

Tonbridge and Malling Local Plan: Draft (Regulation 18) Local Plan

Sustainability Appraisal Report

Tonbridge and Malling Borough Council

Final report

Prepared by LUC

November 2025

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Tonbridge and Malling Local Plan: Draft (Regulation 18) Local Plan

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Chapter 1

Introduction

1.1 Tonbridge and Malling Borough Council (TMBC) has commissioned LUC to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the emerging Tonbridge and Malling Local Plan. Once adopted, the new Local Plan will replace the current Local Development Framework which comprises the adopted Core Strategy (September 2007), Development Land Allocations Development Plan Document (DPD) (2008), Tonbridge Central Area Action Plan (2008) and Managing Development and the Environment DPD (2010). This report relates to the Regulation 18 Draft Local Plan (2025), and it should be read in conjunction with that document.

1.2 This report is in an 'Accessible format', which means that it has been formatted to meet the requirements of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations (2018), as set out in the Web Content Accessibility Guidelines (WCAG 2.1). This means it must have a larger font size, larger spacing between lines and headings, less information presented in tables, 'alt text' provided for all figures and that it is able to be read by screen-reading software.

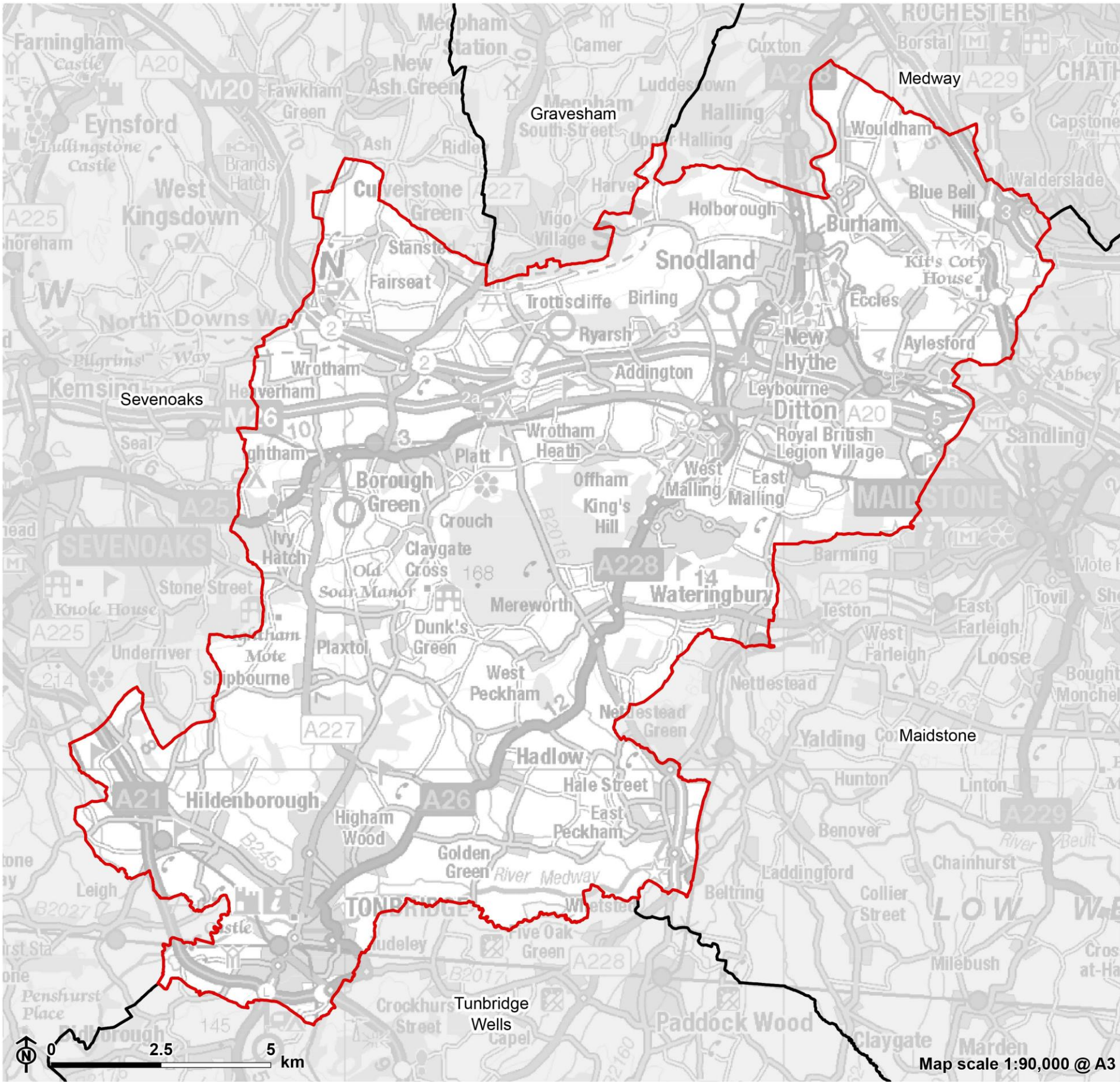
The Local Plan area

1.3 Tonbridge and Malling Borough is one of 12 district/borough council areas within the county of Kent in South East England. The population of Tonbridge and Malling is approximately 136,853 people. The borough is bordered by Sevenoaks to the west, Tunbridge Wells to the south, Maidstone to the east and Gravesham and Medway to the north. Most of the borough is rural in character, with several villages and small towns. The main town within the borough is Tonbridge including Hilden Park, with further built-up areas including Borough Green, Kings Hill, Snodland and Ham Hill, and the Medway Gap. The location of Tonbridge and Malling Borough is presented in Figure 1.1 below.

1.4 The borough benefits from its proximity to London and the South East coast. There are three main railway lines (Kent Downs Line, Medway Valley Line and South Eastern Main Line) that pass through the borough, providing access to London, Sevenoaks, Maidstone, Strood, Aylesford, Ashford, Dover, Ramsgate via Canterbury West and Hastings via Tunbridge Wells, in addition to other towns and villages in-between these settlements. The Channel Tunnel Rail Link is channelled under the Kent Downs. Within the borough there are various

strategic key routes, including the A20, M20, A21, A227, A228, M2, A25, A26, A229 and M26. These roads connect the borough to wider transport networks including the M25 motorway and channel ports. Tonbridge and Malling Borough includes the Kent Downs National Landscape (formerly referred to as an Area of Outstanding Natural Beauty or AONB) in the north, and the High Weald National Landscape in the south. The majority of the borough is designated as Green Belt. There are also several international, national and local environmental designations.

Figure 1.1: Location of Tonbridge and Malling Borough



Local Plan Sustainability Appraisal
Tonbridge and Malling Borough Council



Figure 1.1: Location of Tonbridge and Malling Borough

- Tonbridge and Malling boundary
- Neighbouring local authority

The Tonbridge and Malling Local Plan

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

- Core Strategy 2007-2021 (adopted September 2007);
- Development Land Allocations DPD (adopted April 2008);
- Tonbridge Central Area Action Plan (adopted April 2008);
- Managing Development and the Environment DPD (adopted April 2010);
- Kent Minerals and Waste Local Plan 2024-39 (adopted March 2025).

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

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

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

1.9 Following withdrawal of this Local Plan, the Council recommenced plan-making in Autumn 2021. An early Regulation 18 Local Plan consultation was undertaken from September to November 2022, and an SA Report was prepared and consulted on alongside the Local Plan. Following this consultation, the Council had been working on a second Regulation 18 Local Plan.

1.10 Following the general election in July 2024, the new Labour Government proposed significant reforms to the NPPF, which were consulted upon from July to September 2024, alongside other planning reforms. Given the extent of changes proposed, the Council paused its plan-making process until the new NPPF was published in December 2024. The plan-making process has now restarted.

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

Outline of the Tonbridge and Malling Local Plan

1.12 The Regulation 18 Draft Local Plan sets out an overarching Vision for the Borough by 2042, which is supported by seven overarching objectives. There are then 71 policies within the Local Plan consultation document, which is structured as follows:

■ Spatial Strategy

- SP1 Spatial Strategy
- SP2 Delivering Homes for our Communities
- SP3 Settlement Hierarchy and General Development Principles
- SP4 Gypsy, Traveller and Travelling Showpeople - Accommodation Needs
- SP5 Future Employment Growth
- SP6 Town Centre Needs
- SP7 Green Belt
- SP8 Managing Development in the Green Belt
- SP9 Local Green Gap

■ Climate Change

- CC1 Strategic Climate Change
- CC2 Circular Economy
- CC3 Sustainable Design and Construction
- CC4 Energy and Heating
- CC5 Renewable and Low Carbon and Heat Projects
- CC6 Water Efficiency
- CC7 Managing Development within Flood Risk Areas
- CC8 Sustainable Drainage Systems (SUDS)

■ Natural Environment

- NE1 Conserving and Enhancing the Natural Environment
- NE2 National Landscapes
- NE3 Landscape character
- NE4 Designated Sites, Irreplaceable Habitat and Priority Habitat and Species
- NE5 Biodiversity Net Gain
- NE6 Green and Blue Infrastructure
- NE7 Woodland, Trees and Hedgerows
- NE8 Best and Most Versatile Agricultural Land
- NE9 Noise, Vibration and Odour
- NE10 Air Quality
- NE11 Ground Contamination
- NE12 Light Pollution
- Historic Environment
 - HE1 The Historic Environment
 - HE2 Listed Buildings
 - HE3 Conservation Areas
 - HE4 Historic Parks and Gardens (designated and non-designated)
 - HE5 Archaeology
 - HE6 Enabling Development for Heritage Assets
- Design
 - D1 Achieving High Quality Design
 - D2 Design Codes and Masterplans
- Housing
 - H1 Housing to Address Needs
 - H2 Affordable Housing
 - H3 Build to Rent
 - H4 Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites
 - H5 Gypsy, Traveller and Travelling Showpeople – Site Criteria
 - H6 Specialist Housing to Meet the Needs of Older and Vulnerable People

- H7 Accessible and Adaptable Homes
- H8 Self and Custom Build Housing
- H9 Houses in Multiple Occupation
- H10 Residential Extensions, Alterations, Annexes and Ancillary Accommodation
- Economy and Town Centres
 - E1 Supporting a Prosperous, Inclusive and Sustainable Economic Future
 - E2 Strategic Employment Areas
 - E3 Other Employment Sites, Premises and Floorspace
 - E4 Employment and Skills
 - E5 Supporting the Vitality of Town, Service and Local Centres
 - E6 Primary Shopping Areas
 - E7 Above Ground Floorspace
 - E8 Sequential and Local Impact Tests
- Rural Policies
 - R1 Rural Exception Sites
 - R2 Housing for Rural Workers
 - R3 Replacement Dwellings Outside Settlement Confines
 - R4 Conversion of An Existing Building To Residential Use Outside Settlement Confines
 - R5 Residential Parks
 - R6 Employment development outside existing settlement confines
 - R7 Agriculture, forestry and horticulture
 - R8 Farm diversification
 - R9 Sustainable tourism and visitor accommodation
 - R10 Equestrian facilities in the countryside
- Infrastructure
 - INF1 Provision of Infrastructure and Services
 - INF2 Sustainable Transport and Active Travel
 - INF3 Parking

- INF4 Community Facilities
- INF5 Outdoor and Indoor sports, Recreation and Open Space Provision
- Development Allocations
 - A1 Site Allocations

Sustainability Appraisal and Strategic Environmental Assessment

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

1.14 In October 2023, the Levelling Up and Regeneration Bill received royal assent. The Levelling-up and Regeneration Act 2023 outlines a number of reforms to the planning system, including the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report (EOR). The specific requirements will be set out in forthcoming regulations, along with information about transition arrangements; however, at present the requirement for SEA remains as set out in existing legislation. Any changes to the legal framework for carrying out SA/SEA will be addressed as appropriate as the Local Plan is prepared.

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

1.16 The SA process comprises a number of stages, as shown below.

- Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope.

- Stage B: Developing and refining options and assessing effects.
- Stage C: Preparing the SA Report.
- Stage D: Consulting on the Local Plan and the SA Report.
- Stage E: Monitoring the significant effects of implementing the Local Plan.

Habitats Regulations Assessment

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

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

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

Meeting the requirements of the SEA Regulations

1.20 The relevant sections of this SA Report that are considered to meet the SEA Regulations requirements are signposted below. This information will be included in the full SA Report at each stage of plan-making to show how the requirements of the SEA Regulations have been met throughout the SA process.

Environmental report

1.21 The SEA Regulations [\[See reference 5\]](#) require the responsible authority to prepare, or secure the preparation of, an 'environmental report', which in this

case will comprise the SA report. The report shall identify, describe, and evaluate the likely significant effects on the environment of the following (requirements in green shaded text and where each requirement is met is provided in bullets below):

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

- Covered in Chapter 1, Chapter 3 and Appendix B.

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

- Covered in Chapter 3 and Appendix B

The environmental characteristics of areas likely to be significantly affected.

- Covered in Chapter 3 and B.208.

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

- Covered in Chapter 3 and Appendix B.

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

- Covered in Chapter 3 and Appendix B.

The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as – (a) biodiversity; (b) population; (c) human health; (d)

fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues.

- Covered in Chapter 4, Chapter 5, Chapter 6 and Chapter 7

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

- Covered in Chapter 4, Chapter 5, Chapter 6 and Chapter 7

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

- Covered in Chapter 2.

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

- Covered in Chapter 8.

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

- A separate non-technical summary document has been prepared to accompany this report.

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

- current knowledge and methods of assessment;
- the contents and level of detail in the plan or programme;
- the stage of the plan or programme in the decision-making process; and

- the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

- The environmental report at each stage of the SA will adhere to this requirement.

1.22 In terms of consultation, the SEA Regulations require that:

- When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.
- The SA Scoping Report was subject to consultation with the statutory bodies in April to June 2025. The comments received are summarised in Appendix A and a response provided to each. The SA Scoping Report was updated in response to the comments received.

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

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

- send a copy of those documents to each consultation body;
- take such steps as it considers appropriate to bring the preparation of the relevant documents to the attention of the persons who, in the authority’s opinion, are affected or likely to be affected by, or have an interest in the decisions involved in the assessment and adoption of the plan or programme concerned, required under the Environmental assessment of Plans and Programmes Directive (“the public consultees”);
- Inform the public consultees of
 - the address of the website at which the relevant documents may be viewed and downloaded free of charge;

- the fact that a copy of the relevant documents may be obtained by email from the responsible authority;
 - the fact that a copy of the relevant documents may be obtained by post from the responsible authority, provided that it is reasonably practicable for the authority to provide a copy by post;
 - the address, email address and telephone number for the purpose of requesting a copy of the relevant documents either by email or by post;
 - whether a charge will be made for copies of the relevant documents provided by post and the amount of any charge; and
 - the telephone number which can be used to contact the responsible authority for enquiries in relation to the relevant documents;
- invite the consultation bodies and the public consultees to express their opinion on the relevant documents, specifying the address to which, and the period within which, opinions must be sent.

