

Tonbridge and Malling Local Plan 2042

Impact Assessment Report

Tonbridge and Malling Borough Council

October 2025

Quality information

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1. Introduction

Purpose

- 1.1 AECOM has been commissioned by Tonbridge and Malling Borough Council (TMBC) to provide an Equality Impact Assessment (EqIA) and Health Impact Assessment (HIA) of the potential impacts associated with Tonbridge and Malling Local Plan 2042 (Local Plan). This Impact Assessment report will support TMBC to fulfil and demonstrate its duties and satisfy the requirements in relation to:
 - The Equality Act 2010, in particular Section 149 of the Public Sector Equality Duty (PSED)¹; and
 - Health Impact Assessment in spatial planning guidance.²
- 1.2 An EqIA is a systematic assessment of the effects of plans or policies on groups with protected characteristics as defined by the Equality Act 2010. As a public body, TMBC has a legal duty when creating new plans and policies to pay due regard to the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010. The PSED aims to eliminate unlawful discrimination, promote equality and cohesion between different groups and advance equality of opportunity.
- 1.3 The purpose of a Health Impact Assessment (HIA) is to support local authority decision-makers in assessing the significance of health effects of a plan or project. The assessment aims to identify impacts on populations and health determinants to assess how new plans and policies may reduce or exacerbate health inequalities.
- 1.4 These Impact Assessments demonstrates how the aims of the PSED and health determinants have been considered and taken into account by TMBC as part of the planning process. The approach draws on evidence from secondary data sources to provide an assessment of potential adverse and beneficial equality and health impacts associated with the Local Plan policies.

Local Plan 2042

- 1.5 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 and Malling.
- 1.6 The Local Plan is a strategy document that provides a positive vision for the future of Tonbridge and 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. The Local Plan covers the Borough up to 2042 and applies to the administrative boundary of TMBC.

¹ UK Government (2010). Equality Act 2010. Available at: [Equality Act 2010](#)

² Public Health England (2020). Health Impact Assessment in spatial planning. Available at: [Health Impact Assessment in spatial planning - GOV.UK](#)

Report structure

1.7 Following on from this introduction section, the remainder of the report is structured as follows:

- **Chapter 2: Methodology** – sets out the approach to collecting evidence and the assessment of impacts;
- **Chapter 3: Legislation and policy review** – providing context through relevant legislation and national, regional, and local policy associated with equalities, transport, and local plans;
- **Chapter 3: Evidence base** – using secondary data sources such as Census 2021 data to form an understanding of protected characteristic groups and public health in Tonbridge and Malling and highlight key issues and evidence informed by available project documentation;
- **Chapter 4: Assessment of Impacts** – presents an assessment of the potential adverse and beneficial impacts of the Local Plan related to equalities and health informed by the evidence gathered in the baseline and key issues and evidence; and
- **Chapter 5: Conclusions and recommendations** – provides a summary of the key findings and proposed recommendations to enhance the positive impacts and minimise the negative impacts.

2. Methodology

Introduction

- 2.1 This section sets out the approach to assessing the equality and health impacts of the Local Plan. The assessment considers how the Local Plan could impact (both positively and negatively) current residents and future residents of the local area, including those who share protected characteristics.
- 2.2 The approach for undertaking these Impact Assessments and compiling this report follows a four-stage process:
 1. **Screening assessment** – an initial screening assessment was undertaken in September 2023 providing an overview of relevant legislation and policy, an equalities, public health and community safety baseline of Tonbridge and Malling and an initial screening of the potential impacts including a framework for a more detailed assessment of impacts. The initial screening was reviewed for its relevance prior to the drafting of the Impact Assessment Report.
 2. **Scoping of Local Plan policies** – internal scoping exercise assessing the relevance of the Local Plan policies to the Equality Act 2010 and HIA spatial planning guidance to identify potential equality and health and wellbeing impacts to be explored further in the full impact assessments.
 3. **Assessment of impacts** – an assessment of the potential equality and health impacts informed by a consideration of the policy context, an equalities and health baseline and key issues and evidence.
 4. **Development of conclusions** – a synthesis of key equality and health impacts against the assessment framework and proposed recommendations.

Screening Assessment

- 2.3 A Screening Assessment was prepared by AECOM in September 2023. The purpose of this screening was to later inform completion of a full EqIA and HIA of the Tonbridge and Malling Local Plan 2042. This was the initial step in supporting compliance with the Public Sector Equality Duty, requirements of the HIA spatial planning guidance and Section 17 of the Crime and Disorder Act 1998.
- 2.4 The Screening Assessment followed a three-stage process in identifying a baseline of key evidence and issues relating to groups with protected characteristics and health; outlining the potential equality and health impacts of the Local Plan; and suggesting next steps to inform the full Impact Assessment report. This process is set out in the following sections.

Desk-based review

- 2.5 As part of the Screening Assessment, a legislation and policy review was undertaken to provide context for the assessments by examining relevant national, regional, and local frameworks related to equalities, transport, and spatial planning. This included identifying statutory duties, strategic priorities, and policy drivers that shape the development and implementation of the Local Plan.
- 2.6 The desk-based review also involved analysing secondary data sources, including Census 2021 data, to establish baseline profiles for Tonbridge and Malling in relation to equalities, public health, and community safety. This included a comparison of protected characteristic groups against national averages, an assessment of physical and mental health needs, and an overview of crime patterns across the borough.

- 2.7 In addition, key evidence and issues were identified through a review of project documentation such as the Regulation 18 Local Plan, Housing Needs Survey, and Gypsy and Traveller Accommodation Assessment, providing context for the full Impact Assessments to be undertaken. The evidence base was later updated in October 2025 when the Strategic Housing Market Assessment (SHMA) and updated Gypsy and Traveller Accommodation Assessment (GTAA) became available.

Screening of potential impacts

- 2.8 The screening identified some of the potential positive and negative impacts associated with the Local Plan. This initial screening of impacts drew on the borough's baseline profiles for equality and health as well as a review of relevant project documentation and wider supporting evidence. The screening identified the following potential impacts: increased housing provision; improvements to the active travel network; investment in the road transport network; investment in public transport; carbon emission reductions; and increase in air and noise pollution caused by new developments.
- 2.9 A proposed assessment framework for assessing the screened impacts and others in the full Impact Assessments was also set out. The assessment of impacts within this report builds on the equality and health objectives outlined in the assessment framework (see Table 2-1 below).
- 2.10 The initial screening was reviewed for its relevance prior to the drafting of the Impact Assessment Report.

Table 2-1: Assessment Framework

Impact Assessment	Objectives
Equality Impact Assessment	Demonstrate clear, transparent, inclusive and meaningful engagement with local residents, stakeholders and the local community.
	Assess how changes to housing provision impact protected characteristic groups.
	Assess how community facilities may be developed to benefit protected characteristic users.
	Determine impacts of changes to the road transport network and active travel network on protected characteristic groups.
	Assess the impact of agricultural, green infrastructure, open space and climate change evidence and development on protected characteristic groups.
	Provide insight to potential employment opportunities for disadvantaged and underrepresented groups.
	Ensure any negative impacts on protected characteristic groups are mitigated.
	Review and take into account the Statement of Community Involvement (SCI), Interim Infrastructure Delivery Plan (IDP), and consultation responses to the Equalities Questionnaire when assessing the potential equality impacts.

Impact Assessment Objectives

Health Impact Assessment

Demonstrate clear, transparent, inclusive and meaningful engagement with local residents, stakeholders and the local community.

Determine impacts of changes to the road transport network and active travel network on the health of local residents.

Assess the impact on local health of reduction in carbon emissions as a result of the plan.

Ensure any negative impacts on local health are mitigated.

Next steps

- 2.11 The Screening Assessment outlined next steps to support the development of the full Impact Assessments for the Local Plan.
- 2.12 This included expanding the baseline and key issues and evidence through additional data collection and analysis, as well as engagement with local groups and stakeholders likely to be affected by the Local Plan. In addition to continued review of project documentation and secondary data sources to update the full Impact Assessments as new evidence and insights become available.

Scoping of policies

- 2.13 TMBC provided the policies within the Local Plan, organised across nine key themes: design, economic development, town centres, historic environment, housing, infrastructure, climate change, natural environment, and rural areas.
- 2.14 Prior to undertaking the full Impact Assessments, an initial scoping exercise was undertaken to determine the relevance of each policy to the Equality Act 2010 and HIA spatial planning guidance. Each policy was reviewed to identify its potential to influence equality, health, and wellbeing outcomes. This process informed the selection of policies for further assessment in the full Impact Assessments. Policies considered not relevant for detailed assessment were scoped out, with justifications provided throughout **Chapter 5**.
- 2.15 In addition to the thematic policies, TMBC also provided the overarching objectives of the Local Plan. These were not assessed individually, as their associated impacts are addressed under the relevant thematic areas outlined in Table 2-2.

Table 2-2: Objectives of the Local Plan

Objective	Thematic Area addressed
Objective 1 - Ensure development makes a significant contribution towards meeting long term emissions reduction goals of net zero by 2050, utilising land and materials efficiently and mitigating against and improving resilience to climate change in the borough.	The potential impacts of improving resilience to climate change are assessed under the Climate Change Policies: Policy CC1-CC8
Objective 2 - Protect and enhance our built and natural environment with new development ensuring high	The potential impacts of protecting the built and natural

Objective	Thematic Area addressed
quality design including respecting our valued landscapes and historic environment and delivering net gains in biodiversity.	environment in Tonbridge and Malling are assessed under the Natural Environment Policies: Policy NE1-NE12 and the Historic Environment Policies: Policy HE1-HE6 .
Objective 3 - Provide homes of a high quality, range and standard to meet our community's needs.	The potential impacts of the provision of new homes are considered under Housing Policies: Policy H1-H10
Objective 4 - Sustaining and providing excellent social infrastructure to support community health and well-being and incorporate design principles which will assist in improving access and community safety.	The potential impacts on community wellbeing and safety in design are considered under Design Policies: Policy D1-D2
Objective 5 - Maintain a thriving economy with an enhanced range of premises in which businesses can grow and invest to support employment opportunities.	The potential impacts on local businesses and employment are considered under Economic Policies: Policy E1-E4
Objective 6 - Support and improve the range of services and facilities within our town and village centres to increase footfall and to meet growing and changing community and visitor needs, keeping valued centres occupied and vibrant.	The potential impacts of enhancing the town centre are considered under Economy Policies: Policy E5-E8
Objective 7 - Prioritise sustainable transport and active travel options alongside the timely delivery of required physical and digital infrastructure to support growth.	The potential impacts of sustainable and active travel infrastructure are considered under Infrastructure Policies: Policy INF1-INF5

Assessment of Impacts

2.16 The full Impact Assessments were undertaken using information gathered through the desk-based review and updated with the most recent data available. The assessment of impacts considers the potential adverse and beneficial impacts of the Local Plan policies scoped into the assessment.

2.17 The EqIA considers the potential impacts on protected characteristic groups as defined in the Equality Act 2010:

- **Age:** This refers to persons defined by either a particular age or a range of ages;
- **Disability:** A disabled person is someone who has a physical or mental impairment (lasting more than a year) that has a substantial adverse effect on their ability to carry out normal day-to-day activities;
- **Gender Reassignment:** This refers to a person who is proposing to undergo, is undergoing, or has undergone a process for the purpose of reassigning their gender identity;

- **Marriage and Civil Partnership:** Marriage can be between a man and a woman or between two people of the same sex. Civil partners must not be treated less favourably than married couples;
- **Pregnancy and Maternity:** Pregnancy is the condition of being pregnant and expecting a baby. Maternity refers to the period after the birth. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth; Race: Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Race:** Under the Equality Act 2010 race includes colour, nationality (including citizenship) and ethnic or national origins;
- **Religion or Belief:** Religion means any religion and a reference to religion includes a reference to a lack of religion. Belief means any religious or philosophical belief and a reference to belief includes a reference to a lack of belief;
- **Sex:** This refers to a man or to a woman, or to a group of people of the same sex; and,
- **Sexual Orientation:** this means a person's sexual orientation towards persons of the same sex, persons of the opposite sex, or persons of either sex.

2.18 Although income is not classed as a protected characteristic under the Equality Act 2010, the assessment of equality impacts also considers the additional impact of disproportionate and differential effects on those groups with protected characteristics from low-income households.

2.19 The EqIA considers differential and disproportionate impacts, defined as follows:

- **Differential impacts** – i.e. an impact that affects members of a protected characteristic group differently from the rest of the general population because of specific needs, or a recognised vulnerability or sensitivity associated with their protected characteristic.
- **Disproportionate impacts** – i.e. an impact that has a proportionately greater effect on a protected characteristic group than on the general population overall within Tonbridge and Malling due to a greater presence of that group. In some cases, protected characteristic groups may be subject to both differential and disproportionate equality effects.

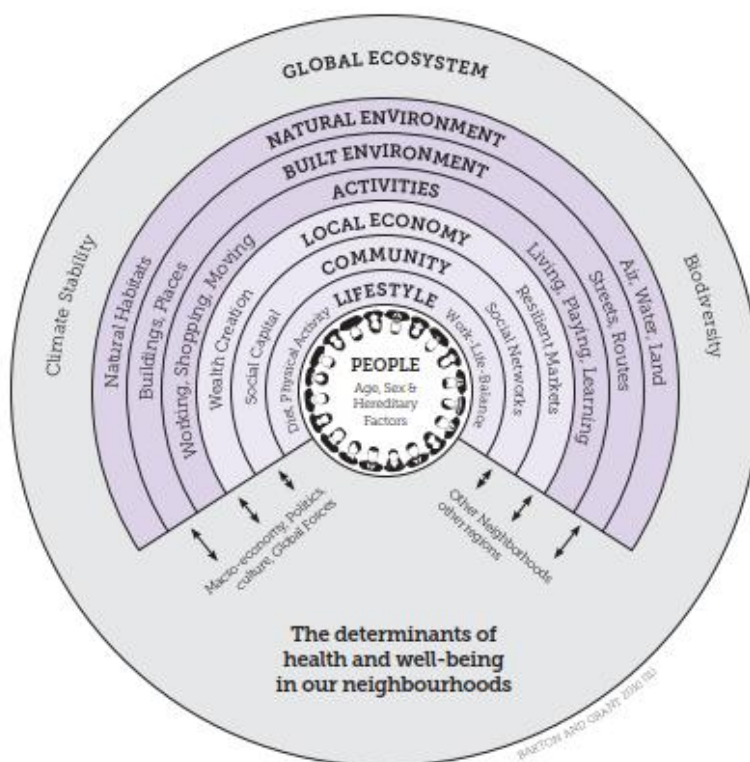
2.20 The HIA considers the potential for the Local Plan policies to influence physical and mental health and create an environment that fosters better health outcomes for all residents across the borough. In-line with the Health Impact Assessment in spatial planning guide³ consideration has been given to NHS England's Healthy Urban Development Unit's (HUDU) Rapid Health Impact Assessment (HIA) Toolkit (2019) to assist with the identification of relevant health determinants and mapping of health pathways.

