.48	13.67	12.08	12.05	12.06	0.98	0.86	0.86	0.86
E04a_164.971685037m	24.11	12.45	12.54	12.58	0.84	0.77	0.81	0.82	29.10	26.15	26.43	26.56	2.08	1.87	1.89	1.90
E04a_170m	23.90	12.43	12.51	12.55	0.83	0.77	0.80	0.81	29.00	26.09	26.35	26.48	2.07	1.86	1.88	1.89
E04a_180m	23.48	12.37	12.45	12.49	0.81	0.75	0.78	0.79	28.78	25.94	26.20	26.31	2.06	1.85	1.87	1.88
E04a_190m	23.08	12.32	12.40	12.43	0.79	0.73	0.76	0.78	28.58	25.81	26.05	26.16	2.04	1.84	1.86	1.87
E04a_200m	22.70	12.27	12.34	12.37	0.77	0.72	0.74	0.76	28.38	25.68	25.91	26.01	2.03	1.83	1.85	1.86
E05a_10.7316962862m	99.20	22.77	24.08	24.11	2.11	1.73	1.88	1.89	47.38	35.59	36.91	36.99	3.38	2.54	2.64	2.64
E05a_20m	76.90	19.79	20.74	20.77	1.67	1.39	1.50	1.50	42.07	32.54	33.49	33.55	3.00	2.32	2.39	2.40
E05a_30m	63.55	18.02	18.76	18.78	1.40	1.19	1.27	1.27	38.76	30.71	31.46	31.50	2.77	2.19	2.25	2.25
E05a_40m	54.97	16.88	17.49	17.51	1.23	1.05	1.12	1.13	36.56	29.53	30.15	30.19	2.61	2.11	2.15	2.16
E05a_50m	48.94	16.08	16.60	16.62	1.12	0.96	1.02	1.02	34.99	28.70	29.23	29.26	2.50	2.05	2.09	2.09
E05a_60m	44.39	15.48	15.93	15.95	1.03	0.89	0.94	0.95	33.78	28.08	28.54	28.56	2.41	2.01	2.04	2.04
E05a_70m	40.83	15.01	15.41	15.42	0.96	0.84	0.88	0.89	32.82	27.59	28.00	28.02	2.34	1.97	2.00	2.00
E05a_80m	37.95	14.63	14.99	15.00	0.90	0.79	0.83	0.84	32.04	27.20	27.56	27.58	2.29	1.94	1.97	1.97
E05a_90m	35.56	14.32	14.63	14.64	0.85	0.76	0.79	0.80	31.39	26.87	27.19	27.21	2.24	1.92	1.94	1.94
E05a_100m	33.55	14.05	14.34	14.35	0.81	0.73	0.76	0.76	30.83	26.59	26.89	26.90	2.20	1.90	1.92	1.92
E05a_110m	31.83	13.83	14.09	14.10	0.78	0.70	0.73	0.73	30.36	26.36	26.63	26.64	2.17	1.88	1.90	1.90
E05a_120m	30.35	13.63	13.87	13.88	0.75	0.68	0.71	0.71	29.94	26.16	26.40	26.42	2.14	1.87	1.89	1.89
E05a_130m	29.06	13.46	13.68	13.69	0.72	0.66	0.68	0.69	29.58	25.98	26.20	26.21	2.11	1.86	1.87	1.87
E05a_140m	27.92	13.31	13.51	13.52	0.70	0.64	0.66	0.67	29.26	25.82	26.03	26.04	2.09	1.84	1.86	1.86
E05a_150m	26.92	13.18	13.37	13.37	0.68	0.63	0.65	0.65	28.98	25.69	25.88	25.89	2.07	1.83	1.85	1.85
E05a_160m	26.03	13.06	13.23	13.24	0.66	0.61	0.63	0.63	28.73	25.56	25.74	25.75	2.05	1.83	1.84	1.84
E05a_170m	25.24	12.96	13.12	13.12	0.65	0.60	0.62	0.62	28.50	25.45	25.62	25.63	2.04	1.82	1.83	1.83
E05a_180m	24.53	12.87	13.01	13.02	0.63	0.59	0.61	0.61	28.30	25.36	25.51	25.52	2.02	1.81	1.82	1.82
E05a_190m	23.89	12.78	12.92	12.92	0.62	0.58	0.60	0.60	28.12	25.27	25.41	25.42	2.01	1.81	1.81	1.82

E05a_200m	23.31	12.70	12.83	12.84	0.61	0.57	0.59	0.59	27.95	25.19	25.32	25.33	2.00	1.80	1.81	1.81
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