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

- Consultation on the Regulation 18 Draft Local Plan is taking place between November 2025 and January 2026. The Regulation 18 Draft Local Plan is accompanied by this SA Report.

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

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

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

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

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

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

- To be addressed after the Local Plan is adopted.

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

- how environmental considerations have been integrated into the plan or programme;
- how the environmental report has been taken into account;
- how opinions expressed in response to (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;
- how the results of any consultations entered into under regulation 14(4) have been taken into account;

- the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

- To be addressed after the Local Plan is adopted.

- The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.

- Chapter 8 proposes a framework for monitoring the likely significant effects of the Local Plan.

Structure of the SA Report

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

- Chapter 2 describes the approach that is being taken to the SA of the Tonbridge and Malling Local Plan.
- Chapter 3 describes the relationship between the Local Plan and other relevant plans, policies and programmes; summarises the environmental, social and economic characteristics of Tonbridge and Malling and identifies the key sustainability issues facing the borough.
- Chapter 4 presents the SA findings for the spatial growth options that have been considered for the Local Plan.
- Chapter 5 presents the SA findings for the reasonable alternative development site options that have been considered for inclusion in the Local Plan.
- Chapter 6 presents the SA findings for the policies contained within the Draft Local Plan.
- Chapter 7 presents the total combined effects of the Draft Local Plan as a whole, referred to as the cumulative effects.

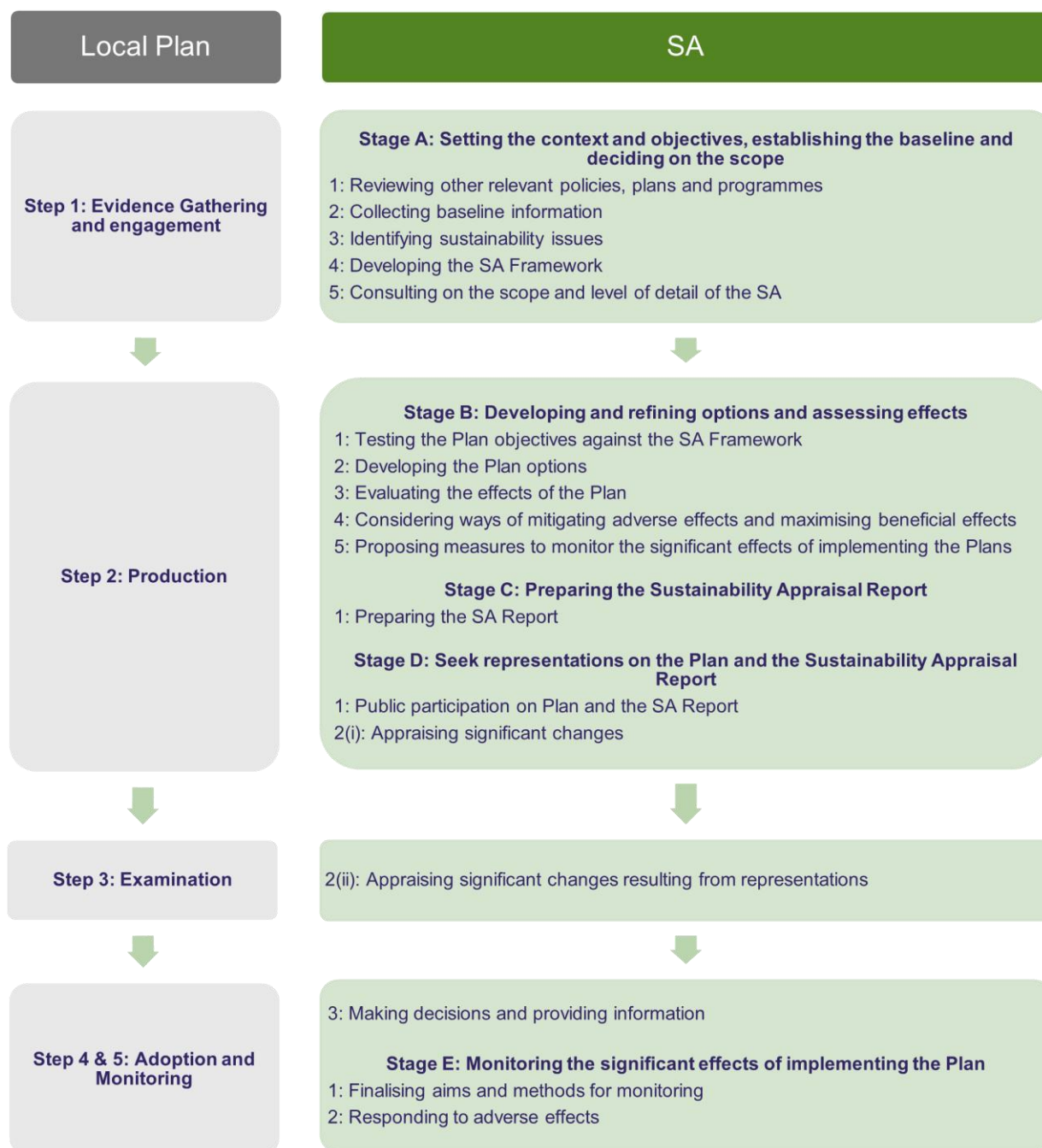
- Chapter 8 presents suggested indicators for monitoring the potential sustainability effects of the Local Plan.
- Chapter 9 summarises the conclusions of the SA of the Regulation 18 Draft Local Plan and describes the next steps to be undertaken.
- Appendix A presents a summary of the consultation comments received in relation to the SA Scoping Report and a response to each.
- Appendix B presents a review of international, national and local plans, policies and programmes of relevance to the SA.
- Appendix C presents the baseline information for Tonbridge and Malling Borough.
- Appendix D presents the criteria and assumptions that have been used to ensure consistency in the SA of the reasonable alternative site options.

Chapter 2

Methodology

2.1 In addition to complying with legal requirements, the approach being taken to the SA of the Tonbridge and Malling Local Plan 2042 is based on current good practice and the guidance on SA/SEA set out in the Government's Planning Practice Guidance (PPG). This calls for the SA to be carried out as an integral part of the plan-making process.

Figure 2.1: Corresponding stages in plan-making and SA



2.2 The sections below describe the approach that has been taken to the SA of the Local Plan to date and provide information on the subsequent stages of the process.

Stage A: Scoping

2.3 The Scoping stage of SA involves understanding the environmental, social and economic baseline for the plan area as well as the sustainability policy context and key sustainability issues and using these to inform the appraisal framework as follows. A Scoping Report for the new Local Plan was prepared by JBA Consulting and consulted on in 2022. However, following the pause in plan-making and due to the time that had passed since the original Scoping Report was prepared and consulted on and the changes in national policy, guidance and legislation since then, TMBC decided to re-consult on the scope of the SA. The updated SA Scoping Report was prepared by LUC and consulted on with the statutory consultees from April to June 2025. A final post-consultation version of the report was produced in June 2025. The Scoping Report included the following elements of work.

Review other relevant plans, policies and programmes to establish the policy context

2.4 A Local Plan is not prepared in isolation; rather it is prepared within the context of other plans, policies and programmes. The SEA Regulations require the environmental report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national and regional/sub-regional levels.

2.5 A review was therefore undertaken of other plans, policies and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Tonbridge and Malling Local Plan.

2.6 The policy review has since been updated as part of the preparation of this report and is presented in Chapter 3 and Appendix B.

Collect baseline information to establish sustainability context

2.7 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.

2.8 Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the plan to understand the likely future sustainability conditions in the absence of the plan.

2.9 The SEA Regulations require the environmental report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future, together with the assessed effects of the plan itself, allows the SA to report on the likely cumulative effects of the plan, which is another requirement of the SEA Regulations.

2.10 The SEA Regulations require an assessment of effects in relation to the following 'SEA topics': biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape and the inter-relationship between these. Baseline information was therefore collected in relation to the SEA topics as well as additional sustainability topics covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. As part of the preparation of this SA Report, the baseline information for Tonbridge and Malling Borough which was originally presented in the SA Scoping Report has been reviewed and updated. The updated baseline information for the borough is presented in Appendix C.

Identify key sustainability issues

2.11 The baseline information also allows the identification of existing sustainability issues, including problems as required by the SEA Regulations.

2.12 Key sustainability issues facing Tonbridge and Malling Borough were identified in the Scoping Report and are presented in Chapter 3 along with an analysis of their likely evolution without the Local Plan.

Develop the SA framework

2.13 Development of an SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan.

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

2.15 Some changes were made to the SA framework following consultation on the April 2025 SA Scoping Report. These changes are outlined below.

- The sub-objective "To provide, protect and enhance active travel routes, including Public Rights of Way networks" was added to SA objective 2: Services and facilities.
- The sub-objective "To protect and enhance habitats and wildlife corridors" under SA objective 5: Biodiversity and geodiversity was amended to read "To protect and enhance habitats and wildlife corridors, including on brownfield land".
- The sub-objective "To protect, conserve and enhance priority species and habitats, including those of conservation importance that contribute to reversing the trend of ecological decline" under SA objective 5: Biodiversity and geodiversity was amended to read "To protect, conserve and enhance protected species, including priority species, and habitats – including those of conservation importance that contribute to reversing the trend of ecological decline".
- The sub-objective "To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy" was added to SA objective 5: Biodiversity and geodiversity.

2.16 The current SA framework for the Tonbridge and Malling Local Plan is presented in Chapter 3.

Consult on the scope and level of detail of the SA

2.17 Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

2.18 The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) to be consulted “when deciding on the scope and level of detail of the information that must be included” in the SA Report. The scope and level of detail of the SA is governed by the SA framework. The consultation undertaken on the Scoping Report has therefore incorporated consultation with the statutory consultees on the SA framework. This consultation on the SA Scoping Report was undertaken between April and June 2025.

2.19 Appendix A lists the comments that were received on the scope of the SA during this period of consultation and describes how each one was addressed in the final SA Scoping Report. In light of the comments received, a number of amendments were made to the review of plans, policies and programmes, the baseline information, key sustainability issues and their likely evolution without the Local Plan, in addition to the SA framework. These amendments were reflected in the final SA Scoping Report and have been carried through into this current SA Report, which accompanies consultation on the Regulation 18 Draft Local Plan.

SA Stage B: Developing and refining options and assessing effects

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

2.21 In relation to the SA report, Part 3 of the SEA Regulations 12 (2) requires that:

The report must identify, describe and evaluate the likely significant effects on the environment of

- implementing the plan or programme; and

- reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.

2.22 Schedule 2 (h) of the SEA Regulations requires that the environmental report includes a description of:

An outline of the reasons for selecting the alternatives dealt with.

2.23 The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g. the NPPF) or site options that are unavailable or undeliverable.

2.24 The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal number of positive and negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability, other pieces of evidence and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

2.25 The consideration of reasonable alternatives has been a key focus of attention within the SA process. This section provides an overview of how policy and site options have been identified by TMBC, which ones are reasonable alternatives and therefore have been subject to SA, and how this appraisal work has fed into the development of the emerging Local Plan.

Spatial options

2.26 Eight spatial options have been subject to SA. The findings are presented in Chapter 4 of this SA Report.

- Option 1: To maximise growth in all locations within the borough.
- Option 2: To focus growth in and around sustainable settlements within the borough.

- Option 3: To focus growth in and around sustainable settlements within the borough but excluding any new large extensions of c. 800+ units to existing sustainable settlements (i.e. North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes, Hildenborough).
- Option 4: To focus growth in sustainable settlements and on large extensions to sustainable settlements of 800+ units North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes and Hildenborough.
- Option 5: To focus growth in and around sustainable locations outside of the National Landscapes.
- Option 6: To focus growth in and around sustainable locations outside of the Green Belt.
- Option 7: To focus growth in and around sustainable locations outside of the National Landscapes and outside of the Green Belt.
- Option 8: Within existing settlement confines.

2.27 TMBC has assessed various options for the quantum and distribution of growth during the development of the Local Plan to date. The Regulation 18 consultation (2022) considered five alternative spatial options:

- Option 1: Focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty.
- Option 2: Urban- Development focused on sites within (greenfield as well as previously-development land) as well as adjacent to defined urban settlements.
- Option 3: Urban and Rural Service Centres - Development focused on sites within (greenfield as well as PDL) as well as adjacent to defined urban and rural service centre settlements.
- Option 4: Distributed - Development focused on sites within (greenfield as well as PDL) as well as adjacent to defined urban, rural service centres and other rural settlements to support a range of communities.

- Option 5: New Settlement - Development focused on sites within (greenfield as well as PDL) existing defined urban, rural service centres and other rural settlements, plus a new settlement/s.

2.28 However, since this time, TMBC has been required to respond to the new NPPF which takes a different approach to Green Belt release as well as an increased objectively assessed housing needs, as per the Government's standard method. This has resulted in a need to review the spatial options for growth.

2.29 As part of this Regulation 18 stage, eight growth options have now been identified. The options test different yields and distributions of growth across the borough having regard to sites identified to the Council, areas of significant constraint, and the updated settlement hierarchy, in order to deliver growth in sustainable locations and reflect the aims and objectives of the Local Plan. These options have had regard to meeting the identified needs over the plan period. Although the identified need is 19,746 homes and 361,500 sqm employment floorspace from 2024-2042, once other sources of supply are factored in (including extant permissions and a windfall allowance), the Local Plan needs to allocate sufficient land for a minimum of 12,634 dwellings and 65,111 sqm (including 52,644 sqm of office floorspace).

2.30 A sequential approach was adopted to understand growth options, allowing the Council to firstly understand how much growth could be accommodated within existing settlements, then exploring other options outside of settlements and areas of significant constraint, as well as other locations where growth could take place in order to allow needs to be met.

Site options

2.31 Following the appraisal of the growth and spatial options outlined in Chapter 4, the Council's reasonable site options were appraised.

2.32 The Council has compiled a comprehensive list of sites for assessment through the Council's Land Availability Assessment (LAA). The sites have come from a range of sources including:

- Sites submitted through the Council's numerous Call for Sites exercises;
- Existing unimplemented allocated sites in the adopted Development Plan;
- Sites previously considered as part of the Strategic Land Availability Assessment (2018);

- Sites on the Council's brownfield register;
- Land in the Council's ownership;
- Public sector land; and/or
- Vacant and derelict buildings.