2.21 The health and wellbeing of individuals is determined by a broad range of individual constitutional and behavioural factors (or 'determinants'), as well as broader environmental, social and economic factors. Some factors are direct and obvious,

³ Public Health England (2020). Health Impact Assessment in spatial planning. Available at: [Health Impact Assessment in spatial planning - GOV.UK](#)

others are indirect. Figure 2-1 below sets out the determinants of health considered in assessing impacts of the Local Plan policies.

Figure 2-1 Determinants of Health in Neighbourhoods⁴



2.22 The equality and health impacts associated with the Local Plan have been assessed thematically and consider the impacts of each policy scoped into the assessment. The assessment of impacts also reflects on the key objectives outlined in the assessment framework throughout (see Table 2-1).

Conclusions and recommendations

2.23 The conclusions are structured thematically, aligning with the assessment of impacts, to summarise the potential equality and health impacts of the Local Plan. The conclusions aim to highlight both positive and negative effects, with proposed recommendations to enhance positive outcomes and mitigate any adverse impacts.

2.24 This demonstrates how the Council have fulfilled its Public Sector Equality Duty (PSED) by actively considering the needs of different groups throughout the planning process and aligns with the requirements of the Health Impact Assessment (HIA) spatial planning guidance, ensuring that health and wellbeing considerations are embedded in decision-making and policy development.

⁴ Barton, H. & Grant, M. (2006). A health map for the local human habitat. The Journal for the Royal Society for the Promotion of Health, 126 (6). Pp.252-253.

3. Legislation and policy review

Legislation and Guidance

Equality Act 2010 and the Public Sector Equality Duty (PSED)⁵

- 3.1 The Equality Act 2010 is a major piece of UK legislation which provides the framework to protect the rights of individuals against unlawful discrimination and to advance equal opportunities for all. Section 149 of the Equality Act sets out the PSED to which Westminster City Council, as a public body, is subject to in carrying out all its functions.
- 3.2 Those subject to the PSED must, in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;
 - Advance equality of opportunity between people who share a protected characteristic and those who do not; and
 - Foster good relations between people who share a protected characteristic and those who do not.
- 3.3 These are sometimes referred to as the three aims or arms of the PSED. The Act explains that having due regard for advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people; and
 - Encouraging people from protected characteristics groups to participate in public life or in other activities where their participation is disproportionately low.
- 3.4 The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.
- 3.5 The duty covers the following eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation as described in **Section 2.4**.
- 3.6 Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status. This means that the first arm of the duty applies to this characteristic, but that the other arms (advancing equality and fostering good relations) do not apply.

⁵ UK Government (2010). Equality Act 2010. Available at: [Equality Act 2010](#) (Last accessed 05/09/2025)

Health Impact Assessment in spatial planning: a guide for local authority public health and planning teams⁶

- 3.7 The Health Impact Assessment in spatial planning guidance provides a systematic approach for local authority public health and planning teams to identify and address health issues and aim to improve community well-being. Using HIAs enables local action on the wider determinants of health, such as air and water quality, access to green spaces, transportation, and social determinants of health. By integrating health considerations into spatial planning, HIAs promote healthier environments, equitable access to resources, and informed decision-making for sustainable and inclusive communities. Section 2.4 sets out the determinants of health considered in assessing impacts of the Local Plan policies.

National policy

National Planning Policy Framework (December 2024)⁷

- 3.8 The National Planning Policy Framework (NPPF) was originally published in March 2012, with revisions between July 2018-December 2023 and most recently, December 2024.
- 3.9 The NPPF (2024) consolidates the economic, social and environmental planning policies for England into a single document and described how it expects these to be applied. The NPPF supersedes the majority of National Planning Policy Guidance and Planning Policy Statements and provides overarching guidance on the UK Government's development aims.
- 3.10 While the NPPF does not contain specific guidance on equalities, it does emphasise the importance of sustainable development and the need to support a healthy and just society. This is reflected in the key dimensions of sustainable development which relate to the economic, social and environmental roles of the planning system:
- The economic role contributes to building *“a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure”*;
 - The social role supports strong, vibrant and healthy communities by *“ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being”*; and
 - The environmental role contributes to protecting and enhancing the *“natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change including moving to a low carbon economy”*.
- 3.11 The NPPF identifies a range of planning policies that local planning authorities should consider when carrying out its function. Those of relevance to the Local Plan, include, but are not limited to:

⁶ Public Health England (2020). Health Impact Assessment in spatial planning. Available at: [Health Impact Assessment in spatial planning - GOV.UK](#)

⁷ Department for Communities and Local Government (2024). National Planning Policy Framework. Available at: [National Planning Policy Framework](#)

- **Delivering a sufficient supply of homes:** significantly boost the supply of homes by ensuring local plans proactively meet identified housing needs, including affordable and specialist housing, through a mix of deliverable and developable sites. NPPF also promotes the efficient use of land, prioritising brownfield development and supporting diverse housing options to meet the needs of all community groups.
- **Building a strong, competitive economy:** supporting sustainable economic growth by creating the conditions for businesses to invest, expand, and adapt, particularly in areas with potential for regeneration and innovation. NPPF encourages planning policies that are responsive to local business needs, promote infrastructure development, and foster a diverse and resilient economy across both urban and rural areas.
- **Ensuring the vitality of town centres:** support the long-term vitality and viability of town centres by promoting their adaptation and diversification in response to changing economic and social trends. It encourages planning policies that prioritise town centre uses, support mixed-use developments, and enhance accessibility, attractiveness, and resilience to ensure these areas remain vibrant community hubs.
- **Promoting health and safety communities:** nurture inclusive communities by encouraging mixed-use developments and vibrant public spaces that foster social interaction, ensure access to essential facilities, and provide high-quality open spaces for recreation and wellbeing
- **Promoting sustainable transport:** promote sustainable transport by encouraging development that reduces the need to travel, supports active travel and public transport, and integrates transport and land use planning. NPPF encourages planning policies that prioritise pedestrian and cycle movements, improve accessibility for all, and ensure transport infrastructure supports sustainable growth.

Regional and Local Policy

Kent County Council – Framing Kent’s Future (2022-2026)⁸

3.12 The Framing Kent’s Future Strategy sets out Kent County Council’s vision and priorities for addressing social, economic, and environmental challenges. It acknowledges the need to address long-standing disparities, especially in coastal and rural areas, and commits to ensuring that growth is matched with appropriate infrastructure and council actions are aligned with the evolving needs of its diverse communities.

3.13 The Strategy aims to build a resilient, inclusive, and forward-looking Kent by focusing on four strategic priorities:

- **Levelling Up Kent:** focus on reducing inequalities and improving outcomes across the county by harnessing the momentum of the national Levelling Up agenda. The Council aims to narrow the gaps in health, education, employment, and economic opportunity between different areas of Kent.
- **Infrastructure for Communities:** ensuring that Kent’s growing and diverse communities have access to the physical and social infrastructure needed for a

⁸ Kent County Council (2022). Framing Kent’s Future: Our Council Strategy 2022-2026. Available at: [Framing Kent's Future - Our Council Strategy 2022-2026](#)

good quality of life. This includes adopting an “Infrastructure First” approach to new development, meaning infrastructure planning and delivery must be embedded from the outset.

- **Environmental Step Change:** commitment to accelerating its environmental ambitions in response to the climate emergency and ecological pressures. The Council aims to lead by example in reducing carbon emissions, enhancing biodiversity, and building climate resilience across the county. This priority builds on existing work and sets a clear direction toward achieving Net Zero by 2050.
- **New Models of Care and Support:** address the urgent need to transform how health and social care services are designed and delivered across Kent with rising demand, an ageing population, and increasing complexity of care needs. The Council aims to move away from traditional service models toward more integrated, person-centred, and sustainable approaches.

Kent County Council – Kent and Medway Housing Strategy (2025-2030)⁹

3.14 The Housing Strategy focuses on the provision of safe, high-quality, energy-efficient and affordable home that support the wellbeing of residents across Kent and Medway. The Strategy emphasises the important of a collaborative approach that brings together various local authorities, housing associations and stakeholders to tackle housing challenges. The Strategy aims to meet growing demand through new developments, regeneration, and better use of existing stock, while also increasing the supply of affordable housing, improving housing standards, supporting independent living, and making sure residents have a voice in housing decisions.

3.15 The Housing Strategy outlines the delivery of sustainable housing solutions through the following five themes:

- **Accelerating Delivery:** accelerate the delivery of new homes across Kent and Medway by removing barriers to development, supporting innovation in construction, and promoting collaboration between councils, developers, and housing providers to meet growing demand efficiently and sustainably.
- **Infrastructure First:** aligning housing development with infrastructure improvements to make sure that new homes and populations are supported by adequate services and facilities.
- **Affordability and choice:** increasing the availability of affordable homes to make sure that all residents have access to safe and high-quality housing and addressing homelessness and poor housing conditions.
- **Safe and Efficient Homes:** make sure all homes are safe, energy-efficient, and resilient to climate risks by improving housing standards, tackling fuel poverty, reducing overheating, and simplifying access to funding for energy and water efficiency upgrades across the private sector.
- **Health and Wellbeing:** recognising the link between housing and health, the Strategy seeks to create homes that contribute to a healthier living environment and support the physical and mental wellbeing of residents.

⁹ Kent Housing Group (2025). Kent and Medway Housing Strategy 2025-2030 – Better Homes: Growth, Wellbeing and Choice. Available at: [Kent-and-Medway-Housing-Strategy-2025-web.pdf](#)

Tonbridge and Malling Borough Council – Corporate Strategy (2023- 2027)¹⁰

- 3.16 TMBC’s Corporate Strategy 2023-2027 establishes the Council’s vision ‘to be an innovative and forward-thinking council, that leads the people and businesses of the borough towards a vibrant, prosperous and sustainable future’. The Strategy is built around three core values: innovation, transformation, and delivery.
- 3.17 The Council’s priorities as set out in the Strategy are efficient services for all our residents, maintaining an effective council; sustaining a borough which cares for the environment; improving housing options for local people whilst protecting our outdoor areas of importance, and; investing in our local economy to help support residents and businesses and foster sustainable growth.
- 3.18 The Corporate Strategy is supported by other key strategies set by Tonbridge and Malling Borough Council and include:
- **Climate Change Strategy:** sets out an aspiration for the borough council to be carbon neutral by 2030, with an action plan that illustrates key steps required to contribute towards this goal;
 - **Community Safety Partnership Strategy:** creating a safer Tonbridge and Malling;
 - **Digital Strategy:** aims to allow the communities and businesses we serve to be able to engage and transact with us responsively and seamlessly;
 - **Economic Recovery Strategy:** aims to help create a dynamic and inclusive economy that fosters sustainable growth;
 - **Housing Strategy:** improving housing supply and options for the community;
 - **Local Plan:** will guide development across the borough through to 2040 and will include policies on great design, delivering the services communities need, affordable housing and regenerating Tonbridge Town Centre; and
 - **Savings and Transformation Strategy:** aims to bridge the funding gap identified in the Medium-Term Financial Strategy through savings and transformation.

Tonbridge and Malling Borough Council –Equality Policy Statement and Objectives (2022-2026)¹¹

- 3.19 Tonbridge and Malling Borough Council’s Equality Policy Statement aims to reduce inequality and promote inclusion by making sure services meet the needs of disadvantaged groups and people have the opportunity to reach their potential. The Council commits to eliminating discrimination, advancing equality of opportunity, and fostering good relations through its roles as a community leader, service provider, and employer.
- 3.20 The Statement sets out the Council’s four key equality objectives as follows:
- **Training:** Provide equality and diversity training to all staff and Councillors to eliminate discrimination and strengthen inclusive practices.

¹⁰ Tonbridge and Malling Borough Council (2023), ‘Corporate Strategy 2023 to 2027’, Available at <https://www.tmbc.gov.uk/council/corporate-strategy-2023-2027> (Last accessed 02/09/2025)

¹¹ Tonbridge and Malling Borough Council (2022-2026). Draft Equality Policy Statement and Objectives. Available at: [Equality policy statement and objectives – Tonbridge and Malling Borough Council](#)

- **Equality of Opportunity:** Improve access to health, wellbeing, employment, digital inclusion, and education in areas of deprivation.
- **Employment:** Encourage diverse recruitment and monitor the gender pay gap, with a focus on supporting disabled applicants.
- **Housing:** Enhance understanding of temporary housing needs and gather feedback to ensure services meet the needs of people with protected characteristics.

Tonbridge and Malling Borough Council – Interim Infrastructure Delivery Plan (2025)

3.21 The Infrastructure Delivery Plan (IDP) specifically identifies the infrastructure which is necessary to support the development proposed within the Council's Local Plan. The IDP provides information on existing capacity or deficit in demand for services, details of existing committed infrastructure delivery, and the impact of proposed new development on services and infrastructure.

3.22 The Plan considers the existing provision, proposed provision and additional requirements for a range of infrastructure relating to transport, education, healthcare, social infrastructure, public services, biodiversity and flood infrastructure and utility services. Those of relevance to the Local Plan, include, but are not limited to:

- **Education:** the Plan identified the need for sufficient education provision to support future growth, including new and expanded primary and secondary schools in areas of housing development. It also considers the need for further and higher education, adult learning, and early years facilities.
- **Healthcare:** the Plan includes a commitment to improving access to health services, such as GP provision and wellbeing support, particularly in areas of deprivation, as part of its broader aim to reduce inequality and promote inclusion across the borough.
- **Transport:** to support sustainable growth, improvements to transport infrastructure across road, rail, cycling, and walking networks are identified. Planned projects include upgrades to key junctions, new relief roads, and enhancements to footways and cycle links. Rail improvements focus on better access and interchange facilities at local stations.
- **Social infrastructure:** the Plan recognises the importance of social infrastructure including sports and recreation facilities, open spaces, and libraries, in supporting healthy, inclusive, and sustainable communities. Planned improvements aim to address gaps in provision, particularly in areas of new housing growth, and ensure that facilities are accessible, modern, and meet the needs of a growing and diverse population.