2.33 All site options received were subjected to the same evaluation process.

2.34 Sites were then subject to an initial sift and eliminated as unsuitable because they were:

- Too small to be allocated in the Local Plan – sites with capacity to accommodate less than 5 dwellings or 0.25ha of employment floorspace;
- Subject to planning permission (to avoid double counting housing supply);
- Under construction or built out;
- Sites with no access to the highway network; and/or
- Sites promoted for a use where no residential or employment development is proposed e.g. sites promoted for Biodiversity Net Gain, access to another site only, or other uses where an allocation for that land-use is not proposed for inclusion in the Local Plan.

2.35 At this stage, all sites not excluded by these criteria were taken forward for further assessment and were subjected to a detailed site suitability assessment considering their physical characteristics, land uses, setting in the landscape and historic environment, accessibility and other environmental constraints such as ecology. These sites were also subject to SA, as presented in Chapter 5.

SA Stage C: Preparing the SA Report

2.36 This SA Report describes the process that has been undertaken to date in carrying out the SA of the Tonbridge and Malling Local Plan. The Regulation 18 Draft Local Plan that is the subject of this SA Report contains a number of strategic policies and development management policies, in addition to potential site allocations.

2.37 Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where possible.

2.38 The SA findings are set out in Chapter 4, Chapter 5 and Chapter 6 of this SA Report along with recommendations for mitigating potential negative effects and maximising the potential benefits of the Local Plan.

SA Stage D: Consultation on the Local Plan and the SA Report

2.39 Appendix A presents the consultation comments received in relation to the SA Scoping Report produced in April 2025 (updated in June 2025 post-consultation).

2.40 TMBC is inviting comments on the Regulation 18 Draft Local Plan and this accompanying SA Report. These documents are being published on the Council's website for consultation between November 2025 and January 2026.

SA Stage E: Monitoring implementation of the Local Plan

2.41 Chapter 8 contains draft recommendations for monitoring the likely significant environmental, social and economic effects of implementing the Local Plan, which will be updated as appropriate at the next stage of the SA.

Appraisal methodology

2.42 The contents of the Regulation 18 Draft Local Plan have been appraised against the SA objectives in the SA framework (see Table 3.1 in Chapter 3), with symbols being attributed to each option to indicate their likely effects on each SA objective as shown in Table 2.1. Where a potential positive or negative effect is uncertain, a question mark was added to the relevant symbol (e.g. +? or -?) and the symbol was colour coded in line with the potential positive, negligible or negative effect (e.g. green, white, yellow, etc.).

2.43 The likely effects of options need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown in Table 2.1. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or

policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

Table 2.1: Key to symbols and colour coding used in the SA of the Tonbridge and Malling Local Plan

Symbol and colour code	Description
++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
++/-	Mixed significant positive and minor negative effects likely
--/+	Mixed significant negative and minor positive effects likely
+/-	Mixed minor positive and minor negative effects likely
++/--	Mixed significant positive and significant negative effects likely
?	Likely effect uncertain
N/A	Not applicable

The use of site assessment criteria and uncertainty

2.44 SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed sets of site assessment criteria were developed and applied. These were based on the criteria used in the Interim Sustainability Appraisal for the 2022 Regulation 18

Local Plan but have been subject to some amendments since then in light of updated baseline information.

2.45 The criteria applied relate specifically to each type of site option (i.e. residential, employment and mixed use). The site assessment criteria set out clear parameters within which certain SA effects would be identified, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The criteria are presented in Appendix D of this SA Report. They were applied through the use of a Geographical Information System (GIS).

Refinements to the site assessment criteria

2.46 A small number of changes were made to the site assessment criteria following consultation on the SA Scoping Report earlier in 2025. The changes were as follows:

- SA objective 5: Biodiversity and geodiversity now gives consideration to Priority Habitats.
- The reference to Ancient Woodland under SA objective 5: Biodiversity and geodiversity has been moved so that it is considered alongside locally designated sites, not internationally and nationally designated sites.
- SA objective 6: Landscape and townscape has been updated so that if a site is now within 1km (not 500m) of a National Landscape, a significant negative effect with uncertainty is identified.
- SA objective 9: Soils has been updated so that if a site comprises a mix of brownfield and greenfield land, mixed effects are identified.

2.47 Once the site assessment work had begun, SA objective 2: Services and facilities was updated as the Council amended and updated its settlement hierarchy following publication of the SA Scoping Report. The criteria were updated to reflect these changes.

Approach to appraisal of site allocation policies

2.48 Each reasonable alternative development site option has been appraised on its own merits on a 'policy-off' basis, i.e. based on existing conditions and without taking into account opportunities to mitigate potential negative effects by, for example, providing new social infrastructure, by development design that seeks to minimise effects, or by site layouts that avoid sensitive environmental

receptors within the site boundary. This serves to highlight potential effects on the environment and potential gaps in existing services, facilities and sustainable transport links. It also provides a more consistent basis for assessment than reliance on indicative site masterplans or offers of infrastructure provision that some site promoters may have made, because this information was not available for all site options. Consideration by the SA of any proposed site layouts would also be inappropriately detailed in light of the relatively high-level nature of a Local Plan. The findings of these policy-off appraisal are set out in Chapter 5.

2.49 Once the Local Plan site allocation policies were drafted, the effects identified in the initial appraisal of site options were reviewed to reflect the Local Plan's site-specific policy requirements (i.e. 'policy-on' appraisals). The SA findings for the site allocation policies are set out in Chapter 6. In addition, once a completed draft of the Local Plan had been produced, an assessment was carried out of the performance of the plan as a whole (see Chapter 7), referred to as the cumulative effects. This also took account of the mitigation offered by development management policies and regulatory mechanisms external to the Local Plan.

Difficulties and data limitations

2.50 Schedule 2 (8) of the SEA Regulations requires the environmental report to include:

A description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

2.51 A number of difficulties and limitations arose in the course of the SA as follows:

- There was a need to appraise a large number of site options consistently. In order to address this issue, detailed site assessment criteria relating to each of the SA objectives were developed and applied during the appraisal of site options (as described above).
- The site assessment criteria presented in Appendix D of this SA Report include a number of distance-based criteria used to estimate likely effects of site options. Research by the Chartered Institution of Highways and Transportation was used to identify these distances to various services

and facilities. Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater.

- Similarly, straight-line distances were used to define areas within which varying levels of harm to environmental receptors were assumed to exist. In reality, the risk of harmful effects will sometimes depend on non-linear pathways (such as watercourses for water pollution effects) and will depend on the particular vulnerabilities of specific receptors. Nevertheless, the assumptions used were judged proportionate to the level of detail of a Local Plan and were considered to provide a consistent basis for assessing all of the site options.
- Where site options are close to the borough boundary, the spatial analysis was potentially affected by the fact that some spatial data required for proximity-based assessments were not available for neighbouring districts/boroughs, or for part of them.
- The level of detail of the site options appraisal work was commensurate with the level of detail of the Local Plan document. As such, not every local characteristic could be investigated for each site option. For example, in relation to potential effects of the site options on biodiversity assets, it was necessary to base the identified effect on proximity to designated biodiversity sites only.
- The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about air quality.
- The available GIS data for the Agricultural Land Classification did not always distinguish between Grades 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land) agricultural land. This resulted in some uncertainty in the effects, as set out in the assumptions (see Appendix D).
- Bus service frequency is not covered by the site assessment criteria, due to the fact bus service frequency is subject to change on a regular basis and is not mapped spatially.
- Consideration is not given to the capacity of medical centres, as this data is not easily available.
- Residential sites that contain existing employment uses could result in the loss of these uses and therefore are shown to have minor negative effects in relation to SA objective 4. Whether a site contains an existing

employment use or not is determined by the information submitted in the Call for Sites form for that site. It is therefore acknowledged that some sites may contain existing businesses that have not been identified within the Call for Sites form.

- Small settlements, such as hamlets, do not have boundaries. Therefore, if a site is adjacent to a hamlet, it is not picked up as being located adjacent to a settlement but is instead identified as being located in the countryside. Sites located adjacent to small settlements in the countryside were in all cases identified as having an uncertain significant negative effect in relation to SA objective 6: Landscape and townscape. This is considered reasonable, given that development on the edge of smaller settlements may be more likely to have landscape impacts.
- With regard to the impact of development on the setting of a National Landscape, there is no set distance over which effects on setting may occur. The 1km applied is considered to be a reasonable threshold to indicate where there is particularly likelihood of effects occurring.

2.52 Additional evidence is expected to be produced as the Local Plan process advances and will be taken into account in the SA as appropriate.

Chapter 3

Sustainability context

3.1 Schedule 2 of the SEA Regulations requires:

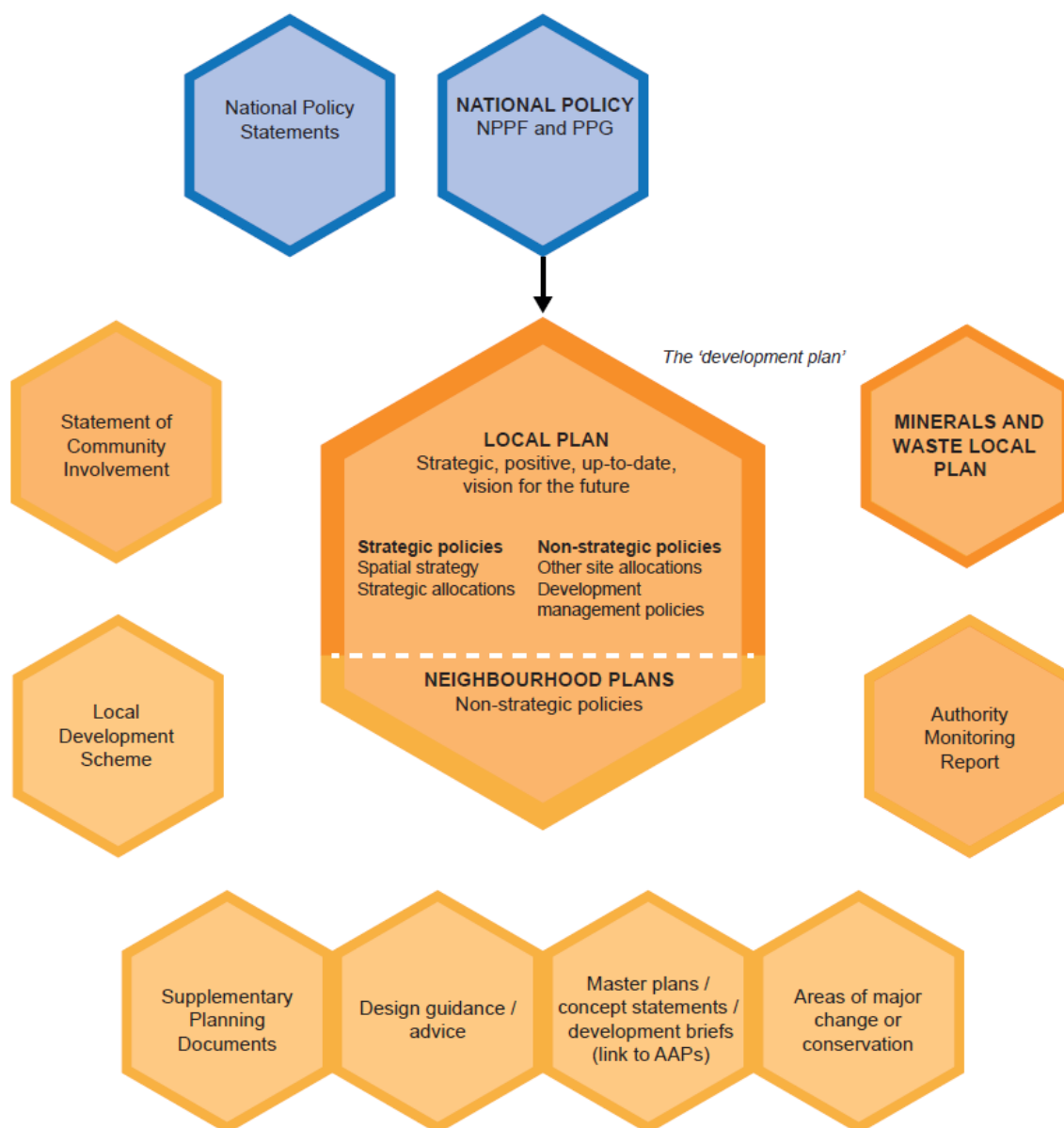
- An outline of the contents and main objectives of the plan or programme, and its relationship with other relevant plans or programmes.
- The environmental protection objectives established at international, Community or national level, which are relevant to the plan or programme and the way those objectives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

3.2 An outline of the 2025 Regulation 18 Draft Local Plan was provided in Chapter 1.

Relationship with other relevant plans or programmes

3.3 The Tonbridge and Malling Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown in Figure 3.1 below. The new Local Plan will eventually replace the adopted Core Strategy (2007), Development Land Allocations DPD (2008), Tonbridge Central Area Action Plan (2008) and Managing Development and the Environment DPD (2010). The Local Plan also comprises any ‘made’ Neighbourhood Plans [\[See reference 6\]](#) within the borough and is supported by other documents such as the Statement of Community Involvement, Local Development Scheme, Authority Monitoring Report and Supplementary Planning Documents, also shown in Figure 3.1.

Figure 3.1 Relationship between the Local Plan and other relevant plans and programmes



Policy context

3.4 The policy context in which the Tonbridge and Malling Local Plan is being prepared informs consideration of what constitutes reasonable alternative policy options for that document as well as the framework of sustainability objectives against which it will be appraised. It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to the Levelling-up and Regeneration Act, which sets out various

reforms to the planning system, including the replacement of the SA/SEA regime with 'Environmental Outcomes Reports'; replacement of the CIL process and much of the section 106 payments section with a new national infrastructure levy; a shared framework of National Development Management Policies, removing much of this detail from Local Plans; replacement of Supplementary Planning Documents with Supplementary Plans that carry more weight but would be subject to examination; repeal of the Duty to Cooperate; a duty on public bodies and infrastructure providers to assist the local plan-making process; a speeded up plan-making process (plans to be prepared and adopted within 30 months); a strengthened role for the 'national model design code'; replacement of Neighbourhood Plans with Neighbourhood Priorities Statements; removal of the current NPPF requirement to demonstrate a rolling five-year supply of housing land, provided that the local plan is up-to-date; and removal of the 'soundness test' for local plans to be 'justified'.

3.5 It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by the increasing number of local authorities, including TMBC, that have declared a climate emergency.

International

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

National

3.7 There is an extensive range of national plans, policies and programmes that are of relevance to the Tonbridge and Malling Local Plan and the SA process. A pragmatic and proportionate approach has been taken with regards to the identification of key national plans, policies and programmes, focusing on those that are of most relevance. A summary of the main objectives of the NPPF and PPG of relevance to the Local Plan and the SA is provided below. In addition, the main sustainability objectives of other national plans and programmes which are of most relevance to the Local Plan and SA are summarised in Appendix B.