4. Evidence base

Introduction

4.1 This section outlines the evidence base relevant to the Local Plan. Firstly, an equalities overview is presented in Table 4-1, providing a comparison of Tonbridge and Malling's protected characteristic population against national levels. This is followed by a health

profile which explores Tonbridge and Malling’s residents physical and mental health needs.

- 4.2 A key issues and evidence section is also included, exploring evidence from available documentation, including the Regulation 18 Local Plan, Strategic Housing Market Assessment (SHMA) 2025, and Gypsy and Traveller Accommodation Assessment (2025), as well as the evidence gathered in the baseline to highlight key issues related to the Local Plan in the context of the EqIA and HIA.

Equalities baseline

- 4.3 Table 4-1 highlights key information relating to the population and protected characteristic groups in Tonbridge and Malling, compared to national levels.

Table 4-1: Baseline equalities summary

Characteristic	Summary
Population	The population of Tonbridge and Malling is 132,000 – a 9.4% increase since 2011. In comparison, the population of Kent increased by 7.7%, the South East increased by 7.5%, and England by 6.6%.
Age	Tonbridge and Malling has a slightly higher proportion of residents who are children or young people (20.2%) in 2021 compared to England (18.5%), but a slightly lower proportion of over 65-year-olds - 19.1% compared to 20.7%.
Sex	Tonbridge and Malling has a slightly higher proportion of female residents (51.3%) in 2021 compared to England (51.0%), and correspondingly 48.7% males compared to the national level 49.0%.
Disability	Tonbridge and Malling has a lower proportion of residents who identified as being disabled - whose day-to-day activities are ‘limited a lot’ - (5.9%) compared to the national figures for England (7.3%). Tonbridge and Malling also has a lower proportion of residents who identified as being disabled and whose day-to-day activities are ‘limited a little’ – 9.5% compared to 10.0%.
Race	Asian, Asian British, or Asian Welsh residents comprise the largest ethnic minority group in Tonbridge and Malling making up 2.9% of the population. This is comparatively lower than the proportion of Asian, Asian British, or Asian Welsh residents at the national level where they make up 9.6% of the population. The White ethnic group comprises the greatest proportion of Tonbridge and Malling’s population at 93.3% of residents. This is significantly higher than both the South East, 86.3%, and England, 81.0%. There are 462 residents in Tonbridge and Malling who are part of the Gypsy and Irish Traveller ethnic group. This is slightly higher than the proportions in the South East, 0.2%, and England, 0.1%.
Religion	In 2021, 48.7% of Tonbridge and Malling’s residents stated they are Christian, compared to the national level of 46.7% for England. The largest minority religious group, is Muslim at 1.0% compared to 6.5% for England as a whole.

Characteristic	Summary
Gender reassignment	Tonbridge and Malling has a higher proportion of residents who identify with the same sex as registered at birth, 95.2%, compared to the national level, 93.5%. All other gender identity groups comprise 0.1% or less of the borough's population.
Pregnancy and maternity	Tonbridge and Malling has a higher proportion of single-family households comprising a couple who are married or in a civil partnership and have dependent children (18.5%) compared to the national level (14.4%). The borough also has a higher proportion of cohabiting couples with dependent children (5.2%) compared to the national level (4.5%).
Sexual orientation	Tonbridge and Malling has a higher proportion of straight or heterosexual residents (91.8%) compared to the national level (89.4%). Gay or lesbian (0.9%) and bisexual (0.9%) comprise the most significant non-straight groups in the Tonbridge and Malling population.
Marriage and civil partnership	Tonbridge and Malling has a significantly higher proportion of residents who are married or in a registered civil partnership (50.7%) compared to the overall English figure (44.7%).

Source: Census 2021¹²

Health baseline

4.4 Table 4-2 outlines key data on the existing health and wellbeing status of the Tonbridge and Malling population, in comparison with national averages.

Table 4-2: Baseline health summary

Characteristic	Summary
General health	Tonbridge and Malling is healthier compared to national averages. According to the 2021 Census ¹³ , self-reported health in Tonbridge and Malling was at a higher level compared to the rest of England. In the Borough, 50.7% of residents described their health as 'very good' compared to 47.5% in England, and 35.1% reported their health as 'good' compared to 34.2% in England. Correspondingly, Tonbridge and Malling had lower proportions of residents reporting their health as fair, bad, or very bad compared to national levels.

¹² ONS (2023) How life has changed in Tonbridge and Malling: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000115/>; ONS (2023) Census 2021. TS008; ONS (2023) Census 2021. TS070; ONS (2023) Census 2021. TS003; ONS (2023) Census 2021. TS079; ONS (2023) Census 2021. TS002. Available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?theme=93&subgrp=Topic+Summaries>

¹³ ONS (2023) How life has changed in Tonbridge and Malling: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000115/>; ONS (2023) Census 2021. TS008; ONS (2023) Census 2021. TS070; ONS (2023) Census 2021. TS003; ONS (2023) Census 2021. TS079; ONS (2023) Census 2021. TS002. Available at: <https://www.nomisweb.co.uk/query/select/getdatasetbytheme.asp?theme=93&subgrp=Topic+Summaries>

Characteristic	Summary
Personal wellbeing	According to ONS personal well-being estimates for 2021-22 ¹⁴ , a slightly higher proportion of Tonbridge and Malling residents rated their personal wellbeing as 'poor' across three domains – happiness (9.07%), life satisfaction (5.63%), and feeling worthwhile (7.87%) – compared to England (8.41%, 4.98%, and 3.96% respectively). Only anxiety rated lower than nationally, however the share was still high, with 21.38% of residents assessing their anxiety wellbeing as poor compared to 22.55% nationally.
Life expectancy	In 2023, the life expectancy in Tonbridge and Malling is higher for males (81.1) and females (84.5) in Tonbridge and Malling compared to England (79.3 for males and 83.2 for females) ¹⁵ . However, in the most deprived parts of the borough, life expectancy is 6.9 years lower for men and 6.0 years lower for women ¹⁶ .
Child health	There is a notably lower prevalence of childhood obesity in Tonbridge and Malling (16.5%) compared to England (22.1%) ¹⁷ , and a lower proportion of children in relative low-income families (12.5% to 22.1% nationally).
Mental health	According to Tonbridge and Malling's superseded Housing Needs Survey from 2022 ¹⁸ , which draws on 2018-based ONS projections, 14,637 of 18–64-year-olds experience a common mental disorder with this figure expected to increase by 7.7% between 2020-2036.
Ageing and health	According to Tonbridge and Malling's latest Strategic Housing Market Assessment (SHMA) from 2025 ¹⁹ , 4,281 residents ages over 65 experience mobility issues which is expected to increase by 45.2% by 2042.
Deprivation	The Government's English Index of Multiple Deprivation (IMD) ²⁰ provides an overall deprivation score for each Lower Super Output Area (LSOA) and Local Authority in England. The overall score is based on a number of domains and sub-domains which together provide a measure of deprivation. Each area is ranked according to its score, and the index provides a measure of relative deprivation across all areas. Based on the 2019 IMD, Tonbridge and Malling is ranked as the 236th most deprived local authority of 317 districts in England (where 1 is the most deprived). Of the 72 LSOAs in Tonbridge and Malling, none are ranked within the 10% most deprived LSOAs nationally.

¹⁴ ONS (2022) Personal well-being estimates by local authority. Available at: <https://www.ons.gov.uk/datasets/wellbeing-local-authority/editions/time-series/versions/3>. Personal well-being estimates for 2022-23 was not a complete dataset for Tonbridge and Malling.

¹⁵ Department of Health & Social Care (2023). Local Authority health profiles: life expectancy and cause of death. Available at: [Local Authority Health Profiles - Data | Fingertips | Department of Health and Social Care](#)

¹⁶ Department of Health & Social Care (2023). Local Authority health profiles: Inequality in life expectancy [Local Authority Health Profiles - Data | Fingertips | Department of Health and Social Care](#)

¹⁷ Department of Health & Social Care (2023). Local Authority health profiles: wider health determinants. Available at: [Local Authority Health Profiles - Data | Fingertips | Department of Health and Social Care](#)

¹⁸ Tonbridge and Malling Borough Council (2022) Housing Needs Survey 2022. Available at: <https://www.tmbc.gov.uk/downloads/file/2187/housing-needs-report-2022>

¹⁹ Icenl (2025) Tonbridge and Malling Strategic Housing Market Assessment (SHMA).

²⁰ MHCLG (2019) English indices of deprivation 2019

Characteristic	Summary
Health deprivation	The IMD's health deprivation and disability domain measures " <i>the risk of premature death and the impairment of quality of life through poor physical or mental health</i> ". On this domain, Tonbridge and Malling has no LSOAs falling within the 10% or 20% most deprived LSOAs nationally

Key evidence and issues

4.5 Using available documentation, including the Regulation 18 Local Plan, the SHMA, and the Gypsy and Traveller Accommodation Assessment, as well as the evidence gathered in the baseline, this section outlines key evidence and issues in relation to the Local Plan and in the context of the EqIA and HIA.

Housing

4.6 The latest Strategic Housing Market Assessment (SHMA) was published in October 2025²¹. The key findings are outlined as follows:

- The SHMA sets a figure of 1,097 new dwellings required per annum for Tonbridge and Malling to 2042. This is based on the Local Plan housing need requirement of 19,746 dwellings.
- The analysis highlights a significant need for housing across various tenures and dwelling sizes, underpinned by an aging population, worsening affordability, and a requirement to boost housing supply.
- Housing delivery since 2015/16 has averaged 242 dwellings annually, but this rate has increased significantly to 483 since 2021/22.
- The older person population is projected to increase notably, with a 38% rise in those aged 65+ by 2042. This will also lead to an increase in people with disabilities, including a 51% rise in dementia and a 45% rise in mobility problems among those aged 65+. There is a need for around 950 additional housing units with support (sheltered/retirement housing) and around 220 additional housing units with care, primarily in the market sector. Additional nursing and residential care bedspaces (around 720) are also needed.
- Kent County Council (KCC) aims to provide around 10 new residential homes for children with complex needs across the County, seeking to work closely with local authorities like Tonbridge and Malling to identify suitable sites.

4.7 The latest Gypsy and Traveller and Travelling Showperson Accommodation Assessment was published in October 2025²². The Assessment highlights that there are 83 Gypsy and Traveller pitches across 19 sites in Tonbridge and Malling. These 19 sites are made up of 2 council sites (40 pitches), 9 private authorised sites (26 pitches), 2 private authorised sites (3 pitches) and 6 unauthorised sites (14 pitches). There are also 2 Travelling Showpersons Yards.

4.8 For the period 2025/26 to 2041/42, there is a need for 33 additional Gypsy and Traveller pitches across Tonbridge and Malling borough. Of this need, 12 pitches are needed in the first five years and 21 over the longer-term period 2030/31 to 2041/41.

²¹ Icenl (2025) Tonbridge and Malling Strategic Housing Market Assessment (SHMA).

²² Arc4 (2025) Gypsy and Traveller and Travelling Showperson Accommodation Assessment 2025: Tonbridge and Malling Borough Council.

- 4.9 TMBC launched a further Call for Sites exercise in June 2023 to identify land suitable for Gypsy, Traveller, and Travelling Showpersons use to help meet the needs of these communities in the development of the Local Plan. TMBC are progressing the assessment of sites submitted as part of the call for sites process, and plan to publish an up-to-date Interim Land Availability Assessment (LAA) alongside the Regulation 18 consultation in late-2025.

Transport

- 4.10 The Regulation 18 Stage 2 Local Plan identifies that, “New development across the borough will add pressure onto existing transport networks, this will require suitable mitigation to ensure that development does not have unacceptable highways impacts.”²³
- 4.11 The policy approach for transport is now vision led as the Local Plan recognises that new highways capacity is not the only solution, and there is need to respond to the climate crisis by aiming for carbon neutrality and by providing better transport mode choice. Decarbonising transport can be achieved by reducing the need to travel and prioritising sustainable transport, including better integrated and accessible active travel options.
- 4.12 The current high level of car ownership and related trips, and gaps in sustainable transport infrastructure with poor connectivity particularly within Tonbridge and other district centres, are key challenges that the Local Plan is seeking to address.
- 4.13 **Highways** – Within the borough there are various strategic roads, including the M20, A21, M2 and M26 which are managed by National Highways. As well as local roads including A20, A25, A26, A28 and A229 which are managed by Kent County Council.
- 4.14 Transport modelling work prepared to inform the Local Plan Reg 18 Stage 2 has included detailed junction modelling. This outlines that of the 27 junctions assessed, 11 have been identified as requiring mitigation to accommodate the forecast traffic demand. Mitigation proposals have already been developed for three of these locations: the A20/Station Road/New Road junction, M2 Junction 3/Taddington Roundabout, and Lord Lees Roundabout. These proposals will be subject to detailed testing and refinement at the next stage of the assessment to inform the Regulation 19 Local Plan.
- 4.15 For the remaining 8 junctions below, mitigation strategies have not yet been developed and will need to be confirmed as part of the next phase of work for Regulation 19, to address the specific operational challenges identified in the modelling.
- A20 / A227 / Bull Lane - Wrotham
 - A20 / A25 Maidstone Road – Wrotham Heath
 - A25 / Quarry Hill Road / High Street – Borough Green
 - A20 / Winterfield Lane / Lunsford Lane - Leybourne
 - Rochester Road / Forstal Road / High Street - Aylesford
 - A26 / Red Hill / Bow Road – Wateringbury
 - A26 Hadlow Road / Cannon Lane - Tonbridge
 - A26 Vale Road / A26 Woodgate Way - Tonbridge

²³ Tonbridge and Malling Borough Council (2025). Regulation 18 Local Plan 2024-2042: Consultation Draft, Chapter 13. Available at: [Regulation 18 Local Plan 2025 – Tonbridge and Malling Borough Council](#)