The National Planning Policy Framework and Planning Practice Guidance

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

3.9 An updated version of the NPPF was published in December 2024. It includes a new standard method for assessing housing needs, which is much more ambitious than its predecessor. According to the new standard method, TMBC will need to deliver 1,090 dwellings per annum (it was previously 839 dwellings per annum).

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

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

- “an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to

meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

3.12 The new Local Plan must be consistent with the requirements of the NPPF, which states:

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

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

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

- a) homes (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

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

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

Environmental and social considerations

3.17 Climate change adaption and mitigation, energy efficiency and waste minimisation measures for new development including through the promotion of renewable energy schemes are also supported through the NPPF. One of the core planning principles is to "support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure." Furthermore, local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures.

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

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

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

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

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

the Kent and Medway Local Nature Recovery Strategy, which sets out the county's priorities for nature recovery and the recommended actions to deliver these.

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

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

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

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

3.27 Although Local Plans can no longer require levels of the Code for Sustainable Homes, they can promote the Home Quality Mark to support residents in understanding the quality and performance of new build homes and can also set targets for developers to provide for a given percentage of energy used by a new development to come from on-site renewable or low carbon technologies. Revisions were made to the Building Regulations 2022 [\[See reference 12\]](#), setting minimum energy efficiency standards which are

increasing the performance values of properties. From 15 June 2022, all new build homes are required to produce at least 31% less carbon emissions. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets. The UK Green Building Council has produced a resource pack which is designed to help local authorities improve the sustainability of new homes. The New Homes Policy Playbook [\[See reference 13\]](#) sets out minimum requirements for sustainability in new homes that local authorities should introduce, as well as proposed stretching requirements should local authorities wish to go further. For non-residential uses, BREEAM assessments can be used by local authorities to ensure buildings meet sustainability objectives.

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

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

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

3.31 The new Local Plan can seek to ensure the appropriate protection of soil quality, including best and most versatile agricultural land. Further to this, the Local Plan should ensure that new development does not conflict with current minerals operations, as well as long-term mineral resource plans. The SA process should inform the development of the new Local Plan by helping to identify alternatives which would avoid areas of highest soil quality and best and

most versatile agricultural land, as well as those which would promote the use of brownfield land.

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

Economic considerations

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

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

3.35 The new Local Plan should seek to maximise the potential benefits of nearby strategic growth, while at the same time ensuring the vitality and viability of smaller localised economies. Ensuring that services and facilities within the borough’s district and neighbourhood centres are maintained and enhanced is also important and will also provide support for local communities. The SA process can support the development of the new Local Plan to ensure that its policies are considerate of impacts on the economy in Tonbridge and Malling Borough. The process can also be used to demonstrate that impacts on the viability of Tonbridge Town Centre and other local centres have been considered.

3.36 The NPPF encourages local planning authorities to consider transport issues from the earliest stages of plan-making so that: opportunities to promote

sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

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

Other national plans, policies and programmes

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

Climate change adaption and mitigation, energy efficiency and waste minimisation

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

- Clean Energy Industries Sector Plan (2025)
- The Hydrogen Update to the Market (2025)
- The Onshore Wind Strategy (2025)

- The Clean Power 2030 Action Plan (2024)
- The Policy Statement on Onshore Wind (2024)
- State of the UK Climate (2024)
- Carbon Budget Delivery Plan (2023)
- Powering Up Britain (2023)
- The Net Zero Growth Plan (2023)
- The Environment Improvement Plan (2023)
- UK Climate Change Risk Assessment (2022)
- British Energy Security Strategy (2022)
- The Environment Act (2021)
- The Net Zero Strategy: Build Back Greener (2021)
- The Industrial Decarbonisation Strategy (2021)
- The Heat and Buildings Strategy (2021)
- The UK Hydrogen Strategy (2021)
- Energy Performance of Buildings Regulations (2021)
- The Waste Management Plan for England (2021)
- The Energy White Paper: Powering our Net Zero Future (2020)
- National Infrastructure Strategy: Fairer, Faster, Greener (2020)
- Decarbonising Transport: Setting the Challenge (2020)
- Sixth Carbon Budget (Climate Change Committee, 2020)
- Flood and Coastal Erosion Risk Management: Policy Statement (2020)
- The National Flood and Coastal Erosion Risk Management Strategy for England (2020)
- The Waste (Circular Economy) (Amendment) Regulations (2020)
- Net Zero – The UK’s Contribution to Stopping Global Warming (2019)
- The Flood and Water Management Act 2010 and The Flood and Water Regulations (2019)
- Climate Change Act (2008) and Climate Change Act 2009 (2050 Target Amendment) Order (2019)

- The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the Country Resilient to a Changing Climate (2018)
- Our Waste, Our Resources: A Strategy for England (2018)
- The Clean Growth Strategy (2017)
- National Planning Policy for Waste (NPPW) (2014)
- Waste Management Plan for England (2013)
- The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK (2012)
- The Promotion of the Use of Energy from Renewable Sources Regulations (2011)
- The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009)
- The UK Renewable Energy Strategy (2009)
- Planning and Energy Act (2008)

Implications for the Local Plan and SA

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

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

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

Health and well-being

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

- Planning Policy for Traveller Sites (2024)
- The Policy Statement on New Towns (2024)
- Levelling Up and Regeneration Act (2023)
- Green Infrastructure Framework (2023)
- Anti-Social Behaviour Action Plan (2023)
- Homes England Strategic Plan 2023-2028 (2023)
- White Paper Levelling Up the United Kingdom (2022)
- A Fairer Private Rented Sector White Paper (2022)
- National Design Guide (2021)
- The State of the Environment: Health, People and the Environment (2021)
- Build Back Better: Our Plan for Health and Social Care (2021)
- COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021)
- Using the Planning System to Promote Healthy Weight Environments (2020) Addendum (2021)
- The Charter for Social Housing Residents: Social Housing White Paper (2020)
- Public Health England, PHE Strategy 2020-2025 (2019)
- Homes England Strategic Plan 2018-2023 (2018)
- The Housing White Paper Fixing Our Broken Housing Market (2017)
- Planning Policy for Traveller Sites (2015)

- Technical Housing Standards – Nationally Described Space Standard (2015)
- Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013)
- Laying the Foundations: Housing Strategy for England (2011)
- Fair Society, Healthy Lives (2010)
- Healthy Lives, Healthy People: Our Strategy for Public Health in England (2010)
- Environmental Noise Regulations (2006)

Implications for the Local Plan and SA

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

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

Environment (biodiversity/geodiversity, landscape and soils)

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

- The Climate and Nature Bill (2024)
- The Environment Improvement Plan (2023)
- The Waste Prevention Programme for England: Maximising Resources, Minimising Waste (2023)
- 25 Year Environment Plan: Progress Reports (2023)
- Working with Nature (2022)
- Establishing the Best Available Techniques for the UK (UK BAT) (2022)
- The Environment Act (2021)
- 25 Year Environment Plan: Progress Reports (2020)
- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations (2019)
- A Green Future: Our 25 Year Plan to Improve the Environment (2018)
- Environmental Damage (Prevention and Remediation) Regulations (2015)
- Biodiversity Offsetting in England Green Paper (2013)
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (2011)
- Defra Right of Way Circular (01/09) (2011)
- Countryside and Rights of Way Act (2010)
- Safeguarding Our Soils – A Strategy for England (2009)
- England Biodiversity Strategy Climate Change Adaptation Principles (2008)
- Natural Environment and Rural Communities Act (2006)
- Wildlife and Countryside Act (1981) (as amended)
- National Parks and Access to the Countryside Act (1949)

Implications for the Local Plan and SA

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

It will be the role of the SA to test the policy options in terms of the effect they will have on biodiversity sites and habitats as well as valued landscapes. The effects of these options in relation to promoting the development of brownfield land and limiting the loss of valuable agricultural soils should also be appraised. The findings of the Habitats Regulations Assessment should inform the appraisal of the options where appropriate.

Historic environment

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

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

Implications for the Local Plan and SA

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

The SA should appraise options for the Local Plan in terms of the potential for effects on the historic environment. The SA will help identify which sites are more likely to have adverse effects on the historic environment, helping inform the selection of preferred sites. The Local Plan should seek to protect and enhance the historic environment.

Water and air

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

- The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025)
- Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023)
- Air quality strategy for England (2023)
- Managing Water Abstraction (2021)
- Environment Act (2021)
- National Chalk Streams Strategy Chalk Stream Strategy (2021)
- Meeting Our Future Water Needs: A National Framework for Water Resources (2020)
- Clean Air Strategy (2019)
- The Road to Zero (2018)
- Our Waste, Our Resources: A Strategy for England (2018)
- Environmental Noise Regulations (2018)
- Water Supply (Water Quality) Regulations 2018

- Water Environment (Water Framework Directive) (England and Wales) Regulations (2017)
- UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017)
- Drought Response: Our Framework for England (2017)
- Managing Water Abstraction (2016)
- Environmental Permitting Regulations (2016)
- Nitrate Pollution Prevention Regulations (2015)
- Water White Paper (2012)
- National Policy Statement for Waste Water (2012)
- Air Quality Standards Regulations (2010)
- Flood and Water Management Act (2010)
- Groundwater (England and Wales) Regulations (2009)
- Flood Risk Regulations (2009)
- Future Water: The Government's Water Strategy for England (2008)
- Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007)
- Urban Waste Water Treatment Regulations (2003)
- Environmental Protection Act (1990)

Implications for the Local Plan and SA

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

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

Economic growth

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

- Infrastructure: A 10 Year Strategy (2025)
- The UK's Modern Industrial Strategy (2025)
- The Plan for Change (2024)
- The Levelling Up and Regeneration Act (2023)
- The White Paper Levelling Up the United Kingdom (2022)
- The Growth Plan (2022)
- Build Back Better: Our Plan for Growth (2021)
- Agricultural Transition Plan 2021-2024 (2020)
- Agriculture Act (2020)
- UK Industrial Strategy: Building a Britain Fit for the Future (2018)
- LEP Network response to the Industrial Strategy Green Paper Consultation (2017)
- National Infrastructure Delivery Plan 2016-2021 (2016)

Implications for the Local Plan and SA

The Local Plan should allocate land to support the projected level of economic growth required over the plan period. Local planning authorities should consider setting out approaches in Local Plan policies to promote sustainable economic and employment growth to benefit all members of the community and to reduce disparity in the plan area. This should include support for the infrastructure required for the economy to function successfully. Employment sites should be located to enable local people to be able to access the new employment opportunities. Local Plan policies may also seek to promote the viability of town and village centres.

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

Transport

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

- Future of Transport: Supporting Rural Transport Innovation (2023)
- Levelling Up the United Kingdom White Paper (2022)
- Cycling and Walking Investment Strategy Report to Parliament (2022)
- Future of Freight Plan (2022)
- Decarbonising Transport: A Better, Greener Britain (2021)
- The Environment Act (2021)
- Decarbonising Transport: Setting the Challenge (2020)
- Jet Zero Strategy Delivering Net Zero Aviation by 2050 (2020)
- The Road to Zero (2018)
- Transport Investment Strategy (2017)
- Highways England Sustainable Development Strategy and Action Plan (2017)
- Airports: The Government's View Summary Document – Moving Britain Ahead (2016)
- Door to Door: A Strategy for Improving Sustainable Transport Integration (2013)

Implications for the Local Plan and SA

The potential for reducing the need to travel, limiting congestion and associated benefits for air quality and climate change as well as public health should inform the preparation of the policies for the Local Plan and its site allocations. The Local Plan should also encourage walking and cycling as alternative modes of transport by providing safe and attractive

walking and cycling infrastructure, as well as recognise the multiple benefits they bring in terms of physical and mental health, reducing carbon emissions and reducing air pollution. Furthermore, the selection of site options for development should be informed by issues such as the potential for access to new and existing public transport nodes and active transport routes and specific highways capacity issues. The selection of individual site options should also be informed by their proximity to essential services and facilities which is likely to reduce the need for residents to regularly travel long distances.

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

Sub-national

3.46 Below the national level there are further plans and programmes which are relevance to the Local Plan and SA process. These plans and programmes sit mostly at the county and borough level, and further details are provided in Appendix B.

County

- Kent County Council, The Kent Minerals and Waste Local Plan 2024–2039 (2025)
- Commissioning Plan for Education Provision in Kent 2025-2029 (2025)
- Kent County Council Local Transport Plan 5: Striking the Balance 2024-2037 (2024)
- Kent Local Flood Risk Management Strategy 2024-2034 (2024)
- Kent Drug and Alcohol Strategy 2023-2028 (2022)
- Framing Kent's Future 2022-2026 (2022)
- Kent Adult Social Care Strategy 2022-2027 (2022)
- Kent Nature Partnership Biodiversity Strategy 2020-2045 (2020)
- Kent and Medway Energy and Low Emissions Strategy Implementation Plan 2020-2023 (2020)

- Kent County Council Active Travel Strategy 2018/19 (2018)
- Kent County Council Growth and Infrastructure Framework (2018)
- Kent Environment Strategy (2016)
- Kent Joint Health and Wellbeing Strategy 2014-2021 (2014)
- Draft Kent and Medway Local Nature Recovery Strategy (2025)

Borough

- Tonbridge and Malling Heritage Strategy (2025)
- Tonbridge and Malling Green and Blue Infrastructure Strategy (2024)
- Annual Service Delivery Plan 2025/26 (2025)
- Tonbridge and Malling Community Safety Partnership Plan 2024-2025 (2024)
- Tonbridge and Malling Borough Council Corporate Strategy 2023-2027 (2023)
- Tonbridge and Malling Borough Council Economic Development Strategy 2023-2027 (2023)
- Tonbridge and Malling Borough Council Air Quality Action Plan (2022)
- Tonbridge and Malling Borough Council: Borough Economic Recovery Strategy 2021-2023 (2021)
- Tonbridge & Malling Borough Council Housing Delivery Test Action Plan (2021)
- Tonbridge and Malling Borough Council, Climate Change Strategy 2020-2030 (2020)
- Tonbridge and Malling Borough Council Contaminated Land Inspection Strategy (2016)
- Tonbridge and Malling Cycling Strategy 2014-2019 (2014)
- Tonbridge and Malling Borough Council, Managing Development and the Environment (2010)
- Tonbridge and Malling Borough Council, Local Development Framework – Tonbridge Central Area Action Plan (2008)

- Tonbridge and Malling Borough Council, Local Development Framework – Development Land Allocations (2008)
- Tonbridge and Malling Borough Council Affordable Housing Supplementary Planning Document (2008)
- Tonbridge and Malling Borough Council, Local Development Framework – Core Strategy (Adopted 2007)

Other

- Medway Joint Local Health and Wellbeing Strategy 2024-2028 (2024)
- High Weald National Landscape AONB Management Plan 2024-2029 (2024)
- Medway River Basin Catchment Drainage and Wastewater Management Plan (2022)
- The Kent Downs National Landscape Management Plan 2021-2026 (2021)
- Tonbridge and Tunbridge Wells – Tonbridge Urban Transport Delivery Strategy (2007)

Implications for the Local Plan

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

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

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

The provision of an appropriate level of housing will help address issues of inequality in relation to housing in the plan area and support economic

growth. The provision of new housing should be considerate of local needs, including the needs of Gypsies, Travellers and Travelling Showpeople. The new Local Plan should support economic growth within Tonbridge and Malling Borough, including supporting the rural economy and infrastructure requirements. This economic growth should align with the aims in Kent.