- 4.16 Further detail about these junctions can be found in the Interim Infrastructure Delivery Plan and junction modelling report.²⁴
- 4.17 **Public Transport** – Public transport in Tonbridge and Malling was only used by 4.6% of its commuters, according to the 2021 Census; a decrease from 14% of all commuters in the 2011 Census.²⁵
- 4.18 Most bus journeys in the borough operate on an entirely commercial (i.e. unsubsidised) basis, some services, infrastructure and financial support for bus users is heavily funded through KCC and Government. KCC funds ‘socially necessary’ services, particularly in rural areas. There remains concern over the viability of some bus services as patronage has not returned to pre-pandemic levels.²⁶
- 4.19 The Kent Bus Service Improvement Plan (BSIP) seeks to deliver investment and improvements in the bus network. The Council’s recognises that further evidence is required to identify bus network improvements to inform the Regulation 19 Local Plan.
- 4.20 Tonbridge and Malling has 10 stations including.
- Mainline via Tonbridge – Hildenborough and Tonbridge.
 - Mainline via Maidstone East - Barming, East Malling, West Malling (for Kings Hill) and Borough Green and Wrotham.
 - Medway Valley Line – Aylesford, New Hythe, Snodland and Wateringbury.
- 4.21 Tonbridge is a rail hub between mainline and Medway Valley routes, providing frequent services into London via Sevenoaks and Red Hill, the Kent and Sussex coast as well as Maidstone and Strood.
- 4.22 There will be a cumulative impact of development on stations at Tonbridge, Hildenborough, Snodland, Aylesford, Barming, West Malling, Borough Green and Wrotham, arising from the proposed development allocations in the Local Plan and other developments that may come forward. The arising growth in passenger demand and patronage will require station improvements as outlined in the Council’s Interim Infrastructure Delivery Plan²⁷.
- 4.23 **Active Travel** - TMBC has prepared a draft Active Travel Strategy 2025²⁸, released for consultation alongside the Regulation 18 stage 2 Local Plan. This sets out the priorities for encouraging active travel in the borough. The Strategy’s objectives are to.
- Make active travel the natural choice for local and multi-modal journeys.
 - Reduce the impacts of climate change.
 - Integrate active travel into planning.
 - Improve health through increased physical activity.
 - Increase economic activity in urban centres.
 - Reduce social inequality.
- 4.24 To achieve these objectives the Strategy seeks to provide residents and those who work in the borough with better routes, particularly for cycling and wheeling. The Regulation 18 Local Plan seeks to allocate development in sustainable locations which should reduce the need to travel long distances for key services. The route

²⁴ Jacobs (2025) Tonbridge and Malling Junction Modelling Report. Available at: [Tonbridge and Malling Junction Modelling Report](#)

²⁵ ONS (2021) 2021 Census, TS061. Available at [Nomis - 2021 Census Area Profile - Tonbridge and Malling Local Authority](#);

²⁶ Kent County Council (2024) Bus Service Improvement Plan. Available at: [Bus Service Improvement Plan - Kent County Council](#);

²⁷ Tonbridge and Malling (2025) Interim Infrastructure Delivery Plan. Available at: [Interim Infrastructure Delivery Plan](#);

²⁸ Tonbridge and Malling (2025) Active Travel Strategy. Available at: [Active Travel Strategy](#);

improvements identified in the Strategy will help to ensure that travel between places can be achieved using sustainable modes.

Environment

- 4.25 Tonbridge and Malling is predominantly agricultural in character with large areas of land outside the urban settlements in agricultural use. The Regulation 18 Local Plan outlines that the Local Plan should seek to avoid allocating development sites that would result in significant reduction in high-quality agricultural land.²⁹ Furthermore, 29.8% of the borough is covered by two Areas of Outstanding Natural Beauty (AONBs), and therefore the sensitive location and design of development is paramount to avoid or mitigate any impacts on the AONBs and their settings.
- 4.26 The Regulation 18 Local Plan also outlines the importance of considering the likely effects of new developments on health, living conditions and the natural environment, including air, light and noise pollution.³⁰ The main source of air pollution in the Borough comes in the form of nitrogen dioxide and is generated from road traffic, with six air quality management areas in the Borough being due to transport-borne nitrogen emissions. Consequently, the Regulation 18 Local Plan outlines that new developments should seek to avoid being located near areas of poor air quality.
- 4.27 Further, supporting development at locations close to services and jobs where there are opportunities for sustainable active travel including cycling and walking could help to achieve carbon emissions reductions. At the local level this can include policies that support low carbon design through the layout, building orientation, massing and landscaping.
- 4.28 Provision of open space in the Borough, changes in recent years, and options for the Local Plan are set out in the Open Space Study (2025).³¹ The study highlighted how there was an increase of 183 hectares of green space since 2009 due to new provisions such as Kings Hill. Natural greenspace had the highest increase of 153.73 hectares compared to parks and gardens (16.63 ha increase) and children and young people's play (9.71 ha increase). Increased provision of open spaces, in particular high quality outdoor sports facilities, equipped children play areas and country parks are important in improving health and wellbeing of communities.

Employment

- 4.29 The employment rate for 16-64-year-olds in Tonbridge and Malling has increased from 76.8% to 86.3% between the 2021 Census and the Office for National Statistics (ONS) Annual Population Survey in 2023.³² The employment rate in 2023 is higher than that for the southeast (79.3%) and nationally (76.0%).
- 4.30 The largest single occupation type in Tonbridge and Malling is Caring Personal Service Occupations (14.3%), followed Corporate Managers and Directors (13.7%) and Business & Public Service Associated Professionals (13.2%).³³ In terms of job growth,

²⁹ Tonbridge and Malling Borough Council (2025). Regulation 18 Local Plan 2024-2042: Consultation Draft. Available at: [Regulation 18 Local Plan 2025 – Tonbridge and Malling Borough Council](#)

³⁰ Tonbridge and Malling Borough Council (2025). Regulation 18 Local Plan 2024-2042: Consultation Draft. Available at: [Regulation 18 Local Plan 2025 – Tonbridge and Malling Borough Council](#)

³¹ Ploszajski Lynch Consulting Ltd. (2025) Tonbridge and Malling Borough Council Open Space Study. Available at [tonbridge-and-malling-open-space-study](#)

³² ONS (2023) Annual Population Survey. Available at [Local indicators for Tonbridge and Malling \(E07000115\) - ONS](#)

³³ ONS (2023) Annual Population Survey. Available at [Tonbridge and Malling Economy | Labour Market & Industries](#)

between 2011 and 2021, Tonbridge and Malling experienced a higher rate of growth at 10.2% compared to the southeast, 9.2%, and national levels, 9.5%.³⁴

- 4.31 In line with Kent, the South East and the UK, businesses in Tonbridge and Malling are predominately micro businesses (0-9 staff), increasing from 87.9% in 2011 to 89% in 2021.³⁵ The share of self-employed workers also increased from 11.4% in 2011 to 16.3% in 2021, exceeding the proportion recorded more widely across Kent, the South East, and the UK.
- 4.32 The Borough has seen structural changes to its employment sectors and employment space in recent years; the wholesale and logistics industry has grown whilst the manufacturing industry has declined, and correspondingly industrial employment space has decreased by 20% between 2010/11-2021/22.³⁶ The Borough also has a strong land based and rural economy, with well-established and diversifying agricultural businesses, including recent growth in viticulture businesses which produce sparkling wine and gin.

Community facilities

- 4.33 The Council recognises the significant risks associated with failure to adequately plan for infrastructure to support communities. In identifying potential risks, the Council has developed an Infrastructure Delivery Plan (IDP) to understand the existing capacity or demand for services, to understand details of existing committed infrastructure delivery, and the impact of potential development on services and infrastructure.³⁷ The Regulation 18 Local Plan recognises that increasing populations, particularly in and around residential town centres, increases the need for additional community facilities.³⁸

³⁴ Lichfields (2022) Tonbridge & Malling Economic Development Needs Study. Part One. Available at:

<https://www.tmbc.gov.uk/downloads/file/2204/economic-development-needs-study>

³⁵ Lichfields (2022) Tonbridge & Malling Economic Development Needs Study. Part One. Available at:

<https://www.tmbc.gov.uk/downloads/file/2204/economic-development-needs-study>

³⁶ Tonbridge and Malling Borough Council (2022). Tonbridge and Malling Economic Development Needs Study. Available at: [Economic Development Needs Study part 1](#)

³⁷ Tonbridge and Malling (2025) Interim Infrastructure Delivery Plan. Available at: [Interim Infrastructure Delivery Plan](#)

³⁸ Tonbridge and Malling Borough Council (2022). Regulation 18 Local Plan: Consultation Document. Available at: [Regulation 18 Local Plan 2022 – Tonbridge and Malling Borough Council](#)

5. Assessment of impacts

Introduction

- 5.1 This section presents an assessment of potential equality and health (adverse and beneficial) impacts associated with the scoped-in policies across the nine themes within the Local Plan.
- 5.2 The assessment of impacts is structured thematically. Each section begins by identifying the policies under each theme of the Local Plan and indicating which policies have been scoped in and out of the assessment through the scoping exercise outlined in **Section 2.3**.
- 5.3 **Section 5.2** includes the borough's spatial strategy policies. As these are overarching policies, the impacts of each have been assessed within other specific thematic policy areas in **Section 5.3 – 5.10**. For example, SP6 (Town Centre Needs) will be assessed from an HIA and EqIA perspective under **Section 5.8** (Economy and Town centre policies). There is an exception with SP7 (Green Belt) and SP8 (Managing development in the Green Belt) which require their own assessment of impacts, as their specific impacts are not covered within other thematic policy areas. The EqIA and HIA for these two policies can be seen in **Section 5.2.1** and **Section 5.2.2**.
- 5.4 The assessment is informed by the baseline profiles and key issues and evidence relevant to Tonbridge and Malling outlined in **Chapter 4**. Where applicable, the assessment aligns with the objectives set out in the assessment framework (see Table 2-1). In certain instances, the analysis may extend beyond the framework where policies introduce new or additional considerations relevant to equality and health.

Spatial Strategy policies

- 5.5 As mentioned under **Section 5.1**, the spatial strategy policies are overarching spatial policies and align with other thematic areas covered in **Section 5.3 – 5.10**. To avoid duplication, the below table displays where the assessment of impacts for these policies are addressed with the exception of SP7 and SP8, which are assessed individually under Section 5.2.1 and 5.2.2, as their specific impacts are not covered within other thematic policy areas.

Spatial strategy policy	Thematic area/policy addressed
SP1: Spatial Strategy	The potential impacts for growth, town centres, employment, and maintaining and enhancing a sustainable and attractive borough are assessed under: Infrastructure policies (INF1-INF5), Housing policies (H1-H10), Economy and Town Centres policies (E1-E8), Climate Change policies (CC1-CC8) and Natural Environment (NE1-NE12)
SP2: Delivering homes for our communities	The potential impacts of Tonbridge and Malling's delivering against the minimum housing requirement is addressed under: Housing policies (H1-H10)
SP3: Settlement Hierarchy and general development principles	The potential impacts from Tonbridge and Malling's settlement hierarchy and general development principles are assessed under: Housing policies (H1-H10) and Infrastructure policies (INF1-INF5)

Spatial strategy policy	Thematic area/policy addressed
SP4: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs	The potential impacts of Tonbridge and Malling delivering against the identified Gypsies, Traveller and Travelling Showpeople accommodation needs are assessed under: Housing policies (H4-H5)
SP5: Future Employment Growth	The potential impacts of Tonbridge and Malling’s allocation of employment development sites are assessed under: Economy and Town Centres policies (E1-E4)
SP6: Town Centre Needs	The potential impacts of Tonbridge and Malling meeting the identified retail floorspace needs in town centres is assessed under: Economy and Town Centres policies (E1-E8)
SP7: Green Belt	The potential impacts of SP8 have been assessed in Section 5.2.1 and 5.2.2 below.
SP8: Managing development in the Green Belt	The potential impacts of SP9 have been assessed in Section 5.2.1 and 5.2.2 below.
SP9: Local Green Gap	The potential impacts of Tonbridge and Malling’s strategy to conserve local Green Gaps between settlements is assessed under: Rural Policies (R1-R10) and Natural Environment (NE1-NE12)

Equality Impact Assessment

- 5.6 Policy SP7 relating to managing development within the green belt states development can only be permitted where there is appropriate parking provision and safe access. This is expected to include alignment with design standards to ensure disabled parking and accessibility needs are included for disabled and elderly people, generating positive equality impacts for these groups.
- 5.7 Policy SP8 also highlight that where housing developments are proposed in the Green Belt, at least 50% must be affordable. This is expected to have positive equality impacts for groups overrepresented in social housing waitlists and other vulnerable tenants at risk of homelessness. This may include low-income households, ethnic minority groups, and young people³⁹. Further, the inclusion of open green spaces in Green Belt developments could provide positive impacts such as improved health and wellbeing for lower income households who do not have access to private garden space⁴⁰.

³⁹ Department for Levelling Up, Housing & Communities (2024), ‘Social housing lettings in England, tenants: April 2022 to March 2023’, Available at <https://www.gov.uk/government/statistics/social-housing-lettings-in-england-april-2022-to-march-2023/social-housing-lettings-in-england-tenants-april-2022-to-march-2023> (Last accessed 04/09/2025)

⁴⁰ University of Edinburgh (2014), ‘The Contribution of Green and Open Space to Public Health and Wellbeing’, Available at <https://www.hutton.ac.uk/sites/default/files/files/projects/GreenHealth-InformationNote7-Contribution-of-green-and-open-space-in-public-health-and-wellbeing.pdf> (Last accessed 05/09/2025); and Office for National Statistics (2020), ‘One in eight British households has no garden’, Available at <https://www.ons.gov.uk/economy/environmentalaccounts/articles/oneineightbritishhouseholdshasnogarden/2020-05-14> (Last accessed 05/09/2025)

Health Impact Assessment

- 5.8 Policy SP7 supports the beneficial use of Green Belt land, including enhancing blue-green infrastructure such as woodlands, watercourses, and accessible green spaces. Under Policy SP8, harmful development within the Green Belt will be resisted, which would help safeguard natural environments that contribute to public health. By protecting green spaces, these policies would have positive physical health implications by encouraging active lifestyles. As a result, both policies would also support mental health by providing tranquil settings for walking and relaxation and reducing stress. Additionally, the continued protection of green belt would help mitigate climate-related health risks such as overheating and poor air quality.