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

Surrounding development plans

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

- Maidstone
- Tunbridge Wells
- Sevenoaks
- Gravesham
- Medway

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

3.49 As the SA progresses, consideration will be given to the extent to which the content of these other plans could lead to in-combination effects with the Tonbridge and Malling Local Plan, for example as a result of any large-scale

new development being proposed in close proximity to the borough that could result in effects across district/borough boundaries.

Baseline information

3.50 Baseline information provides the context for assessing the sustainability of proposals in the Local Plan and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. Baseline data must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

3.51 Schedule 2 of the SEA Regulations requires that the environmental report includes descriptions of:

- The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.
- The environmental characteristics of areas likely to be significantly affected.

3.52 Schedule 2 (6) of the SEA Regulations requires the likely significant effects of the plan on the environment to be assessed in relation to: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape and the inter-relationship between these. As an integrated SA and SEA is being carried out, baseline information relating to other 'sustainability' topics has also been included, for example, information about housing, social inclusiveness, transport, energy, waste and economic growth.

3.53 Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Local Plan to understand the likely future sustainability conditions in the absence of the local plan.

3.54 The baseline information for Tonbridge and Malling Borough is presented in Appendix C.

3.55 SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Relevant baseline information will be updated during the SA process as and when data are published.

Key sustainability issues and likely evolution without the Local Plan

3.56 Analysis of the baseline information has enabled a number of key sustainability issues facing Tonbridge and Malling Borough to be identified. The key sustainability issues and consideration of how these issues might develop over time if the new Local Plan is not implemented are outlined below.

3.57 Key sustainability issues for Tonbridge and Malling Borough were previously identified through the SA Scoping process in 2022. These issues were considered to be a starting point when preparing the updated SA Scoping Report but were fully reviewed and updated in light of the updated policy review and latest baseline information. The key sustainability issues have again been reviewed as part of the preparation of this SA report, to take into account updates to the baseline information.

3.58 It is also a requirement of the SEA Regulations that consideration be given to the likely evolution of the environment in the plan area (in this case Tonbridge and Malling Borough) if the new Local Plan was not to be implemented.

3.59 The information collated shows that, in general, the current trends in relation to the various environmental, social and economic issues affecting Tonbridge and Malling would be more likely to continue without implementation of the new Local Plan, although the policies in the adopted Tonbridge and Malling Local Plan would still go some way towards addressing many of the issues. In most cases, the new Local Plan offers opportunities to affect existing trends directly and strongly in a positive way, through an up-to-date plan which reflects the requirements of the current NPPF. Without the new Local Plan in place speculative development would be more likely to prevail and this would make it difficult to secure infrastructure and the range of homes and jobs needed to support the Borough, of a good quality that conserves and enhances the landscape and townscape.

Climate

Key sustainability issue

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

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

3.62 Projected population growth has the potential to increase greenhouse gas emissions from a variety of lifestyle choices such as private vehicle use. However, there is potential to minimise private vehicle use through the siting of development and providing a mix of uses, in addition to encouraging walking, cycling and public transport use.

3.63 Tonbridge and Malling Borough Council declared a climate emergency in July 2019. Actions and objectives to reduce the borough's carbon emissions will therefore need to be taken into account in the new Local Plan. New development could reduce building emissions through the appropriate selection of sustainable building design and materials.

Likely evolution of the issue without the Local Plan

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

3.65 This could include the use of nature-based solutions for climate adaptation, for example the use of green roofs and other ecosystem-based approaches to increase resilience to climate change. These solutions will help to manage the effects of the changing climate and associated weather events and also promote biodiversity. Without the Local Plan, the impacts of climate change would likely be more significant in the Borough.

3.66 The new Local Plan offers an opportunity to contribute further to mitigate the potential effects of any flooding and help the borough's communities adapt to the increased likelihood of significant weather events in the future. Without the Local Plan, flooding events are more likely to have adverse impacts in the future.

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

Landscape character

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

3.69 The new Local Plan offers an opportunity to ensure that sensitive landscapes are protected and enhanced as appropriate and that development is designed to take account of the variation in character and sensitivity across the borough, through the inclusion of up-to-date policies which reflect the most recent evidence. Without the new Local Plan, this issue is less likely to be addressed as it is more likely that piecemeal and ad hoc developments would come forward.

Ecology and biodiversity and geodiversity

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

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

Water environment

Key sustainability issue

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

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

Likely evolution of the issue without the Local Plan

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

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

3.76 Without the Local Plan, the extent of people and assets at risk from flooding is likely to be higher.

Land

Key sustainability issue

3.77 Development on brownfield land or land at risk of contamination could cause the release of contaminants into groundwater or surface waters. Contaminants could impact on environmental receptors such as nature conservation sites or watercourses. Most of the agricultural land in Tonbridge

and Malling Borough is classified as Grades 2 and 3 agricultural land. Development could potentially affect this good quality agricultural land, reducing the amount of land in the borough available for agriculture.

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

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

Likely evolution of the issue without the Local Plan

3.80 The new Local Plan provides an opportunity to ensure that land is not compromised by future growth by directing development away from contaminated land and that appropriate measures are required to ensure risks of contaminants are minimised. The new Local Plan provides the opportunity to prioritise the development of brownfield land over greenfield land and poorer agricultural land over best and most versatile agricultural land. In the absence of the new Local Plan, high quality agricultural land may be more likely to be lost to piecemeal development.

3.81 The new Local Plan provides an opportunity to manage development pressures on designated sites such as RIGS, ensuring their protection. Without the new Local Plan, adverse impacts on these sites may be more likely to result from piecemeal development.

Historic environment

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

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

Air quality

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

3.85 The new Local Plan provides an opportunity to plan development and supporting infrastructure sustainably to minimise deterioration in air quality without inhibiting the need for growth, for example by steering development away from known air quality hot spots. Without the new Local Plan, this issue will therefore be less well addressed and poor air quality is likely to remain an issue in parts of the Borough. However, even without the new Local Plan, the increased uptake of electric vehicles is likely to provide some mitigation.

Population and human health

Key sustainability issue

3.86 A growing population will create a substantial need for further housing (including affordable housing), education facilities, and improved social, leisure and transportation infrastructure. This growing population will place increased demand on a range of community services and facilities and also increase competition for jobs. Pressure also arises from a higher population density as more people will demand services within a smaller area.

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

Likely evolution of the issue without the Local Plan

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

3.89 The new Local Plan offers an opportunity to reduce the gap between the most and least deprived by providing for, or encouraging access to, healthcare facilities, well-designed and located development, and opportunities to exercise – all of which will support health and well-being. In the absence of the new Local Plan, existing shortfalls and disparities in the provision of services and facilities are more likely to remain.

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

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

Key sustainability issue

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

Likely evolution of the issue without the Local Plan

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

Key sustainability issue

3.94 Tonbridge and Malling Borough has a range of amenity and natural green spaces, but some areas of the Borough – particularly north of Wateringbury and the central areas of Tonbridge – lack green space provision.

Likely evolution of the issue without the Local Plan

3.95 Without the Local Plan, the decline in provision is likely to continue, increasing pressure on existing green spaces and limiting opportunities for outdoor recreation, particularly for young people. The new Local Plan therefore

offers the opportunity to address these gaps by protecting and enhancing green spaces, ensuring that new developments contribute to accessible outdoor areas, and improve play facilities to meet national standards.

Economy and employment

Key sustainability issue

3.96 Employment levels within the borough are higher than the national average and weekly pay for full-time workers in the borough is greater than the South East region and Great Britain as a whole. However, residents commute out of the borough to attain highly skilled employment, while others commute into the borough to fulfil lower skilled jobs.

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

Likely evolution of the issue without the Local Plan

3.98 The new Local Plan can help support a strong economy, growth and new businesses by identifying the employment sites and infrastructure required to deliver new jobs. Without the new Local Plan, current patterns of commuting are likely to continue, with the associated congestion issues.

Key sustainability issues

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

Likely evolution of the issue without the Local Plan

3.100 Without the Local Plan, there is a risk that skills gaps could widen, limiting economic opportunities and social mobility within the borough. The new Local Plan presents an opportunity to support skills development and lifelong learning by encouraging investment in local education and training facilities. It will also provide new employment opportunities which may deliver work-based training and skills development.

Material assets

Key sustainability issue

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

3.102 The borough has good Public Rights of Way (PRoW) networks which help facilitate access to the countryside and open space. However, the predicted increase in population will require the provision of open space to increase accordingly.

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

Likely evolution of the issue without the Local Plan

3.104 The new Local Plan could help reduce greater pressure on the transport network by supporting the use of sustainable modes of travel by ensuring development is supported by sustainable infrastructure and that amenities, services and jobs are located within a reasonable walking and cycling distance. Without the new Local Plan, pressure on the road network is likely to increase as development may be speculative and not planned with access to sustainable transport infrastructure in mind.

3.105 The new Local Plan provides opportunities for open space and recreation provision, increasing the number of opportunities available to promote healthy lifestyles, social cohesion and benefits for mental health. Without the Local Plan, this issue would be less well-addressed.

Waste and minerals

Key sustainability issue

3.106 Recycling rates have increased across the borough and will need to continue to increase in alignment with Kent County Council goals. Future

population increase is likely to place increasing pressure on waste management systems and facilities.

Likely evolution of the issue without the Local Plan

3.107 The new Local Plan provides the opportunity to support the waste hierarchy including sustainable and well-designed development, requiring sustainable demolition and construction practices and the provision of space and infrastructure to support recycling. Therefore, while recycling rates are already increasing, this issue is likely to be less well addressed in its absence.

The SA framework

3.108 As described in Chapter 2, the SA framework that was used for the Interim Sustainability Appraisal for the 2022 Regulation 18 Local Plan was reviewed in the June 2025 SA Scoping Report and has been subject to some amendments in light of updated baseline information, key sustainability issues and a review of international, national and local policy objectives.

3.109 The context for the appraisal of options for the Local Plan against each of the SA objectives is set by the sub-objectives below. These provide a guide for the appraisal of options, identifying issues relating to the SA objective that should be considered where relevant. Given the large number of issues relating to each SA objective, it is not possible to list all those that are related and relevant and therefore the decision-making criteria should not be considered to be prescriptive or exhaustive. In effect the criteria act as a starting point for the identification of effects and the appraisal work considers wider issues as appropriate.

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

3.111 The SA framework is initially presented as text, in line with accessibility regulations. At the end of this chapter, the SA framework is presented in table format which some may find easier to interpret.

3.112 Since the SA framework was presented in the SA Scoping Report, reference to minerals has been removed from SA objective 9 as this was already covered under SA objective 13, in order to remove duplication.

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

Sub-objectives

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

Relevant SEA topics

- Population
- Human health

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

Sub-objectives

- To improve access to leisure facilities.
- To maintain and improve access to essential services and facilities.
- To promote the use of more sustainable modes of transport.
- To encourage walking, cycling and the use of public transport.

- To provide, protect and enhance active travel routes, including Public Rights of Way networks.

Relevant SEA topics

- Population
- Human health
- Material assets

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

Sub-objectives

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

Relevant SEA topics

- Population

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

Sub-objectives

- To support businesses to grow, expand and diversify, particularly in rural areas.
- To increase local employment opportunities for all and the provision of higher value jobs, reducing levels of unemployment.

- To support business performance, growth and resilience.
- To protect existing and provide new employment floorspace.
- To ensure that supporting infrastructure is provided to encourage economic growth.
- To support the needs of small and medium business enterprises.
- To support the vitality and viability of town centres.

Relevant SEA topics

- Population

SA objective 5: To protect and enhance biodiversity and geodiversity

Sub-objectives

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

Relevant SEA topics

- Biodiversity
- Flora and fauna

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

Sub-objectives

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

Relevant SEA topics

- Landscape
- Cultural heritage

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

Sub-objectives

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

Relevant SEA topics

- Cultural heritage

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

Sub-objectives

- To protect water resources such as those used for the supply of water and abstraction.
- To reduce the risk of flooding to existing communities and ensure no new developments are at risk.
- To improve water quality including contributing towards achievement of relevant River Basin Management Plan aims.
- To minimise water consumption, such as through high standards of water efficiency.
- To ensure infrastructure is adequate to support water supply and sewer connections.
- To ensure that wastewater treatment infrastructure is available.

Relevant SEA topics

- Water
- Population

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

Sub-objectives

- To reduce the amount of derelict, underused and vacant land.
- To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible.
- To protect valued soils, soil functions and protect and enhance soil quality and prevent soil pollution.

- To avoid development of 'best and most versatile' agricultural land.
- To prevent the sterilisation of mineral deposits.
- To prevent land contamination and promote the remediation of contaminated land.

Relevant SEA topics

- Soil
- Material assets

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

Sub-objectives

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

Relevant SEA topics

- Climate
- Human health
- Material assets

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

Sub-objectives

- To contribute to climate change adaptation.
- To ensure that developments are designed and constructed to assist in climate change adaptation i.e. reduce overheating, urban cooling, etc.
- To encourage best practice measures for managing flood risk such as SuDS or other flood alleviation measures.
- To reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change.
- To avoid development in areas at risk of flooding or in adjacent areas that would increase flood risk.
- To ensure that nature-based solutions are maximised such as green walls, tree-planting, natural flood management solutions, etc.
- To ensure that there is suitable energy infrastructure capacity.

Relevant SEA topics

- Climate
- Water
- Biodiversity
- Flora and fauna

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

Sub-objectives

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

Relevant SEA topics

- Air
- Climate
- Biodiversity
- Flora and fauna
- Landscape

SA objective 13: To protect material assets and minimise waste

Sub-objectives

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

Relevant SEA topics

- Material Assets

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

Sub-objectives

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

Relevant SEA topics

- Population

Table 3.1: Sustainability Appraisal framework in table format

SA objective	Sub-objective	SEA topic
SA objective 1: To improve human health and well-being	To reduce health inequalities amongst different groups in the community.	Population Human health
	To improve access to health and social care services.	
	To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, leisure facilities, children's and teenage play areas and access to green spaces.	
	To maintain low crime levels.	
	To reduce the fear of crime.	
	To reduce levels of anti-social behaviour.	
	To encourage safety by design.	