Climate Change policies

Policy Area	Scoped in/out	
	EqlA	HIA
Policy CC1: Strategic Climate Change	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC2: Circular Economy	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC3: Sustainable Design and Construction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC4: Energy & Heating	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC5: Renewable and low carbon and heat projects	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC6: Water Efficiency	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC7: Managing development within flood risk areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy CC8: Sustainable Drainage Systems [SUDS]	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Key: - Scoped in to assessment, - Scoped out of assessment

Equality Impact Assessment

- 5.9 Mitigation measures and energy performance initiatives included in Policies CC1, CC3, and CC4 may reduce energy costs for residents. This could particularly benefit low-income households who experience energy poverty and disabled people who already have a higher cost of living⁴¹. For example, Policy CC3 outlines the use of high-performance materials in construction in order to reduce the operational energy demands of developments. This could reduce the living costs for occupants and particularly benefit low-income and disabled households who face a disproportionately high cost of living.
- 5.10 Further, reducing the amount of energy used in the construction and use of buildings, as well as mitigating carbon emissions during construction and promoting sustainable transport modes, could promote equality benefits for groups who are more vulnerable to negative health conditions caused by poor air quality. This includes pregnant women, children, elderly people and people with respiratory health conditions⁴².
- 5.11 Policy CC5 outlines that new renewable energy developments and distribution networks will be supported for schemes where the physical and visual impacts do not result in adverse impacts on the local environment that cannot be satisfactorily mitigated. This includes impacts from noise, shadow flicker, vibration and glint/glare.

⁴¹ Scope (2025), 'Disability Price Tag: The Extra Cost of Cuts', Available at <https://www.scope.org.uk/campaigns/disability-price-tag> (Last accessed 05/09/2025)

⁴² Institute for Fiscal Studies (2024), 'Exposure to air pollution in England, 2003-23', Available at <https://ifs.org.uk/sites/default/files/2024-12/Exposure-to-air-pollution-in-England-2003-23.pdf> (Last accessed 05/09/2025)

This could reduce the potential for negative environmental impacts of new energy developments for groups who spend longer periods indoors, and would be more exposed to impacts, including disabled people, elderly people, families with young children and residents with sensory impairments and health conditions⁴³.

- 5.12 All other Climate Change policies are not considered relevant to any particular protected characteristic group/s and have therefore been scoped out of the EqIA.

Health Impact Assessment

- 5.13 There is a clear link between climate change and health. The borough should prioritise policies and interventions that address both health inequalities and climate change because of the likelihood that people with the poorest health would be hit hardest by the impacts of climate change. Together, these eight climate change policies promote development that is more resilient to climate impacts while supporting healthier, safer, and more comfortable environments for future residents and communities.
- 5.14 Policy CC1 sets a comprehensive framework for climate mitigation and adaptation across all development. The policy's requirement for a proactive and best practice approach to net zero will not only reduce greenhouse gas emissions but also help deliver healthier indoor and outdoor environments. Key policy measures such as passive design for heating and cooling, natural ventilation, energy efficiency, and green infrastructure will improve thermal comfort, reduce indoor air pollution, and minimise the risk of overheating, especially during extreme heat events. This is particularly beneficial for elderly residents, young children, and those with cardiovascular or respiratory illnesses, who are most at risk from exposure to poor air quality and high indoor temperatures impacting their health.
- 5.15 The policy's focus on sustainable locations, active travel, and access to green infrastructure supports healthier lifestyles by encouraging walking, cycling, and regular physical activity. Meanwhile, the integration of tree planting and carbon sequestration offers multiple co-benefits for physical and mental health, including reduced urban heat island effect, cleaner air, and improved access to nature.
- 5.16 By encouraging a circular economy, Policy CC2 aims to support sustainable construction and the retention of existing buildings, helping to limit the environmental disruption often associated with demolition and large-scale construction. By minimising waste, reusing materials, and reducing embodied carbon, this policy helps lower harmful emissions and construction-related air pollution, which can disproportionately affect deprived and urban communities.
- 5.17 Similarly, Policy CC3 requires developers to consider whole lifecycle carbon impacts, prioritise sustainable materials, and apply the cooling hierarchy to minimise overheating and support healthy indoor climates. Designing buildings for high thermal performance and natural ventilation reduces reliance on electricity-powered systems, contributing to lower energy costs. This would support in limiting potential for residents to experience associated financial stress and the consequent potential negative impacts on their mental health.
- 5.18 Policy CC4 seeks to reduce demand, promote efficiency, and maximise renewable energy. The policy's emphasis on a fabric-first approach and the requirement for high construction standards (e.g., Home Quality Mark and BREEAM targets) helps to ensure homes are warmer, more energy-efficient, and affordable to heat, which is

⁴³ Public Health England (2018), 'Review and Update of Occupancy Factors for UK Homes', Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763306/review_and_update_of_occupancy_factors_for_uk_homes.pdf (Last accessed 04/09/2025)

especially important for low-income and vulnerable households. Living in cold, damp housing is associated with increased risks of respiratory illness, cardiovascular conditions, and mental health deterioration. By reducing these risks, the policy directly contributes to improving health equity and reducing health service demand.

- 5.19 Policy CC5 promotes the development of clean energy infrastructure where adverse impacts can be appropriately mitigated. By supporting community-led energy schemes and resilient local energy networks, particularly in conjunction with healthcare and essential services, the policy helps reduce reliance on polluting energy sources and promotes energy security. This transition helps lower air pollution levels, which are strongly linked to asthma, chronic obstructive pulmonary disease and heart disease, and therefore could improve health, particularly in urban and deprived areas.
- 5.20 Policy CC6 seeks to improve the borough's water efficiency and reduce levels of consumption, by recommending measures for new and existing developments such as incorporating rainwater harvesting and supporting greywater recycling. Access to safe and sufficient water is fundamental to public health, and these measures help safeguard future water supply and reduce pressure on existing infrastructure. The policy's focus on reducing water use would also make homes more affordable to run, supporting health equity for lower-income residents.
- 5.21 Policies CC7 and CC8 play a vital role in improving public health by ensuring development is designed to be resilient to current and future flood risks. Flooding poses a range of health risks including physical injury, displacement, increased stress, anxiety, and long-term trauma. These impacts are often most severe for already disadvantaged groups, who may have fewer resources to recover and adapt. By integrating natural flood management, Sustainable Urban Drainage Systems (SuDS), and ensuring safe development locations that do not have any adverse effects on the capacity or water quality of any watercourse or floodplain, both policies reduce exposure to these risks. SuDS systems that incorporate green infrastructure and biodiversity also provide mental health benefits, enhance local amenity, and contribute to overall wellbeing through access to natural environments.

Natural Environment policies

Policy Area	Scoped in/out	
	EqIA	HIA
Natural Environment		
Policy NE1: Conserving and enhancing the natural environment	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE2: National landscapes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE3: Landscape character	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE4: Designated sites, irreplaceable habitat and priority habitat and species	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE5: Biodiversity Net Gain	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE6: Green and blue infrastructure	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE7: Woodland, trees and hedgerows	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE8: Best and most versatile agricultural land	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE9: Noise, vibration and odour	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE10: Air quality	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE11: Ground contamination	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy NE12: Light pollution	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Key: ☑ - Scoped in to assessment, ☒ - Scoped out of assessment

Equality Impact Assessment

- 5.22 Policy NE6 states that all new green and blue infrastructure spaces should encourage healthy, inclusive and safe spaces to maximise the delivery of green infrastructure benefits. Although new green and blue spaces would positively impact all residents of the borough, ensuring these areas are inclusive and safe may particularly benefit groups of people who are more vulnerable to exclusion and harassment based on their sexual orientation, gender or history of gender reassignment⁴⁴. Green infrastructure spaces may also promote social inclusion for elderly people who are potentially more vulnerable to isolation⁴⁵.
- 5.23 Under Policy NE9, developments should minimise noise, vibration and odour pollution. This may positively benefit groups who spend more time inside at sensitive receptors such as schools, hospitals and care facilities. This could include benefits to disabled people, elderly people, children and young people, and those with long-term health conditions. Similar equality effects could be expected under Policy NE12 that considers the loss of light on the natural and built environment.
- 5.24 Development proposals should also seek to improve air quality and reduce the effects of poor air quality under Policy NE10. This may promote positive equality impacts for people who experience respiratory health conditions or those more sensitive to the effects including pregnant women, children, and elderly people⁴⁶.
- 5.25 All other Natural Environment policies are not considered relevant to any particular protected characteristic group/s and have therefore been scoped out of the EqIA.

Health Impact Assessment

- 5.26 The proposed natural environment policies promote healthier places by protecting biodiversity, safeguarding landscapes, minimising pollution, and expanding access to green and blue infrastructure. Together, these policies create conditions that support improved physical and mental health, reduce environmental risks, and enhance resilience to climate change.
- 5.27 Policies NE1, NE2 and NE3 seek to protect and enhance the borough's biodiversity, ecological networks, landscape character and nationally significant landscapes such as the Kent Downs and High Weald National Landscapes. This includes conservation of priority habitats, ancient woodland, and soil health, alongside efforts to improve landscape connectivity and character. These measures can indirectly benefit the health of residents and visitors by improving access to green spaces, encouraging physical activity, reducing stress, and supporting a sense of place and local identity.
- 5.28 Policy NE4 aims to safeguard designated biodiversity sites, irreplaceable habitats and protected species. The policy ensures the mitigation hierarchy is followed, meaning harm to the natural environment must be avoided, minimised, or compensated for. As a result, this policy helps maintain ecosystem functions, such as air purification, water filtration, and biodiversity, which are essential to long-term public health. It also

⁴⁴ More in Common (2023), *Rapid Evidence Review on Harassment and Censorship*, Available at https://assets.publishing.service.gov.uk/media/65fd7b5565ca2f001b7da8c5/Rapid_Evidence_Review_on_Harassment_and_Censorship.pdf (Last accessed 04/09/2025)

⁴⁵ Younes, S.R., Marques, B., McIntosh J. (2024), *Public Spaces for Older People: A Review of the Relationship between Public Space to Quality of Life*, Available at <https://www.mdpi.com/2071-1050/16/11/4583> (last accessed 05/09/2025)

⁴⁶ Institute for Fiscal Studies (2024), *Exposure to air pollution in England, 2003-23*, Available at <https://ifs.org.uk/sites/default/files/2024-12/Exposure-to-air-pollution-in-England-2003-23.pdf> (Last accessed 05/09/2025)

ensures opportunities for residents to connect with nature and wildlife are retained or improved.

- 5.29 A minimum 10% biodiversity net gain (BNG) is required under Policy NE5 for new developments and must be maintained for at least 30 years. Developers must submit Biodiversity Gain Plans and demonstrate alignment with local strategies such as the Local Nature Recovery Strategy. By restoring or creating habitats, BNG can contribute to cleaner air and water, natural flood protection, and carbon sequestration. This offers long-term health benefits through climate adaptation and by providing green spaces for recreation and enjoyment. Similarly, trees, woodland and hedgerows are to be protected, enhanced and, where appropriate, extended under Policy NE7. These features contribute to the quality of the public realm, visual amenity, and biodiversity, while offering shading, cooling and shelter. Incorporating trees into streets and open spaces enhances the sense of security for residents, while also improving air quality and regulating temperature.
- 5.30 Policy NE6 focusses on protecting and delivering new green and blue infrastructure. New development must avoid the loss of existing features and instead design in green spaces, tree planting, green roofs, and water features from the outset. These environments support mental and physical health by offering safe spaces for exercising, socialising and relaxation. They also help regulate temperature, improve air quality, and reduce flood risk, which would enhance wider environmental health.
- 5.31 The protection of best and most versatile (BMV) agricultural land, set out in Policy NE8, would ensure that land important for food production, soil health and ecosystem services is preserved. Healthy soils support biodiversity, reduce runoff and pollution, and could contribute to local food security. Protecting such land would help maintain environmental health and can indirectly improve long-term community wellbeing through sustainable resource use.
- 5.32 Policies NE9, NE10 and NE12 aim to reduce human exposure to environmental hazards. Development must minimise noise, vibration, odour, air pollution and light pollution with a particular focus on protecting sensitive receptors including homes, schools, healthcare settings and designated nature sites. Poor air quality is a major contributor to respiratory and cardiovascular diseases, while excessive noise can lead to stress, sleep disturbance and mental health issues. Reducing unnecessary or intrusive lighting can support better sleep, protect nocturnal biodiversity, and maintain the tranquillity of environments.
- 5.33 Where land is suspected to be contaminated, Policy NE11 requires thorough investigation and risk assessment. This ensures that sites can be safely remediated before development proceeds, reducing risks to human health from exposure to hazardous substances. By identifying sources, pathways and receptors early on, the policy helps prevent long-term harm, especially for residents living on or near previously industrial land.

Historic Environment policies

Policy Area	Scoped in/out	
	EqIA	HIA
Policy HE1: The Historic Environment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy HE2: Listed Buildings	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Policy HE3: Conservation Areas	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Policy HE4: Historic Parks and Gardens (designated and non-designated)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Policy HE5: Archaeology	<input type="checkbox"/>	<input type="checkbox"/>
Policy HE6: Enabling Development for heritage assets	<input type="checkbox"/>	<input type="checkbox"/>

Key: - Scoped in to assessment, - Scoped out of assessment

Equality Impact Assessment

- 5.34 Under policies HE1 and HE2, the protection and enhancement of historic environments, buildings and assets with religious origins (e.g. churches and historic pagan sites) could have positive equality impacts for religious groups by supporting cultural identity, heritage and inclusion.
- 5.35 All other Historic Environment policies are not considered relevant to any particular protected characteristic group/s and have therefore been scoped out of the EqIA.

Health Impact Assessment

- 5.36 Access to a well-maintained, high quality historic environment is a key contributor to health and wellbeing. Heritage assets such as historic buildings, conservation areas, parks, and landscapes support mental health by fostering a strong sense of place, identity, and cultural continuity. Policy HE1 supports development proposals which conserve and enhance the historic environment. As a result, the policy would promote enjoyment of historic environments which supports sense of place, local community identity and emotional wellbeing.
- 5.37 Policies HE3 and HE4 support the conservation and enhancement of conservation areas and historic parks and gardens respectively. Together these policies could contribute to supporting the borough's green infrastructure and overall environmental quality. By protecting trees, landscaping, and viewpoints, these policies evidently help safeguard valued open and public spaces that offer opportunities for physical activity. Access to green historic environments is especially beneficial for safeguarding or creating inclusive and tranquil neighbourhoods and improving mental wellbeing and social cohesion, which these policies will therefore support effectively.
- 5.38 All other Historic Environment policies are not considered relevant to health or the impacts have been assessed for other thematic policies and have therefore been scoped out of the HIA.