SA objective	Sub-objective	SEA topic
	To promote healthy lifestyles through connecting people with nature and promoting high standards of green infrastructure.	
	To encourage local food growing and healthy eating including allotments and community gardens.	
	To accommodate the needs of an ageing population.	
SA objective 2: To improve equality and access to community facilities and services	To improve access to leisure facilities.	Population
	To maintain and improve access to essential services and facilities.	Human health
	To promote the use of more sustainable modes of transport.	Material assets
	To encourage walking, cycling and the use of public transport.	
	To provide, protect and enhance active travel routes, including Public Rights of Way networks.	

SA objective	Sub-objective	SEA topic
SA objective 3: To ensure access to educational facilities and support skills and training development for all age groups and all sectors of society	To maintain and increase levels of participation in education for all members of local communities	Population
	To improve the provision of education and training facilities.	
	To improve access to and involvement in higher education	
	To improve qualifications and skills of young people and adults	
SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic inclusion across the borough	To support businesses to grow, expand and diversify, particularly in rural areas	Population
	To increase local employment opportunities for all and the provision of higher value jobs, reducing levels of unemployment.	
	To support business performance, growth and resilience.	
	To protect existing and provide new employment floorspace.	
	To ensure that supporting infrastructure is provided to encourage economic growth.	

SA objective	Sub-objective	SEA topic
	To support the needs of small and medium business enterprises.	
	To support the vitality and viability of town centres	
SA objective 5: To protect and enhance biodiversity and geodiversity	To protect and enhance designated sites of nature conservation importance and designated sites for geodiversity.	Biodiversity Flora and fauna
	To protect and enhance habitats and wildlife corridors, including on brownfield land.	
	To provide opportunities for people to access wildlife and open green spaces.	
	To increase biodiversity net gain.	
	To protect, conserve and enhance protected species, including priority species, and habitats – including those of conservation importance that contribute to reversing the trend of ecological decline.	
	To protect, enhance and expand ecological networks and their interconnectivity.	
	To protect irreplaceable habitats.	

SA objective	Sub-objective	SEA topic
	To ensure that development follows the biodiversity mitigation hierarchy of avoid, minimise, remediate, compensate.	
	To protect and enhance green and blue infrastructure.	
	To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy.	
SA objective 6: To protect and enhance the borough's landscape and townscape character and quality	To protect and enhance landscape character and quality, particularly landscapes of high quality and value.	Landscape Cultural heritage
	To protect and enhance townscape character and quality.	
	To protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.	
	To conserve and enhance National Landscapes within the borough and their settings.	

SA objective	Sub-objective	SEA topic
	To promote high quality design in the context of the landscape and townscape, enhancing local distinctiveness.	
	To protect and enhance settlement identities including their setting and character.	
SA objective 7: To protect, conserve and enhance heritage and cultural assets	To protect, conserve and enhance heritage assets and their settings, including sites and features of archaeological value.	Cultural heritage
	To protect and enhance the historic character of the landscape/townscape.	
SA objective 8: To protect and enhance the water environment and reduce flood risk	To protect water resources such as those used for the supply of water and abstraction.	Water Population
	To reduce the risk of flooding to existing communities and ensure no new developments are at risk.	
	To improve water quality including contributing towards achievement of relevant River Basin Management Plan aims.	
	To minimise water consumption, such as through high standards of water efficiency.	

SA objective	Sub-objective	SEA topic
	To ensure infrastructure is adequate to support water supply and sewer connections.	
	To ensure that wastewater treatment infrastructure is available.	
SA objective 9: To conserve and enhance soil resources, use land efficiently and guard against land contamination	To reduce the amount of derelict, underused and vacant land.	Soil Material assets
	To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible.	
	To protect valued soils, soil functions and protect and enhance soil quality and prevent soil pollution.	
	To avoid development of 'best and most versatile' agricultural land.	
	To prevent the sterilisation of mineral deposits.	
	To prevent land contamination and promote the remediation of contaminated land.	
SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency	To reduce and minimise greenhouse gas emissions.	Climate

SA objective	Sub-objective	SEA topic
and contribute to becoming a net zero carbon borough	To contribute towards becoming a carbon neutral Council and borough by 2030.	Human health
	To increase energy efficiency.	Material assets
	To support the transition from fossil fuels and promote the use of decentralised and low carbon energy.	
	To promote the use of sustainable modes of transport such as walking, wheeling and the use of public transport.	
	To reduce use of the private car.	
	To encourage the production of energy from waste.	
	To promote sustainable methods of design and construction including reducing embodied carbon emissions.	
	To support the provision of and uptake of electric charging infrastructure.	
	To nurture development of a green economy.	
	To support businesses in becoming net zero.	

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

SA objective	Sub-objective	SEA topic
SA objective 12: To reduce levels of and exposure to noise, light and air pollution	To protect and improve local air quality.	Air
	To minimise increases in traffic and congestion.	Climate
	To minimise development in areas exposed to poor air quality (e.g. AQMAs).	Biodiversity
	To minimise noise generation in close proximity of sensitive receptors.	Flora and fauna
	To minimise light pollution.	Landscape
SA objective 13: To protect material assets and minimise waste	To ensure sustainable use of natural resources.	Material assets
	To reduce the demand for raw materials.	
	To promote the re-use of aggregates and the use of sustainable/local materials in construction.	
	To increase the proportion of waste recycling and reuse.	
	To reduce the production of waste.	
	To reduce the proportion of waste generated and waste that goes to landfill.	
	To contribute to housing supply.	

SA objective	Sub-objective	SEA topic
SA objective 14: To provide a suitable supply of high quality housing including an approximate mix of sizes, types and tenures to meet local needs	To contribute to meeting local housing needs (affordable, specialist housing) to meet the needs of all.	Population
	To provide an appropriate mix of sizes, types and tenures of housing.	
	To promote housing that is of high quality.	
	To reduce or prevent homelessness.	
	To provide pitches for Gypsies and Travellers.	

Chapter 4

Sustainability Appraisal findings for the spatial growth options

4.1 TMBC identified eight spatial growth options. Each option describes the amount of potential residential and employment development that could be delivered in the plan period, subject to further evidence, and its potential distribution. It should be noted that these options were developed early in the plan-making process, prior to all evidence about the suitability and deliverability of the site options being available. The spatial growth options should therefore be viewed as a snapshot in time and the yields indicated early in the plan-making process may well be much higher than the actual yields under each option, once the emerging evidence is taken into account.

- Spatial option 1: To maximise growth in all locations within the borough (Figure 4.1).
 - Residential: c.19,000 dwellings
 - Employment: c. 475,000sqm
- Spatial option 2: To focus growth in and around sustainable settlements within the borough (Figure 4.2).
 - Residential: c. 19,000 dwellings
 - Employment: c. 450,000sqm
- Spatial option 3: To focus growth in and around sustainable settlements within the borough, but excluding any new large extensions of c. 800+ units to existing sustainable settlements (i.e. North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes, Hildenborough) (Figure 4.3).
 - Residential: c. 6,500 dwellings
 - Employment: c. 430,000sqm
- Spatial option 4: To focus growth in sustainable settlements and on large extensions to sustainable settlements of 800+ units North of Kings Hill, West Tonbridge, Borough Green, East Malling Research, Holborough, North Tonbridge, Aylesford Lakes and Hildenborough (Figure 4.4Figure 4.5).
 - Residential: c. 13,500 dwellings
 - Employment: c. 99,000sqm

- Spatial option 5: To focus growth in and around sustainable locations outside of the National Landscapes (Figure 4.5).
 - Residential: c. 16,000 dwellings
 - Employment: c. 383,000sqm
- Spatial option 6: To focus growth in and around sustainable locations outside of the Green Belt (Figure 4.6).
 - Residential: c. 5,000 dwellings
 - Employment: c. 237,000sqm
- Spatial option 7: To focus growth in and around sustainable locations outside of the National Landscapes and outside of the Green Belt (Figure 4.7).
 - Residential: c. 5,000 dwellings
 - Employment: c. 237,400sqm
- Spatial options 8: Within existing settlement confines (Figure 4.8).
 - Residential: c. 1,200 dwellings
 - Employment: c. 79,000sqm

4.2 The likely effects of the eight options are presented in Table 4.1 overleaf and are described below the table. Maps illustrating the distribution of growth under each option can be found at the end of this chapter.

Table 4.1: SA findings for the spatial growth options

SA objective	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8
SA1: Health and well-being	+/-?	+/-?	+	++	+/-?	+/-	+/-	+
SA2: Services and facilities	++/-?	++/-?	+	++/-?	++/-?	+	+	+
SA3: Education	+/-?	++/-?	+	++/-?	++/-?	+	+	+
SA4: Economic growth	++	++	+	+/-	++	+/-	+/-	--/+
SA5: Biodiversity and geodiversity	--	--	--	--	--	-	-	-
SA6: Landscape and townscape	--	--	-	--	--/+	++/-	++/-	0
SA7: Historic environment	--	--	--	--	--	-	-	0
SA8: Water	--	--	-	--	--	-	-	-
SA9: Soils	--	--	+/-	++/--	--	+/-	+/-	+/-
SA10: Climate change mitigation	+/-	+/-	+/-	+/-	+/-	+	+	+
SA11: Climate change adaptation	--	--	-	--	--	-	-	+/-
SA12: Pollution	--/+	++/--	++/-	++/-	++/--	+/-	+/-	0

SA objective	SO1	SO2	SO3	SO4	SO5	SO6	SO7	SO8
SA13: Waste	--	--	-	--	--	-	-	0
SA14: Housing	++	++	--	++	++	--	--	--

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

4.3 The level and distribution of growth within the borough can influence the extent to which people are able to lead more active lifestyles through active travel. Growth in the borough also has the potential to support the delivery of new healthcare facilities or put additional pressure on existing facilities if new provision is not made. In Tonbridge and Malling, existing GP surgeries are largely located across the north, east and south of the borough, near major settlements like Snodland, West Malling and Tonbridge. Additionally, smaller settlements in the east, which form part of the Medway Gap, such as Leybourne and Aylesford, also benefit from access to existing GP surgeries. The borough's largely rural character supports a dense network of Public Rights of Way (PRoW), including Pilgrims Way and the North Downs Way, which run through the borough. There are two country parks (Haysden and Leybourne Lakes) located on the western outskirts of Tonbridge and in Aylesford, respectively, as well as Trosley Country Park just outside of the borough.

4.4 Spatial Options 1, 2 and 5 would deliver significant growth across the borough, particularly near larger settlements, and urban areas such as Tonbridge, the Medway Gap and Snodland. Option 1 distributes residential and employment growth across all locations within the borough, at settlements across all levels of the settlement hierarchy, while option 2 focuses growth specifically at sustainable settlements in the borough. Option 5 focuses development at sustainable locations outside of National Landscapes. Under these options, the larger towns, which provide the easiest access to existing healthcare facilities and open spaces, including PRoWs and green spaces, would see the highest level of growth. Additionally, option 1 would support limited growth within settlements in rural areas, which might help support the viability of health services in these areas. However, while the high level of residential growth that would be delivered in the larger settlements could support the viability of existing healthcare facilities in those areas, it could also put pressure on existing services, risking those services becoming overcrowded and the potential for there to not be enough healthcare facilities to meet the demand. It is recognised that new provision will be made through S106 agreements, although there may be a lag before they are operational. In addition, the dispersed nature of growth proposed in option 1 may make it more challenging to deliver increased healthcare capacity as a result of development. Therefore, mixed minor positive and minor negative effects are expected for options 1, 2 and 5 in relation to this objective. The effects are uncertain at this stage, as there is no evidence indicating a particular threshold at which new

development could result in health services becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development.

4.5 The growth proposed under option 4 would take place in sustainable settlements and through extensions to sustainable settlements at locations such as Tonbridge, Kings Hill, Borough Green and Holborough. Development in these locations would have good access to existing open spaces and would support the viability of existing and new services and facilities within or near to these settlements, including healthcare facilities, by focusing large-scale development here. A high level of growth is proposed within the large and medium-sized settlements, where residents are already more likely to benefit from access to existing healthcare provision, open space and active travel opportunities. Additionally, large-scale extensions to sustainable settlements could include healthcare facilities as part of development. Therefore, a significant positive effect is likely for option 4 against this objective. The effect is uncertain at this stage, as there is no evidence indicating a particular threshold at which new development could result in existing health services becoming overloaded, nor whether adequate new provision would be secured as part of development to avoid new deficiencies being created.

4.6 Spatial Option 3 focuses residential growth in and around sustainable settlements within the borough and excludes any large-scale extensions to those areas. Employment growth is also focused in and around sustainable settlements, including Aylesford and Tonbridge. This will ensure that new development is located where there is a wide range of key services and facilities, helping to provide residents with convenient access to everyday needs, such as healthcare and open space, and workers with access to open space. These services can support health and well-being and encourage active lifestyles through walking and cycling. Additionally, this option proposes a smaller amount of development compared to the previously described options and so is likely to place less additional demand on existing healthcare infrastructure. However, the limited amount of development means that fewer contributions will be made towards existing (or the provision of new) healthcare facilities and open space. Overall, option 3 is likely to have a minor rather than significant positive effect against this objective.

4.7 While Spatial Options 6 and 7 are described separately, they are effectively identical in spatial terms, as the areas designated as National Landscapes within the borough are almost entirely contained within the Green Belt. For this reason, both options would deliver the same level of growth. Both options distribute residential and employment growth to a limited number of locations

primarily around the settlements of Aylesford, West Malling, East Malling, Eccles, Wouldham and the Medway Gap, most of which benefit from access to healthcare and all of which benefit from access to open space. However, mixed minor positive and minor negative effects are expected for both spatial options in relation to this objective, as while the reduced housing yield proposed under both options may reduce increases in pressure on healthcare infrastructure, it may also constrain opportunities to support new service provision or improve access in areas of existing need.

4.8 Spatial Option 8 would deliver very limited residential and employment growth, which would be focused within existing settlement confines. A significant increase in demand for existing services is therefore less likely compared to other options, although fewer contributions will be made towards existing (or the provision of new) healthcare facilities and open space under this option. This small-scale growth is limited to the north-east and south of the borough. These areas offer easy access to services and facilities such as healthcare and open space which can have a positive impact on health and well-being and may offer good opportunities for walking and cycling. Therefore, a minor positive effect is expected for option 8 in relation to this objective.