Design policies

Policy Area	Scoped in/out	
	EqIA	HIA
Policy D1: Achieving High Quality Design	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy D2: Design Codes and Masterplans	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Key: - Scoped in to assessment, - Scoped out of assessment

Equality Impact Assessment

- 5.39 The policy of achieving high quality design includes particular emphasis on creating inclusive, attractive places which promote a sense of place and pay regard to local distinctiveness and character as well as contributing to health and wellbeing. This could potentially positively impact disabled people and residents with accessibility needs, where compliance is made to relevant local and national design guides and

codes. Inclusive engagement promotes positive equality impacts by understanding the needs of local communities and key user groups, as well as compliance with minimum standards outlined in design codes.

- 5.40 Integrating convenient access to local public transport within the design, facilities, and services outlined in Policy D1 aims to prioritise inclusive transport options and stronger connections to existing networks, potentially improving access to essential services (e.g. GPs, hospitals, and community centres) for older residents and individuals with disabilities or long-term health conditions. Providing high quality pedestrian and cycle infrastructure could promote health and wellbeing impacts to older residents who are more likely to experience loneliness, isolation, and age-related health conditions⁴⁷.
- 5.41 Policy D1 also promotes designing homes with the adaptability to change/evolve needs and facilitate opportunities for homeworking. This could positively benefit disabled and older workers who are more likely to face barriers in accessing local workplaces and offices⁴⁸. This policy may eliminate commuting challenges, allows individuals to tailor their working environment to meet their needs and minimises exclusion from opportunities based on non-inclusive environments⁴⁹. Designing properties which can facilitate homeworking also enables successful hybrid working for residents with caring responsibilities who are predominantly female and female residents experiencing cyclical health conditions (i.e. endometriosis, menstrual migraines and Premenstrual Dysphoric Disorder (PMDD)) where attendance in person cannot be met every day⁵⁰.
- 5.42 Policy D2 builds on the benefits of Policy D1 by requiring a masterplan for all sites of 100 or more dwellings, with a particular emphasis on the use of Design Codes and masterplans that reflect local aspirations and are shaped by meaningful community engagement. Community engagement should seek to actively engage with protected characteristic groups to understand and respond to their equality-related needs. For example, those with disabilities or long-term health conditions may have specific access requirements and women, ethnic minorities and religious groups may have particular safety concerns in the design of inclusive places.

Health Impact Assessment

- 5.43 Well-designed, high quality, inclusive and attractive places contribute significantly to health and wellbeing. Policy D1 sets out that development proposals should incorporate the principles of good design from the outset, with careful consideration given to local character, distinctiveness, and context. Indicating that developments should provide high quality, multifunctional green and public spaces that are resilient to climate change, it is clear that the policy would support physical activity, and foster opportunities for social connection, benefiting both physical and mental health. In addition, Policy D1 specifies that all new residential developments must meet the latest Nationally Described Space Standards, which would support residents' comfort, privacy, and mental wellbeing. Whilst good design is a key determinant of positive

⁴⁷ Williams, A. J., McHale, C., Chow, C. (2021), 'Final report on loneliness and transport systematic review', Available at <https://www.sustrans.org.uk/media/11359/sustrans-loneliness-and-transport-systematic-review-final-report-21-06-30.pdf> (Last accessed 04/09/2025)

⁴⁸ National Centre for Accessible Transport (NCAT) (2024), 'Understanding and identifying barriers to accessing transport', Available at <https://www.ncat.uk/wp-content/uploads/2024/12/ncat-Understanding-and-identifying-barriers-to-accessing-transport-Full-Report-Accessible-PDF-FINAL-1.pdf> (Last accessed 04/09/2025)

⁴⁹ Work Foundation (2022), 'The changing workplace: Enabling disability-inclusive hybrid working', Available at <https://www.lancaster.ac.uk/media/lancaster-university/content-assets/documents/lums/work-foundation/TheChangingWorkplace.pdf> (Last accessed 04/09/2025)

⁵⁰ Hvala, T., Hammarberg, K. (2025), 'The impact of reproductive health needs on women's employment: a qualitative insight into managing endometriosis and work', Available at <https://bmcmwomenshealth.biomedcentral.com/articles/10.1186/s12905-025-03726-y> (Last accessed 04/09/2025)

health outcomes, it is important that this does not cause developments which provide affordable housing to be unviable.

- 5.44 Policy D1 seeks to maximise healthier lifestyles and enable safe and convenient access to local services, open spaces, and active travel infrastructure. The integration of walking, cycling and public transport connections into new development as the policy envisages would help reduce reliance on cars, encourage active travel and support access to social infrastructure such as GP surgeries, hospitals, schools and other community facilities.
- 5.45 Policy D1 also expects major applications to demonstrate early, proactive, and effective engagement with the local community on design matters. This could help ensure that local views and aspirations are embedded in the design process, which would contribute to the creation of places that support health and wellbeing.
- 5.46 In line with Policy D2, the Council will require the submission of a masterplan for all sites of 100 or more dwellings, or for significant non-residential development. For large-scale strategic sites of 500 or more dwellings, the Council will also require Design Codes in addition to a masterplan. In stating that both Design Codes and masterplans must be informed by meaningful community engagement and reflect local aspirations, it is clear that new development would be likely to deliver well-designed, high-quality places that support the health and wellbeing of residents in the long term.

Housing policies

Policy Area	Scoped in/out	
	EqIA	HIA
Policy H1: Housing to address needs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H2: Affordable housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H3: Build-to-rent	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H4: Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H6: Specialist housing to meet the needs of older and vulnerable people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H7: Accessible and adaptable homes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H8: Self and custom build housing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H9: Houses in Multiple Occupation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy H10: Residential extensions, alternations, annexes and ancillary accommodation	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Key: - Scoped in to assessment, - Scoped out of assessment

Equality Impact Assessment

- 5.47 Policy H1 could benefit all protected characteristic groups through the delivery of high quality, and well-designed homes with a mixture of tenures, types and sizes to accommodate diverse needs of the local community. This includes setting targets for the percentage of market homes, affordable home ownership and renting. The provision of affordable home ownership could particularly benefit lower-income residents and young people looking to purchase their first home, while affordable rented housing could benefit people overrepresented on social housing waitlists

including disabled people, ethnic minority groups, and female survivors of domestic abuse⁵¹.

- 5.48 Policy H1 further outlines that new housing proposals will be supported where they are accessible by local transport connections. This could benefit residents who require regular access to essential services, such as primary health care, including pregnant women, elderly and disabled people. In the case of public transport connections, this could also particularly benefit low-income residents who are less likely to have access to a private car or residents who are less likely to be able to drive, including elderly and disabled people due to reduced mobility and/or health conditions.
- 5.49 Policy H2 further details the requirements for providing affordable housing that could benefit low-income groups through 30% affordable rent and 20% intermediate accommodation, and those overrepresented on the social housing waitlist through 50% of affordable housing made available for social rent. Policy H2 also considers to need for affordable homes to be of high quality and incorporate open spaces in line with market housing. This targets a reduction in the inequalities of outcome for groups experiencing socio-economic disadvantage and other intersectional impacts, such as those more vulnerable to social exclusion and isolation including elderly people, disabled people, and ethnic minority groups⁵².
- 5.50 Another policy addressing the need for affordable housing is Policy H3. This policy outlines the expansion of Build-to-Rent schemes that provide purpose-built accommodation for groups looking to rent. These properties could help provide affordable housing to low-income households and young people who are more likely to seek rented housing⁵³. The policy also requires these properties to have good public transport connections, positively impacting residents who do not have access to a private car due to financial barriers or are unable to drive due to disabilities and/or long-term health conditions but require regular access to public essential services. This may include elderly people, disabled people, young people and low-income residents⁵⁴.
- 5.51 Build-to-Rent units provided under Policy H3 must also provide communal areas, community facilities and services as part of their development. These services could provide a sense of community for groups more likely to experience social isolation including elderly people, disabled people, and ethnic minority groups, as well as providing a space for young people to establish a local community network⁵⁵.
- 5.52 Policies H4 and H5 address safeguarding and site criteria requirements for Gypsy, Traveller and Travelling Showpeople sites. Protecting and safeguarding existing sites, as well as providing new sites for displaced residents, disproportionately benefits Romani and Irish gypsy groups. For residents from ethnic minority backgrounds, the safeguarding policy fosters positive equality outcomes and supports mental wellbeing

⁵¹ Department for Levelling Up, Housing & Communities (2024), 'Social housing lettings in England, tenants: April 2022 to March 2023', Available at <https://www.gov.uk/government/statistics/social-housing-lettings-in-england-april-2022-to-march-2023/social-housing-lettings-in-england-tenants-april-2022-to-march-2023> (Last accessed 04/09/2025)

⁵² Campaign to End Loneliness (2023), 'The State of Loneliness 2023: ONS data on loneliness in Britain', Available at <https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf> (Last accessed 04/09/2025)

⁵³ BPF (2021), 'Build-to-Rent proves affordable in largest-ever resident analysis', Available at <https://bpf.org.uk/media/press-releases/build-to-rent-proves-affordable-in-largest-ever-resident-analysis/> (Last accessed 04/09/2025)

⁵⁴ UK Government (2023), 'Ethnicity facts and figures: Car or van ownership', Available at <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest/> (Last accessed 04/09/2025)

⁵⁵ Campaign to End Loneliness (2023), 'The State of Loneliness 2023: ONS data on loneliness in Britain', Available at <https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf> (Last accessed 04/09/2025)

by alleviating concerns around displacement and housing insecurity⁵⁶. Site criteria requirements in Policy H5 set out how sites must be in close proximity to service including shops, schools and primary health care facilities. These could particularly benefit residents dependent on access to regular healthcare and educational facilities including children, elderly people, disabled people and pregnant women. The policy also states that sites should promote the peaceful and integrated co-existence with local communities. This could create positive equality outcomes to residents in the sites who are vulnerable to discrimination based on their ethnicity⁵⁷.

- 5.53 Policy H6 sets out the requirements for the provision of specialist housing to meet the needs of older and vulnerable people. These properties must be accessible to nearby shops, and community facilities, and primary health care without access to a car. The provision of specialist housing particularly benefits elderly residents and requires garden spaces which could positively impact elderly people and disabled people who are house-bound and cannot access public open spaces^[OBJ].
- 5.54 The positive impact of providing accessible and adaptable homes for elderly people and those with disabilities and/or long-term health conditions is extended through Policy H7. The compliance of all new dwellings with the accessibility standards set out in part M4(2) of the Building Regulations is likely to advance equality of opportunity for residents with particular access needs and create an inclusive housing stock in Tonbridge and Malling. The requirement to meet M4(3) standards for affordable tenure split could also further aforementioned benefits of affordable housing provision.
- 5.55 Under Policy H8, the opportunity for local people to build custom housing to meet their needs and requirements could benefit groups with distinct needs not covered by design codes and building regulations. This could particularly apply to disabled and elderly residents who require specialist facilities not covered by the requirements of H6.
- 5.56 Policy H9 applies requirements to any new or existing Houses of Multiple Occupation (HMO). These properties provide low-cost housing to groups who cannot afford self-contained accommodation. The requirements state that HMOs must be capable of conversion without causing harm to the amenity of future occupants, benefiting those who are more likely to occupy these properties. This could include young people, low-income residents, ethnic minority groups, people on social housing waitlists, people with mental health conditions, and those who have experienced alcohol and drug dependency and homelessness⁵⁸. Under Policy H9, the development of HMOs must not cause noise issues for occupants or neighbours which could disproportionately benefit people sensitive to noise or people who are more likely to spend time indoors. This could include elderly people, disabled people, people with long-term health conditions and young families⁵⁹. By providing cycle storage and public transport access, the HMOs requirements promote health and well-being for groups without access to private cars (i.e. low-income people) or the inability to drive (disabled people, elderly people, young people)⁶⁰.

⁵⁶ Inclusion Health (2016), *'Impact of insecure accommodation and the living environment on Gypsies' and Travellers' health'*, Available at https://assets.publishing.service.gov.uk/media/5a809a6240f0b62305b8c1c3/NIHB_-_Gypsy_and_Traveller_health_accs.pdf (Last accessed 04/09/2025)

⁵⁷ UK Parliament (2019), *'Tackling inequalities faced by Gypsy, Roma and Traveller communities – Report Summary'*, Available at <https://publications.parliament.uk/pa/cm201719/cmselect/cmwomeq/360/report-summary.html> (Last accessed 04/09/2025)

⁵⁸ lafrati, S. (2021). Supporting Tenants with Multiple and Complex Needs in Houses in Multiple Occupation: The Need to Balance Planning Restrictions and Housing Enforcement with Support. *Social Policy and Society*. 20:1, pp 62-73.

⁵⁹ Public Health England (2018), *'Review and Update of Occupancy Factors for UK Homes'*, Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/763306/review_and_update_of_occupancy_factors_for_uk_homes.pdf (Last accessed 04/09/2025)

⁶⁰ Sustrans (2020), *'Cycling for everyone: A guide for inclusive cycling in cities and towns'*, Available at https://www.sustrans.org.uk/media/7377/cycling_for_everyone-sustrans-arup.pdf (Last accessed 04/09/2025)

5.57 Policy H10 details how alterations and extensions to existing residential properties cannot result in loss of sunlight for neighbouring properties. This could particularly benefit groups who tend to be more likely to spend more time indoors including elderly people, disabled people and young families⁵³. Additional adaptations for accessibility needs should be treated more sensitively, and exceptions may need to be considered.

Health Impact Assessment

5.58 Policy H1 promotes the delivery high-quality and well-designed homes, to meet a range of needs, which is fundamental to supporting healthy communities. By requiring a diverse mix of housing tenures, sizes, and formats, the policy helps ensure that all residents can access suitable and secure accommodation. This would support mental and physical wellbeing by improving housing stability, reducing overcrowding and addressing health inequalities caused by poor or inadequate living conditions.

5.59 The policy also encourages locating housing where residents can benefit from access to essential services, employment opportunities, sustainable transport links, and green spaces. These objectives would be expected to lead to improved opportunities for active travel and social interaction, and healthier lifestyles, which collectively contribute to good physical and mental health.

5.60 Policy H2 supports the delivery of affordable housing to meet identified local needs, requiring 40% on-site provision for most developments. Access to safe, secure, and affordable housing is a key determinant of health, with strong links to mental wellbeing, physical health, and social stability. By seeking to ensure that homes are genuinely affordable and available to those in greatest need, the policy could help reduce housing-related stress, overcrowding, and homelessness, all of which are associated with poorer health outcomes. Additionally, by requiring affordable homes to be well-integrated and indistinguishable from market housing Policy H2 supports inclusive communities and helps to reduce the stigma sometimes associated with affordable housing.