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

4.9 The main town within the borough is Tonbridge, including Hilden Park. Tonbridge is a Principal Service Centre, reflecting its high level of facilities, services and employment opportunities. There are two other Principal Service Centres: the Medway Gap and Walderslade. There are four Service Centres in the borough: Snodland, Borough Green, West Malling and Kings Hill. These settlements are located in the north-east of the borough, with the exception of Borough Green which is located in the north-west. They form the main settlements after the Principal Service Centres and also provide a wide range of facilities, services and local employment opportunities.

4.10 Spatial Options 1, 2, 4 and 5 involve higher levels of residential development, directing growth towards the urban areas, particularly the built-up areas of Tonbridge, Borough Green, Snodland, Kings Hill and the Medway Gap. These settlements are located towards the top of the settlement hierarchy and therefore already provide a broad range of services and facilities. These options also direct a large amount of development to Hildenborough, which although it is a Primary Village, provides essential services and facilities to the surrounding rural populations. This is likely to provide residents within new developments

with opportunities to satisfy everyday needs, and also to reduce the need to travel long distances for facilities and services. Further to this, option 4 supports large extensions of over 800 units at sustainable settlements and so will likely facilitate delivery of additional school provision to meet increased demand. This could also apply to the other options that involve large-scale development. Significant positive effects are therefore identified for options 1, 2, 4 and 5 in relation to this objective. However, under option 1 growth would be distributed across all locations within the borough, which will include other rural settlements, such as Addington. Development in these lower-tier settlements may result in some residents having poorer access to key services and facilities. Additionally, the high level of growth focused in the borough's larger settlements under options 1, 2, 4 and 5 may place increased pressure on existing services and facilities, particularly if infrastructure improvements are not delivered alongside housing. Therefore, minor negative effects are also identified for these options in relation to this objective. These effects are uncertain at this stage as there is no evidence indicating a particular threshold at which new development could result in services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development.

4.11 Spatial Option 3 also focuses growth in and around sustainable settlements, excluding any large-scale extensions to these settlements. This will help to ensure that new development is located where there is a wide range of key services and facilities, helping to provide residents with convenient access to everyday needs. While the overall scale of growth is limited, option 3 supports accessibility to services and facilities and will help to maintain the viability of existing services. Therefore, a minor positive effect is identified for this option in relation to SA objective 2.

4.12 Spatial Options 6, 7 and 8 would all deliver lower levels of housing growth, with development distributed to a limited number of areas, or confined to existing settlement boundaries. Options 6 and 7 direct growth primarily to the east of the borough around Aylesford, West Malling, East Malling, Kings Hill and the Medway Gap. These areas benefit from relatively good access to key services and facilities. Option 8 focuses very limited growth within the confines of existing settlements in the east and south of the borough, where accessibility to services is generally good. As such, these three options are all likely to have minor positive effects in relation to this objective.

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

4.13 Primary schools in Tonbridge and Malling are primarily located around the larger settlements, including Snodland, West Malling, Kings Hill and Aylesford in the north and north-east, Tonbridge in the south, and Borough Green in the west. In contrast, access to secondary schools is more limited but largely focused in the north and north-east, and in south around Tonbridge.

4.14 Spatial Option 1 seeks to maximise residential growth in all locations within the borough. This includes more rural areas where access to education, particularly secondary schools, is more limited and could place additional pressure on existing local primary schools. However, it also includes larger settlements and built-up areas, namely Tonbridge, Snodland, Kings Hill and the Medway Gap where many schools are located. Spatial Options 2, 4 and 5 direct high levels of growth to sustainable settlements. These settlements provide good access to both primary and secondary schools, which will help ensure that residents within new developments can access education facilities within a relatively short distance. However, the high levels of growth proposed under these options may also place additional pressure on existing school capacity, depending on the extent of new provision also made. Options 1, 2, 4 and 5 support large extensions of over 800 units at sustainable settlements and may facilitate delivery of additional school provision to meet increased demand. Overall, option 1 is expected to have a mixed minor positive and minor negative effects in relation to this objective, with some uncertainty as there is no evidence at this stage indicating a particular threshold at which new development could result in educational facilities becoming overloaded. The effects would also depend largely on the extent of new provision that is made alongside new housing development. Options 2, 4 and 5 are expected to have mixed significant positive and minor negative effects with uncertainty, as they support large extensions of 800+ units which could support the delivery of education facilities as part of development and would not involve the same development in less sustainable settlements as option 1.

4.15 Spatial Option 3 focuses growth in and around sustainable settlements such as Tonbridge, Hildenborough, Borough Green, Aylesford, East Malling and West Malling, which benefit from good access to both existing primary schools. However, the option excludes large-scale extensions to major settlements, for example Kings Hill and Tonbridge. The smaller scale of growth is less likely to

place pressure on existing school facilities compared to the higher growth options (1, 2, 4 and 5). As such, option 3 is expected to have a minor positive effect in relation to the objective, although its more limited scale may also reduce opportunities for delivering new services and facilities such as schools, as part of development.

4.16 Spatial Options 6 and 7 focus limited residential growth to the east of the borough, focused around Aylesford, Kings Hill and East Malling. These areas have relatively good access to educational provision, with primary schools situated within the settlements and also across the Medway Gap. However, given the modest scale of growth proposed, opportunities to deliver or enhance education infrastructure are likely to be limited. Overall, a minor positive effect is expected for both options in relation to the SA objective.

4.17 Option 8 distributes development within existing settlement confines, focusing only on small-scale growth in a limited number of settlements. These settlements have access to educational provision, with several primary and secondary schools located in Tonbridge, and a relatively high number of primary schools but limited secondary provision in Aylesford and Kings Hill. The restricted scale of development under this option is unlikely to place significant pressure on existing educational facilities. Therefore, a minor positive effect is expected in relation to this SA objective.

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

4.18 Tonbridge and Malling Borough Council has a gross employment need of 60,500sqm office floorspace and 301,000sqm industrial floorspace, so 361,500sqm in total, with a net need of 65,111 sqm (including 52,644 sqm of office floorspace).

4.19 Spatial Options 1, 2, 3 and 5 would deliver employment growth in the north-east of the borough, particularly around the Medway Gap, which is well-served by rail connections and bus services. The concentration of employment land near existing and proposed residential areas, such as East Malling and Aylesford, would help to reduce commuting distances and support sustainable travel patterns. The close proximity of new housing to employment opportunities is likely to enhance access to jobs for new residents. Additionally, prioritising

residential growth in settlements such as Tonbridge, Snodland the Medway Gap will shorten commute times to employment centres, encouraging the use of sustainable transport options, particularly trains and buses. Significant positive effects are identified for options 1, 2 and 5 in relation to the SA objective for the reasons outlined above. Option 3 is expected to have a minor positive effect against this objective, as it proposes a smaller amount of residential development compared to the other options, which may result in less balance between the provision of homes and jobs. However, it does deliver the employment floorspace needed.

4.20 Spatial Option 4 would deliver a smaller amount of employment growth, which it directs to Tonbridge. As a major town, Tonbridge benefits from good public transport accessibility, including a railway station and numerous bus stops. As a result, new housing will be located close to existing employment areas, helping to reduce commuting distances and support more sustainable transport patterns. However, the overall scale of employment growth is modest, which may reduce flexibility to meet long-term housing and employment needs. As such, the option is expected to have a mixed minor positive and minor negative effect in relation to the SA objective.

4.21 Spatial Options 6 and 7 focus employment growth in the east of the borough, in relation to East Malling and Aylesford, and Tonbridge in the south. The options also support limited residential growth in relation to the same locations. While this will help to support employment opportunities for residents in new developments, the options may be too constrained in their focus on growth in the east of the borough. This may result in a lack of employment provision in other parts of the borough, including rural areas. As such, mixed minor positive and minor negative effects are expected for options 6 and 7 in relation to the SA objective.

4.22 Option 8 distributes residential and employment development within existing settlement confines, focusing only on small-scale growth in a limited number of settlements. While this may support local employment opportunities for residents, particularly in settlements with good transport links, this option will restrict land coming forward to meet employment needs in much of the borough. As such, a mixed significant negative and minor positive effect is expected for option 8 in relation to the SA objective.

SA objective 5: To protect and enhance biodiversity and geodiversity

4.23 Tonbridge and Malling is highly constrained in relation to sensitive biodiversity assets, with two Special Areas of Conservation (SAC) located within the north of the borough, 11 Sites of Special Scientific Interest (SSSI), and 46 Local Wildlife Sites (LWSs), distributed throughout the borough. The borough also contains numerous habitats and species of principal importance (Priority Habitats), which include deciduous woodland, lowland dry acid grassland and traditional orchards. With regard to regionally important geological and geomorphological sites (RIGS), there are nine RIGS within the borough. These are primarily located in the northern areas of Wealden Greensand and the North Downs.

4.24 Options 1, 2, 3, 4 and 5 would involve considerable land take and could therefore have adverse effects on biodiversity and geodiversity. For example, options 1, 2, 4 and 5 direct a considerable amount of development towards the north-east of the borough where internationally designated sites are present including North Downs Woodlands SAC and Peters Pit SAC. As such, there is potential for negative effects on sensitive environmental sites located within the north-east of the borough, including the Holborough to Burham Marshes SSSI, the Wouldham to Detling Escarpment SSSI, the North Downs Woodland SAC and Wagon's Pit RIGS and SSSI. There are also numerous Priority Habitats and LWSs concentrated in the east of the borough. Significant negative effects are therefore identified for these options in relation to this SA objective. It is important to note, however, that these options also direct residential and employment growth to the south-west of the borough, particularly around Hildenborough and Tonbridge, which are less environmentally constrained compared to the north-east. These areas contain fewer designated biodiversity sites, reducing the likelihood of significant impacts on biodiversity and geodiversity.

4.25 Spatial Options 6 and 7 focus growth in and around sustainable locations situated outside of the Green Belt and National Landscapes. Subsequently, these options concentrate development in the eastern part of the borough, particularly around West Malling and East Malling, as well as Aylesford. While West Malling and East Malling are generally less environmentally constrained, there are a number of nationally designated sites present within close proximity of these settlements, including Oaken Wood SSSI, and Holborough to Burham Marshes SSSI. There are also a number of SACs in the north of the borough, specifically North Downs Woodlands SAC and Peters Pit SAC, which

development would be in close proximity to. Growth would also be within close proximity to Ditton Court Quarry RIGS and Hays Depot Aylesford RIGS, although these are not considered major constraints, as no development is proposed directly on them. A number of LWSs, SSSIs, SACs, and Priority Habitats are scattered across the borough but mostly within the north. However, the overall scale of development under options 6 and 7 is more limited compared to other options, which reduces the risk of extensive impacts on biodiversity compared to the higher growth options. However, it is noted that the areas where most growth would take place under these two options is within close proximity of many of the sensitive biodiversity assets. As such, minor negative effects are expected overall in relation to this SA objective.

4.26 Spatial Option 8 proposes relatively little residential and employment growth, distributed within the settlement confines. The option allocates small levels of growth to Aylesford, Kings Hill, Leybourne and Tonbridge. Some residential and employment sites would be located close to the Wagon's Pit RIGS, although this is not considered a major constraint, as no development is proposed directly on the RIGS. Development would also be situated near several LWSs, including South of Leigh LWS and Ditton Court Quarry LWS, as well as adjacent to Priority Habitats and areas of Ancient Woodland. The overall scale of development under option 8 is very limited compared to other options, reducing the risk of widespread impacts on biodiversity. As a result, a minor negative effect is expected in relation to the SA objective.

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

4.27 Tonbridge and Malling Borough is largely rural in nature, reflected in its extensive areas of grassland, arable land and Ancient Woodland, which together make up a significant part of the borough's landscape. This rural character is also evident by the fact that approximately 71.1% of the borough falls within the Metropolitan Green Belt. The Kent Downs National Landscape is situated along the northern, eastern and western boundaries of the borough, while the High Weald National Landscape covers a small area along the southern edge of the borough.

4.28 Spatial Options 1 and 2 support the highest quantum of growth, particularly residential growth. This includes some development in the north-west of the borough, in relation to Wrotham and Ightham, which are within the Kent Downs National Landscape. Growth within the Kent Downs National Landscape

presents a risk to the National Landscape. Additionally, the Metropolitan Green Belt covers extensive areas of the borough. Options 1, 2, 4 and 5 propose substantial development within the Green Belt, in accordance with the NPPF which states that where it is necessary to release Green Belt land, exceptional circumstances must be demonstrated. Such development in the Green Belt has the potential to compromise the openness and distinct identity of rural and semi-rural areas and increase the risk of settlement coalescence. As such, options 1, 2, 4 and 5 are expected to have significant negative effects in relation to the SA objective. For option 5 this is mixed with a minor positive effect as it directs development outside of the National Landscape.

4.29 Spatial Option 3 allocates considerably less residential development than the higher-growth options (1, 2, 4 and 5), resulting in a more limited expansion of sustainable settlements. However, the option allocates a substantial amount of land for employment development. Some residential and employment growth is directed to the outskirts of Borough Green, which partially lies within the Kent Downs National Landscape and its setting. Additionally, some development is proposed in the south-west of the borough, particularly around Hildenborough, the outskirts of which lie within the Metropolitan Green Belt. While the overall scale of development under this option is relatively modest, the location of growth in National Landscapes and their settings may have adverse landscape impacts. A minor negative effect is therefore expected in relation to this SA objective.

4.30 Spatial Options 6 and 7 focus growth in and around sustainable locations outside of the Green Belt and the National Landscapes. They seek to deliver limited growth concentrated in the east of the borough. Options 6 and 7 are therefore expected to have significant positive effects in relation to SA objective 6, due to their specific focus on ensuring development is located outside of the Green Belt and National Landscapes. However, these options are also expected to have minor negative effects, as although they avoid National Landscapes, some development may take place in the settings of National Landscapes. Further to this, the large amount of development centred around the east of the borough, particularly in relation to Kings Hill and Aylesford, is likely to have some adverse effects on the local landscape character and townscape in these areas.

4.31 Spatial Option 8 promotes very limited residential and employment growth, focusing small-scale development within Aylesford, Kings Hill, Leybourne and Tonbridge. These areas lie outside National Landscapes and the Metropolitan Green Belt. Given the small scale of change, any effects on the Green Belt and

landscape character are likely to be limited. As such, a negligible effect is identified for option 8 in relation to the SA objective.

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

4.32 Tonbridge and Malling Borough has a wealth of heritage assets, with 60 conservation areas scattered throughout urban and rural settlements, over 1,000 listed buildings, 25 scheduled monuments largely concentrated in the north of the borough and five registered parks and gardens. There are also four heritage assets identified at risk, in Snodland, Tonbridge, Aylesford and Offham.