5.61 Policy H3 supports the delivery of Build-to-Rent (BTR) developments that deliver high-quality rental housing with communal facilities in sustainable locations. As a result this would support social interaction, reduce isolation and help improve mental wellbeing. The policy also introduces greater security for tenants through minimum 3-year tenancies and long-term ownership models, which would help to reduce housing instability and the stress associated with short-term rental arrangements. Furthermore, by requiring 20% of homes to be Affordable Private Rent, maintained in perpetuity and built to the same standards as market units, the policy would help improve housing affordability which is likely to reduce health inequalities.

5.62 Policy H4 safeguards existing Gypsy, Traveller, and Travelling Showpeople sites, recognising the importance of housing security for these communities. By ensuring that any loss of pitches is offset by suitable alternatives, the policy supports health and wellbeing by preventing displacement, maintaining access to healthcare and education, and reducing disruption to social cohesion. Correspondingly, Policy H5 sets out clear site criteria to guide the development, expansion, or intensification of Gypsy, Traveller, and Travelling Showpeople sites, supporting several direct benefits for health and wellbeing. New sites are required to be in sustainable locations with good access to schools, healthcare, shops, and public transport promotes integration, accessibility, and social inclusion.

5.63 Policy H6 promotes the delivery of specialist housing for older people and vulnerable groups, ensuring developments are designed to meet the specific needs of future residents. By supporting development in accessible locations, in proximity to

community facilities and with inclusive layouts, the policy enables residents to live independently for longer. These measures support safe, active, and socially connected lifestyles, helping to reduce isolation and improve quality of life.

- 5.64 Supporting Policy H6, Policy H7 seeks to deliver inclusive and accessible housing by requiring that all new dwellings meet the accessibility standards set out in Part M4(2) of the Building Regulations. This ensures that homes are adaptable to the changing needs of occupants over time, supporting independent living and improving long-term housing stability, particularly for older people and those with mobility impairments. This requirement plays a key role in reducing health inequalities by addressing the significant shortfall in suitable accommodation for disabled residents, helping to prevent the physical and mental health challenges that can arise from unsuitable housing.
- 5.65 Policy H8 supports the delivery of self-build and custom housing to diversify the local housing market and increase consumer choice, which overall can have positive implications for health and wellbeing. By enabling residents to design their homes, developments are more likely to reflect lifestyle needs, including accessible layouts and high-quality design, improving both physical and mental wellbeing. The policy would also ensure that self-build homes are delivered in sustainable locations with good access to services, infrastructure, and transport. This could improve residents' ability to access healthcare, employment, education, and recreational opportunities, which are key determinants of health.
- 5.66 Policy H9 concerns proposals for the conversion of existing homes into Houses in Multiple Occupation (HMOs), ensuring that such developments deliver safe, healthy, and good-quality living environments. By setting a clear criteria for minimum living space, good-quality communal facilities, insulation, privacy, and waste storage, the policy would safeguard residents' comfort and wellbeing. These provisions help reduce the potential for stress, conflict, and isolation among occupants while ensuring healthier indoor environments. Requiring HMO sites to provide suitable access, parking, and cycle storage, while prioritising locations near public transport, could promote sustainable travel choices and support residents' access to employment, healthcare, and community services.
- 5.67 Policy H10 does not introduce any additional considerations beyond those already assessed under other policies. As a result, it has been scoped out of the HIA .

Economy and Town centres policies

Policy Area	Scoped in/out	
	EqlA	HIA
Economy and Town Centres		
Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy E2: Strategic Employment Areas	<input type="checkbox"/>	<input type="checkbox"/>
Policy E3: Other Employment Sites, Premises and Floorspace	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Policy E4: Employment and Skills	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy E5: Supporting the Vitality of Town, Service and Local Centres	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy E6: Primary Shopping Areas	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy E7: Above Ground Floorspace	<input type="checkbox"/>	<input type="checkbox"/>

Policy E8: Sequential and Local Impact Tests	☒	☒
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Key: ☑ - Scoped in to assessment, ☒ - Scoped out of assessment

Equalities Impact Assessment

- 5.68 Policy E1, which includes promoting and supporting proposals for new employment floorspaces, could positively impact protected characteristic groups who may be more likely to experience unemployment. This may include young people, ethnic minority groups, and women from ethnic minority backgrounds experiencing intersectional disadvantages⁶¹.
- 5.69 Strategically placing new employment floorspaces near existing transport routes could positively impact groups experiencing transport poverty and those who are less likely to have access to a private car, such as ethnic minority groups, low-income households and those living in rural areas⁶². Equipping these employment floorspaces with cycle storage could also encourage groups underrepresented in cycling figures, including women and older people, to cycle to work⁶³. This could also benefit ethnic minority groups and lower-income residents who are less likely to have access to a private car⁶⁵.
- 5.70 Policy E4 requires proposals for 1,000 sqm of commercial or community use floorspace or residential developments of 20 units or more to submit an Employment and Skills Training Plan. This could positively impact local residents by promoting employment, education and training opportunities, as well as benefitting personal wellbeing. These impacts would be particularly beneficial to groups that tend to experience higher levels of unemployment including young people and ethnic minority groups especially women from ethnic minority backgrounds⁶⁴.
- 5.71 The potential impacts of Policy E2 on protected characteristic groups have been assessed under Policy E1, and therefore has been scoped out of the EqIA.
- 5.72 Supporting the vitality of town, service and local centres covered by Policy E5 may lead to several positive equality impacts for protected characteristic groups. The equality impacts of proposals for the regeneration of the town will depend on the specific objectives and priorities of the regeneration. This may include the provision of enhanced community, leisure and retail services that benefit women who are more likely to make multi-stop journeys⁶⁴, as well as potentially providing local employment opportunities groups more likely to experience unemployment including young people, ethnic minority groups, and disabled people⁶⁵.
- 5.73 Policy E5 further outlines support for town centre proposals that improve accessibility and sustainable travel facilities. This could generate benefits for groups that don't typically have access to private cars or do not have the ability to drive independently, including lower-income residents, those living in rural areas and experiencing transport

⁶¹ UK Government (2024), 'Ethnicity facts and figures: Unemployment', Available at <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest/> (Last accessed 04/09/2025)

⁶² UK Government (2023), 'Ethnicity facts and figures: Car or van ownership', Available at <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest/> (Last accessed 04/09/2025)

⁶³ Sustrans (2020), 'Cycling for everyone: A guide for inclusive cycling in cities and towns', Available at https://www.sustrans.org.uk/media/7377/cycling_for_everyone-sustrans-arup.pdf (Last accessed 04/09/2025)

⁶⁴ Sustrans (2018), 'Are we nearly there yet?: Exploring gender and active travel', Available at <https://www.sustrans.org.uk/media/2879/2879.pdf> (Last accessed 04/09/2025)

⁶⁵ UK Government (2024), 'Ethnicity facts and figures: Unemployment', Available at <https://www.ethnicity-facts-figures.service.gov.uk/work-pay-and-benefits/unemployment-and-economic-inactivity/unemployment/latest/> (Last accessed 04/09/2025)

poverty, elderly people, disabled people, young people and children⁶⁶. Further support for the enhancement of the public realm and preserving local accessible shopping facilities could provide mental health benefits for those seeking independence and social interaction⁶⁷. Although the enhanced public realm would positively impact all residents of the borough, this policy may particularly benefit groups more vulnerable to social isolation including elderly people, young people, and rural communities⁶⁸.

- 5.74 Policy E5 also commits to positive wellbeing and placemaking through supporting the enhancement of heritage assets and their setting. This could positively impact religious and ethnic minority groups if religious sites, such as historic places of worship, are considered as heritage assets.
- 5.75 Under Policy E6, TMBC commit to supporting and encouraging the development of shopping areas where designs are accessible for all users. This could help secure independence and social interaction for those with disabilities and mobility requirements, including elderly people, disabled people, and pregnant women³⁶.
- 5.76 All other Economy and Town Centres policies do not introduce any additional considerations beyond those already assessed within this theme or are not considered relevant to any particular protected characteristic group/s. As a result, they have been scoped out of the EqIA.

Health Impact Assessment

- 5.77 Access to secure, good quality employment is a key determinant of health and wellbeing. Fulfilling work contributes to financial security, improved self-esteem, and social connection, while also enabling individuals to make lifestyle choices that promote good physical and mental health. Conversely, unemployment and underemployment are associated with poorer health outcomes and reduced quality of life.
- 5.78 Policy E1 aims to enhance economic conditions within the borough by supporting job creation, skills development, and sustainable development, which overall would be expected to have positive implications for health and wellbeing. The policy aims to support proposals that address local skill shortages, encourage local employment, and enable re-skilling and training. By including these measures, the policy can help reduce economic inactivity, improve residents' mental wellbeing and enhance quality of life, particularly in communities most affected by economic and social disadvantage. Policy E1 also supports proposals seeking to improve access to new and existing employment floorspaces, which would be effective in ensuring that economic growth translates into meaningful health gains for all residents. It could go further by encouraging provision being made within new developments for a range of business types which could assist in employment opportunities being accessible to a wider range of population groups whose health would benefit from being employed as possible.
- 5.79 Policy E1's emphasis on sustainable economic development further enhances its contribution to health. The policy specifically encourages energy-efficient and sustainably constructed business premises, and as such it would directly contribute to improved environmental quality and resilience to climate change. In promoting digital

⁶⁶ UK Government (2023), 'Ethnicity facts and figures: Car or van ownership', Available at <https://www.ethnicity-facts-figures.service.gov.uk/culture-and-community/transport/car-or-van-ownership/latest/> (Last accessed 04/09/2025)

⁶⁷ UK Government (2024), 'Accessibility of products and services to disabled people', Available at <https://publications.parliament.uk/pa/cm5804/cmselect/cmwomeq/605/report.html> (Last accessed 04/09/2025)

⁶⁸ Campaign to End Loneliness (2023), *The State of Loneliness 2023: ONS data on loneliness in Britain*, Available at <https://www.campaigntoendloneliness.org/wp-content/uploads/The-State-of-Loneliness-2023-ONS-data-on-loneliness-in-Britain.pdf> (Last accessed 04/09/2025)

infrastructure and supporting home working, where appropriate, the policy also contributes to more flexible, health-supportive working conditions. Additionally, by ensuring proposals deliver environmental and climate change policy requirements such as locating new employment premises near to public transport corridors or integrating active travel infrastructure such as cycle storage, the policy would evidently support healthier travel behaviours and improve access to work for people affected by transport poverty, including those without access to a private car.

- 5.80 The potential impacts of Policy E2 and E3 on health have been assessed under Policy E1 and therefore has been scoped out of the HIA.
- 5.81 Policy E4 requires the submission of an Employment and Skills Training Plan for proposals for 1,000 sqm of commercial or community use floorspace or for residential developments of 20 units or more. This can enhance local employment outcomes and provide new pathways into education, training and work, contributing positively to personal wellbeing and economic inclusion. Additional focus within the Employment and Skills Training Plans on supporting groups overrepresented in unemployment, such as young people and ethnic minority residents, could further strengthen positive outcomes for health, equality, and community resilience.
- 5.82 Policy E5 seeks to protect and enhance the vitality of town, service and local centres across the borough, recognising their important role in supporting the health and wellbeing of residents and visitors. Healthy and thriving centres with a diverse mix of uses can foster inclusive, sociable places that meet everyday needs and promote active, connected communities. The policy supports proposals that positively contribute to placemaking and wellbeing through improvements to the public realm, enhanced accessibility, and measures that strengthen local identity. Urban greening and the integration of blue and green infrastructure are particularly encouraged by the policy, which will offer benefits such as improved air quality, opportunities for physical activity, and mental health benefits associated with contact with nature.
- 5.83 All other Economy and Town Centre policies are not considered relevant to health or the impacts have been assessed under other thematic policies and have therefore been scoped out of the HIA.

Rural Policies

Policy Area	Scoped in/out	
	EqIA	HIA
Policy R1: Rural Exception Sites	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R2: Housing for Rural Workers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R3: Replacement Dwellings Outside Settlement Confines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R4: Conversion of an existing building to residential use outside settlement confines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R5: Residential Parks	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R6: Employment development outside existing settlement confines	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R7: Agriculture, forestry and horticulture	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R8: Farm diversification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R9: Sustainable tourism and visitor accommodation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Policy R10: Equestrian facilities in the countryside	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Key: ☑ - Scoped in to assessment, ☒ - Scoped out of assessment

Equality Impact Assessment

5.84 All Rural policies are not considered relevant to any particular protected characteristic group/s or the potential equality impacts have been assessed under other thematic policies (including Infrastructure and Housing) and have therefore been scoped out of the EqIA.

Health Impact Assessment

5.85 All Rural policies are not considered relevant to health or the potential health impacts have been assessed under other thematic policies (including Infrastructure and Housing) and have therefore been scoped out of the HIA.

Infrastructure policies

Policy Area	Scoped in/out	
	EqIA	HIA
Infrastructure		
Policy INF1: Provision of Infrastructure and Services	☑	☑
Policy INF2: Sustainable Transport and Active Travel	☑	☑
Policy INF3: Parking	☑	☑
Policy INF4: Community Facilities	☑	☑
Policy INF5: Outdoor and Indoor sports, recreation and open space provision	☑	☑

Key: ☑ - Scoped in to assessment, ☒ - Scoped out of assessment

Equality Impact Assessment

5.86 Policy INF1 includes the provision of new healthcare, education facilities and other services strategically placed in locations which relate to both new and existing developments. This promotes positive equality impacts for groups that more heavily rely on these services including disabled people, elderly residents, pregnant women and young people⁶⁹. Additionally, the requirement for these services to be located in areas accessible by existing or new/improved public transport services could particularly benefits groups who rely on public transport more heavily. This could include women and low-income groups who are less likely to have access to private cars, elderly people and disabled people⁷⁰.

5.87 Under Policy INF2, enhancing existing public transport (e.g. bus and rail services) could positively impact groups that most rely on these services including elderly people, young people, and low-income residents. In particular, the inclusion of wheeling provisions at rail stations could promote positive inclusion and accessibility for disabled and elderly people, making them more able to use public transport

⁶⁹ BMJ (2024), 'Access to healthcare is much worse for certain patient groups, finds analysis', Available at <https://www.bmj.com/content/387/bmj.g2235> (Last accessed 05/09/2025)

⁷⁰ Department for Transport (2023), 'National Travel Survey 2023: Trends in public transport use and multi-modal public transport trips', Available at <https://www.gov.uk/government/statistics/national-travel-survey-2023/nts-2023-trends-in-public-transport-use-and-multi-modal-public-transport-trips> (Last accessed 05/09/2025)

independently⁷¹. Further, connecting rural areas with key services may minimise the risk of isolation⁷² for rural residents which are more likely to be elderly people⁷³.

- 5.88 Supporting safe traffic and highway design in Policy INF2, including encouraging slower driving speeds, could have a disproportionately positive impact on groups vulnerable to pedestrian casualties including children and those with reduced mobility⁷⁴. Policy INF2 states that active travel infrastructure should be accessible and inclusive in design and that cycleways should provide enough space for adapted cycles such as tricycles, tandems, and wheelchair cycles. This may positively impact protected characteristic groups including disabled and elderly residents, by providing travel infrastructure which is accessible to their needs.
- 5.89 Policy INF3 focusses on improving existing parking facilities and developing new parking within Tonbridge and Malling. Locating parking facilities near public transport could benefit groups who are more likely to rely on public transport including elderly people, young people, and low-income residents⁵⁵. There could also be particular benefits for women, who have been shown to be more likely to make multi-stop journeys⁷⁵. Additionally, integrating appropriate levels of disabled parking, parking for mobility aids and adaptive bicycles positively impacts elderly and disabled residents who rely on these services.
- 5.90 Policy INF4 outlines the requirement that any closures of community facilities are met with new provisions of removed services. This is expected to minimise negative equality impacts for groups who rely on these most including disabled people, young people, and ethnic minority groups⁷⁶. Providing access to new community facilities by wheeling and providing disabled toilets promotes positive equality impacts for disabled and elderly people. Furthermore, designing new community facilities in a way that reduces crime and anti-social behaviour encourages use for groups who are disproportionately vulnerable to harassment. This includes residents who experience discrimination based on their sexual orientation, gender, history of gender reassignment, disability or age⁷⁷.
- 5.91 The provision of new or enhanced open space through Policy INF5 could benefit low-income households who do not have access to private gardens⁷⁸. Open spaces which are made safe and accessible may also promote social interaction and independence for elderly residents⁷⁹.

⁷¹ Swift, A., Cheng, L., Loo, B.P.Y., Cao, M., Witlox, F. (2021), 'Step-free railway station access in the UK: the value of inclusive design', Available at <https://etr.springeropen.com/articles/10.1186/s12544-021-00504-3> (Last accessed 05/09/2025)

⁷² Department for Transport (2024), 'The role of transport in tackling loneliness', Available at <https://www.gov.uk/government/publications/the-role-of-transport-in-tackling-loneliness> (Last accessed 05/09/2025)

⁷³ Department for Environment, Food & Rural Affairs (2021), 'Rural population and migration', Available at <https://www.gov.uk/government/publications/the-role-of-transport-in-tackling-loneliness> (Last accessed 05/09/2025)

⁷⁴ Department for Transport (2015), 'Facts on Pedestrian Casualties', Available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/448036/pedestrian-casualties-2013-data.pdf (Last accessed 05/09/2025)

⁷⁵ Sustrans (2018), 'Are we nearly there yet?': Exploring gender and active travel, Available at <https://www.sustrans.org.uk/media/2879/2879.pdf> (Last accessed 04/09/2025)

⁷⁶ New Local (2025), 'Where People Meet: How We Celebrate, Sustain and Reimagine Community Centres', Available at <https://www.newlocal.org.uk/publications/where-people-meet/> (Last accessed 05/09/2025)

⁷⁷ More in Common (2023), 'Rapid Evidence Review on Harassment and Censorship', Available at https://assets.publishing.service.gov.uk/media/65fd7b5565ca2f001b7da8c5/Rapid_Evidence_Review_on_Harassment_and_Censorship.pdf (Last accessed 04/09/2025)

⁷⁸ Office for National Statistics (2020), 'One in eight British households has no garden', Available at <https://www.ons.gov.uk/economy/environmentalaccounts/articles/oneineightbritishhouseholdshasnogarden/2020-05-14> (Last accessed 05/09/2025)

⁷⁹ Younes, S.R., Marques, B., McIntosh J. (2024), 'Public Spaces for Older People: A Review of the Relationship between Public Space to Quality of Life', Available at <https://www.mdpi.com/2071-1050/16/11/4583> (last accessed 05/09/2025)

Health Impact Assessment

- 5.92 Infrastructure and services are important for creating and sustaining healthy communities, such as healthcare and education facilities. Policy INF1 supports the delivery of essential services in locations accessible to both new and existing developments. It also seeks to locate services where they are easily accessible by public transport, walking, wheeling, and cycling. Together, these measures help ensure residents have timely access to community facilities, promoting use of healthcare services and improving physical and mental health outcomes. They would also encourage healthier travel behaviour, reduce car dependency, and support more active lifestyles. Policy INF1 also supports developments that deliver carbon neutral utilities schemes which overall will contribute to reducing emissions and therefore improving general environmental health, through better air quality and climate-change resilience.
- 5.93 Policy INF2 promotes the development of accessible and inclusive active travel infrastructure, which is key to supporting healthy, active communities. Encouraging walking, cycling, and public transport use over car dependency would directly support physical activity and reduce the risk of obesity, cardiovascular disease, and other conditions. By enhancing the borough's bus and rail networks and developing accessible and safe cycleways, the policy would make public transport more appealing, reduce isolation between urban and rural areas and support social cohesion.
- 5.94 Policy INF2 sets out support for developments encouraging safer road layouts, slower traffic speeds, and the prioritisation of non-motorised users, which would help reduce the risk of traffic collisions and support safer neighbourhoods. Collectively, these measures help promote healthier, more resilient communities by creating environments that support physical activity, reduce pollution, and potentially encourage social connectedness.
- 5.95 The need for well-designed and appropriately located parking facilities that integrate with public transport and active travel networks is set out under Policy INF3. A parking strategy that accommodates vehicles while encouraging sustainable transport can support healthier travel choices and reduce congestion and pollution. By providing electric vehicle and bicycle charging points, as well as secure cycle and motorcycle storage, it is clear the policy would promote low-emission and active transport modes, which contribute to improved air quality and levels of physical activity.
- 5.96 Policy INF4 promotes the protection, improvement, and creation of community facilities, which are vital for supporting health and wellbeing by ensuring residents can access places that offer social connection, support services, and opportunities for physical and cultural activities. By securing the long-term presence of these facilities, the policy helps reduce isolation, improve service accessibility, and foster inclusive, supportive communities.
- 5.97 Improvements to existing community facilities could also be targeted through the policy so that the same standards of quality and service provision exist across the borough, ensuring all residents have access to facilities that meet their needs.
- 5.98 Similarly, Policy INF5 supports the delivery and protection of open spaces, sports, and recreation facilities, which are crucial for promoting physical activity, reducing stress, and improving mental health. By encouraging walking, exercise, and social interaction, outdoor play and engagement with nature, the policy supports more active, connected and resilient lifestyles.

Development Allocations

5.99 To meet the identified need for new housing and employment land to 2042, Tonbridge and Malling has proposed sites for housing and employment allocation under Policy A1 (Housing and Employment Allocations). As the policy states all allocations must be delivered in accordance with the development plan, Policy A1 has not been assessed individually. Providing the other policies are adhered to in each site allocation, the assessment of impacts for the housing and employment allocations are covered in the thematic policy EqIA and HIA assessments.

6. Conclusions and recommendations

Overview

- 6.1 The EqIA and HIA for Tonbridge and Malling Local Plan highlight the significant potential for the plan to positively influence equality of opportunity and physical and mental health across the borough. Through identifying nine different themes for policies, the Local Plan aims to create an inclusive environment across the borough that fosters good relations and better health outcomes for all residents. Conclusions regarding the assessment of these policies are set out below for equalities and health respectively, followed by recommendations for how policies could be strengthened or enhanced to maximise positive impacts where practical.

Conclusions

Equalities

- 6.2 Design Policies D1 and D2 outline aim to deliver high-quality, inclusive design that supports health, wellbeing, and accessibility for all residents, particularly those from protected characteristic groups. These outcomes will be achieved through compliance with national and local design codes, meaningful community engagement, and the integration of inclusive infrastructure and adaptable housing solutions.
- 6.3 Economy and Town Centre Policies E1, E3 and E4 aim to promote inclusive economic growth by supporting access to new job opportunities, training, and skills development for groups disproportionately affected by unemployment. These positive equality impacts will be achieved through strategic site placement, inclusive infrastructure, and targeted Employment and Skills Training Plans that contribute to addressing the needs of underrepresented groups.
- 6.4 Economy and Town Centre Policies E5, E6 and E8 recognise the importance of promoting social inclusion, wellbeing and economic opportunity for protected characteristic groups. These impacts could be realised through inclusive design, strategic location of services, and the use of Impact Assessments to guide regeneration and development proposals in meeting diverse community needs.
- 6.5 Historic Environment Policies HE1 and HE2 support cultural inclusion and identity by protecting and enhancing heritage assets with religious significance, which may positively impact religious and ethnic minority groups.
- 6.6 Housing Policies H1-H10 outline a comprehensive delivery of inclusive, accessible, and affordable homes that meet the diverse needs of Tonbridge and Malling's communities, particularly those from protected characteristic groups. Positive equality impacts are anticipated through a combination of tenure diversity, accessible design standards, targeted provision for vulnerable groups, and location strategies that support access to essential services and community infrastructure.
- 6.7 Infrastructure Policies INF1-INF5 provide a framework to improve access to essential services, transport, and community facilities in ways that support the wellbeing, independence, and inclusion of protected characteristic groups. These positive equality impacts will be delivered through inclusive design and accessibility measures that respond to the needs of disabled people, elderly residents, low-income households, and other groups reliant on public services and transport.
- 6.8 Climate Change Policies CC1, CC3, CC4 and CC5 target a reduction in living costs and improvement in environmental quality to deliver positive equality impacts for

groups disproportionately affected by energy poverty and poor air quality. These benefits could be achieved through energy-efficient design, sustainable transport measures, and careful consideration of the physical and sensory impacts of renewable energy infrastructure on vulnerable residents.

- 6.9 Natural Environment Policies NE6, NE9, NE10 and NE12 promote safe, inclusive, and healthy spaces by enhancing green infrastructure and reducing air, noise and light pollution. These measures could support positive equality outcomes for those more vulnerable to social exclusion and negative health effects associated with their environment.
- 6.10 Spatial Strategy SP7 and SP8 supports inclusive and accessible development within Green Belt land in alignment with design standards and affordable housing provision.

Health

- 6.11 Design Policies D1 and D2 provide a strong framework for the delivery of well-designed, inclusive, and sustainable places that actively support health and wellbeing. They will help to create resilient, attractive, and health-supportive environments where people can live well, stay active, and feel connected to their communities.
- 6.12 Economy and Town Centre Policies E1 and E4 establish a strong link between economic development and improved health and wellbeing outcomes. These policies will support more resilient communities by improving access to meaningful work, reducing inequalities, and enabling healthier, more secure lifestyles for residents across the borough.
- 6.13 Economy and Town Centre Policies E5 and E6 clearly recognise the important role that town centres play in supporting health and wellbeing and protecting this. In encouraging proposals towards sustainable development via a range of requirements and providing spatial direction for development of shopping and service opportunities which ensure accessibility, they will serve to sustain good physical and mental health for residents of and visitors to the borough.
- 6.14 Historic Environment Policies HE1, HE3 and HE4 will secure borough residents access to a well-maintained, high quality historic environment. This will promote good mental health and wellbeing particularly by sustaining and enhancing a strong sense of place, identity, and cultural continuity.
- 6.15 Housing Policies H1-H9 provide a comprehensive plan for safeguarding homes, providing new homes and affordable homes, and appropriate specialist accommodation and sites to meet the needs of all the borough's residents. These will support healthy neighbourhoods and social cohesion through providing for good design, appropriate access, choice, security of tenure and genuine affordability at sustainable locations.
- 6.16 Infrastructure Policies INF1-5 ensure that infrastructure and services are safeguarded and provided that meet needs in a sustainable manner. The policies will create and sustain healthy communities by supporting physical activity and healthy lifestyles, reducing pollution, and encouraging social connectedness.
- 6.17 Climate Change Policies CC1-CC8 underpin a plan which is prioritising interventions that address health inequalities and climate change to serve the needs of the residents which need it most. They protect livelihoods and promote good developments through building resilience to climate impacts while supporting healthier, safer, and more comfortable environments for future residents and communities.

- 6.18 Natural Environment Policies NE1-NE12 promote healthier places by protecting biodiversity, safeguarding landscapes, minimising pollution, and expanding access to green and blue infrastructure. Together, these policies create conditions that support improved physical and mental health, reduce environmental risks, and enhance resilience to climate change.
- 6.19 Spatial Strategy SP8 and SP9 preserves and supports appropriate enhancements to the Green Belt, with positive implications for both physical and mental health of residents and visitors by supporting and encouraging access to activity and recreation.

Recommendations

- 6.20 To further mitigate equality and health impacts, a number of recommendations are listed below. This list is not exhaustive, and recommendations may already be considered in the Local Plan.

Equalities

- **Town Centre Policy E5:** It is recommended that an EqIA be carried out for each individual town centre regeneration proposal being considered, alongside other relevant impact assessments where appropriate, to assess the potential effects on protected characteristic groups and the PSED outlined in the Equality Act 2010.
- **Housing Policy H10:** Applications for residential extensions, alterations, annexes to fulfil accessibility needs should be treated more sensitively, and exceptions to the requirements outlined in Policy H10 may need to be considered.
- **Natural Environment Policy NE6:** It is recommended that green infrastructure spaces could enhance the safety of these protected characteristic groups by including CCTV or natural surveillance for groups vulnerable to harassment, including women, ethnic minorities, religious groups and those with a history of gender reassignment, as well as accessibility and seating for elderly and disabled residents.

Health

- **Design Policy D1 and D2:** Securing design quality should not come at the expense of affordable housing, in order that first time buyers and those on lower incomes remain able to buy into the property market and not be priced out, or not have access to quality development.
- **Policy E1:** Encouraging provision being made within new developments for a range of business types within the policy could assist in employment opportunities being accessible to a wider range of population groups whose health would benefit from being employed.
- **Infrastructure Policy INF4:** Improvements to existing community facilities should be targeted through the policy so that the same standards of quality and service provision exist across the borough, ensuring all residents have access to facilities that meet their needs.