4.33 Given the scale and distribution of development proposed under all spatial options, some degree of adverse impact on the designated and non-designated heritage assets and their settings may be possible. Significant negative effects are identified for the higher and medium-growth options (1, 2, 3, 4 and 5) in relation to this objective. In particular, large-scale growth is directed to Aylesford, where development could affect the setting of the conservation areas there, in addition to the setting of the scheduled monument (Romano-British villa, Anglo-Saxon cemetery and associated remains) next to Eccles, which has been identified as at risk. Growth is also distributed to East Malling, Hadlow and Ightham which contain conservation areas, and Tonbridge, which could affect the setting of another scheduled monument (Tower Bank) also identified as at risk.

4.34 Options 6 and 7 are expected to have minor negative effects in relation to this objective, as they propose limited growth. This limited scale of development is likely to reduce adverse impacts on heritage assets, particularly outside of the east of the borough where most development is concentrated under these options. Similarly, option 8 supports very limited development in existing settlements. Given the small scale of change, a negligible effect is identified for option 8 in relation to this objective.

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

4.35 Tonbridge and Malling Borough is located within the Medway Management Catchment, and more specifically the Medway Middle Operational Catchment. The borough contains an extensive network of watercourses, including the River Medway, which flows south-west through the borough to Tonbridge, and

its tributaries such as the River Bourne, Hilden Brook and numerous smaller streams. There are also important groundwater resources, with Source Protection Zones (SPZs) particularly concentrated around Aylesford, the south of Snodland, Borough Green and Tonbridge which help supply public drinking water. However, these areas are sensitive to contamination and pollution. Flood risk in the borough is greatest along the River Medway and its tributaries, with areas of Tonbridge and East Peckham in the south, and the Aylesford and Snodland in the north, falling within Flood Zone 3. Surface water flooding also poses a significant risk across the borough, alongside the threat of fluvial flooding.

4.36 Spatial Options 1, 2, 4 and 5 focus significant residential and employment growth to the north of the borough, around the Medway Gap and Snodland. These areas are adjacent to the River Medway and its tributaries, where there is a high probability of flooding from rivers and the sea. Additionally, growth is directed to the south of the borough, around Hildenborough and Tonbridge, which also contain some areas that fall within Flood Zone 3, due to their association with the River Medway and its tributaries, particularly the River Bourne. These areas are also at risk from surface water flooding. Additionally, much of the development proposed under option 3 is concentrated in the eastern central parts of the borough, where some areas are at risk of flooding due to their proximity to the River Medway. However, some areas, such as West Malling and Kings Hill, are comparatively less affected by flooding constraints. SPZs 2 and 3 are present in the north-east of the borough, particularly around East Malling and Snodland, where groundwater is abstracted for public water supply. SPZ1 is also located to the north of the borough, around Wrotham and Wrotham Heath, offering the highest level of protection. Given the extent and locations of growth, significant negative effects are identified for options 1, 2, 4 and 5 in relation to the SA objective, while a minor negative effect is identified for option 3 due to its more dispersed pattern of growth and relatively moderate scale of residential development.

4.37 Options 6 and 7 propose more limited growth concentrated primarily in the north-east of the borough, near Aylesford, in addition to Tonbridge – areas that similarly face significant flood risk, including proximity to the River Medway floodplain and areas at risk of surface water flooding. However, some growth is also distributed to West Malling, which is comparatively less constrained by flood risk. As such, minor negative effects are expected for options 6 and 7 in relation to the SA objective.

4.38 Spatial Option 8 distributes limited growth to the east and south of the borough, specifically Aylesford, Kings Hill, Leybourne and Tonbridge. Aylesford

and Tonbridge contain areas that fall within Flood Zones 2 and 3, making them vulnerable to flood risk. SPZs 2 and 3 are also concentrated around the east of the borough, particularly in relation to Aylesford, and also to the south, around Tonbridge. In contrast, growth areas in Kings Hill are less susceptible to flooding. Therefore, a minor negative effect is expected for option 8 in relation to the SA objective.

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

4.39 Much of Tonbridge and Malling Borough comprises Grade 3 agricultural land, although it is unknown exactly how much of this land comprises Grade 3a (classified as high quality) and 3b (not classed as high quality) agricultural land. There are also areas of Grade 1 agricultural land in the central areas of the borough, and substantial areas of Grade 2 agricultural land in the north-east and east of the borough.

4.40 Growth under all the options will intersect with areas of Grade 3, Grade 2 and Grade 1 agricultural land, particularly in relation to options 1, 2, 4 and 5, which comprise the highest growth options. Therefore, significant negative effects are identified for Spatial Options 1, 2, 4 and 5 in relation to this SA objective, while minor negative effects are identified for Spatial Options 3, 6, 7 and 8. Spatial Options 3, 6, 7 and 8 are also expected to have minor positive effects relation to SA objective 9, as they distribute a considerable amount of development to brownfield land, particularly in larger urban areas within the borough. Also, these options propose less development overall compared to the other options, thereby reducing the scale of potential land take and associated impacts on soil quality. For option 4, a significant positive effect is also identified, as it is a high growth option and distributes around half of this growth to brownfield land.

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

4.41 The impacts of new growth in the borough relating to the need to travel, encouraging modal shift and reducing congestion will largely depend on the

location of new development in relation to sustainable transport links, services and facilities, and employment land. Tonbridge and Malling is well-connected in relation to public transport, with nine railway stations in the borough, as well as two additional stations along the borough boundary. There are three main railway lines that pass through the borough: the Maidstone Line, the Medway Valley line and the South Eastern Main Line, providing access to London, Sevenoaks, Maidstone, Strood, Aylesford, Ashford, Dover, Ramsgate via Canterbury West and Hastings via Tunbridge Wells. Stations in Tonbridge and Malling on the Maidstone Line, include West Malling and East Malling, while on the Medway Valley Line, stations include Snodland, Aylesford and New Hythe. The borough also benefits from regular bus services, although less so in the rural areas, as well as services connecting the borough to neighbouring towns. Bus stops are distributed throughout the borough, with large concentrations around larger settlements, including Tonbridge, Snodland and the Medway Gap. There is also good cycling infrastructure within the borough, with a cycle route linking Tonbridge and Penshurst which forms part of the National Cycle Network. However, car dependency in Tonbridge and Malling Borough is high, with a higher percentage of individuals (47.4%) who travel to work by car than the national average (44.5%). This reflects the borough's well-connected road network, which comprises various key routes, including the A20, M20, A21, A227, A228, M2, A25, A26, A229 and M26. These roads connect the borough to wider transport networks including the M25 motorway and channel ports.

4.42 Spatial Options 1, 2 and 5 direct a considerable proportion of residential and employment growth to the north-east of the borough, particularly around Snodland, an area well-served by rail connections and frequent bus services. Option 4 focuses a considerable proportion of residential growth in the same area. The concentration of employment land near existing and proposed residential areas, such as West Malling, East Malling, Snodland and Aylesford, will help to reduce commuting distances and support sustainable travel patterns. This will reduce the need to travel via car to reach certain places, helping reduce greenhouse gas emissions through reduced fuel consumption and trip generation. These options are therefore likely to have minor positive effects in relation to the SA objective. These effects are mixed with minor negative effects for the reasons outlined below. Options 2, 4 and 5 propose high levels of residential and/or employment growth, which could increase the number of cars on the road and contribute to increased traffic congestion and associated emissions, potentially offsetting some of the benefits of concentrating development in more sustainable locations. Option 1 seeks to maximise growth in all locations within the borough. It proposes residential growth in more rural locations in the borough, including Ryarsh and Wrotham

Heath, which have limited access to public transport and so could result in a higher reliance on private vehicles.

4.43 Spatial Option 3 proposes lower levels of residential growth than the higher growth options (1, 2 and 5), focusing residential development in and around sustainable settlements, including Aylesford, Hildenborough and Borough Green. This approach will help to reduce reliance on private vehicles, as residents will have good access to active travel options, which could encourage modal shift. Residential development would also be located within close proximity of both existing and proposed employment areas, helping to reduce commuting distances and support more sustainable transport patterns. The option proposes a considerable amount of employment development, distributed in and around sustainable settlements, particularly in the Medway Gap. Although this will ensure that residents have good access to employment opportunities via active travel options, it may also increase the number of cars on the road due to the level of employment growth. As such, a mixed minor positive and minor negative effect is expected for the option in relation to the SA objective.

4.44 Spatial Options 6 and 7 promote growth within the most sustainable locations, particularly in the north-east of the borough including at West Malling and East Malling, where development is more likely to be located close to public transport and employment opportunities. This is likely to reduce reliance of private vehicles and encourage the use of public transport, which will help to decrease transport-related emissions. These options are therefore expected to have minor positive effects in relation to this SA objective.

4.45 Option 8 distributes residential and employment development within existing settlement confines, focusing only on small-scale growth in a limited number of settlements. The selected settlements, namely Aylesford, Kings Hill, Leybourne and Tonbridge, which benefit from good access to public transport, particularly bus services, will help to support the use of sustainable modes of transport such as walking and the use of public transport. A minor positive effect is expected for option 8 in relation to the SA objective.

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

4.46 Should climate change predictions be realised, there is the potential for significant adverse effects on the borough's infrastructure, public health, built

environment and the natural environment. These impacts will largely depend on the location of new growth in relation to sensitive areas of the borough, particularly in light of flood risk, noting that flooding from increased rainfall and more intense storm events may lead to significant adverse impacts on utility, residential, industrial and transport infrastructure. However, the general distribution of growth will not have a considerable influence on climate change adaptation, as this will be predominantly shaped by the policies in the Local Plan.

4.47 Spatial Options 1, 2, 4 and 5 would focus significant residential and employment growth in the northern parts of the borough, including the Medway Gap and Snodland, as well as parts of the south near Hildenborough and Tonbridge. This concentration of growth could increase the vulnerability of new development to flooding events, particularly as climate change is expected to increase the frequency and severity of such events over the plan period, particularly towards the end of the plan period. Consequently, these options are likely to have significant negative effects in relation to this SA objective.

4.48 Spatial Option 3 seeks to focus growth on sustainable settlements, excluding any new large extensions, which creates a more dispersed pattern of growth, avoiding very large-scale development in areas at risk of flooding. Additionally, areas like West Malling are less flood-prone and offer less vulnerable locations for development. As such, option 3 is expected to result in minor negative effects for the SA objective due to the remaining presence of flood risk, but the dispersed nature of growth will help mitigate vulnerability.

4.49 Options 6 and 7 propose more limited growth in the north-east of the borough, particularly near Aylesford, and also in the south at Tonbridge, areas that similarly face flood risk. However, some growth is also distributed to West Malling, which is comparatively less constrained by flood risk. Given the extent and locations of growth, minor negative effects expected for options 6 and 7 in relation to the SA objective.

4.50 Option 8 proposes the lowest growth levels, concentrating development within existing settlement boundaries, including locations such as Aylesford, Kings Hill, Leybourne and Tonbridge. Although some parts of Aylesford and Tonbridge fall within areas at risk of flooding, growth is limited in scale, and some settlements, including Kings Hill, are less susceptible to flooding. The focus on smaller-scale development within existing urban areas, reduces vulnerability to climate change impacts. As a result, option 8 is likely to have a mixed minor positive and minor negative effect in relation to the SA objective.

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

4.51 There are five Air Quality Management Areas (AQMAs) within Tonbridge and Malling Borough. Three of these AQMAs are located in the east of the borough, in Aylesford, Larkfield and Watlingbury. The other two are located in Tonbridge and Borough Green. They have been declared as a result of exceeding the national air quality objective for NO₂ (an annual mean concentration of 40µg/m³). Since this time all of the AQMAs (with the exception of Watlingbury) have met the criteria for revocation. Increased pressure from development can result in an increase in light and noise pollution, with impacts on the tranquillity – the effects of which are particularly felt in National Landscapes. Additionally, Tonbridge and Malling Borough's road network faces pressures as a result of congestion and delays at junctions, including within the built-up areas of Tonbridge, Leybourne, Ditton and Aylesford. This can contribute towards air and noise pollution. Proposed future growth within the borough will likely contribute further towards these challenges, although the shift to electric vehicles will help mitigate these effects.

4.52 Spatial Options 2 and 5 distribute residential and employment growth to the most sustainable locations in the borough, particularly in the north-east of the borough and within the settlements of Tonbridge and Borough Green, where access to public transport is generally good. This may help reduce reliance on the private car and associated noise and air pollution. However, the locations in which growth would be distributed under these two options also contain AQMAs. Therefore, supporting growth in these locations could exacerbate existing air quality issues. Additionally, some development under these options will be located adjacent to the Kent Downs National Landscape, such as Snodland and Borough Green. Considerable development is likely to have adverse effects on components of the natural beauty of the National Landscape, particularly dark skies and tranquillity, due to increased light pollution. Spatial Option 1 seeks to maximise growth in all locations within the borough, distributing the highest amount of growth out of all the options, focusing this on numerous settlements, including the larger settlements of Holborough, Snodland, Aylesford, Borough Green and Tonbridge. The considerable growth proposed under Spatial Option 1 could lead to additional traffic congestion on routes across Tonbridge and Malling (not just key routes), contributing towards a deterioration in local air quality and exacerbating air quality issues in the AQMAs, as well as contributing to increased light and noise pollution. In particular, the concentration of development around Holborough, Snodland and Borough Green, areas located adjacent to the Kent Downs

National Landscape, is likely to have adverse effects on its natural beauty. This includes harm to tranquillity and dark skies due to increased light pollution, as well as additional noise from traffic and activity. Overall, Spatial Options 2 and 5 are expected to have mixed significant positive and significant negative effects in relation to this objective. Spatial Option 1 is expected to have a mixed significant negative and minor positive effect in relation to this objective, as growth will be across numerous settlements – some of which are not sustainable.

4.53 Like Spatial Options 2 and 5, options 3 and 4 also focus growth in sustainable settlements. Option 4 also focuses growth on large extensions to sustainable settlements including Borough Green, Holborough and Tonbridge. These two options (particularly option 3) propose a lower overall scale of development compared to the higher growth options of 1, 2 and 5. The lower scale of growth may help to limit congestion and traffic increases, particularly when combined with the focus on settlements that already benefit from access to public transport and local services. However, many of the proposed growth areas are within close proximity to the AQMAs. Additionally, some growth under all of these options would be distributed to the north of the borough, adjacent to the Kent Downs National Landscape, which could affect the tranquillity and dark skies of the landscape, through increased light and noise pollution. As such, options 3 and 4 are expected to have mixed significant positive and minor negative effects in relation to this objective.

4.54 Spatial Options 6 and 7 would deliver limited growth within the most sustainable locations outside of the National Landscapes and Green Belt – particularly in the east of the borough at Aylesford, West Malling and East Malling, where development is more likely to be located close to public transport, services and facilities, and employment opportunities. This has the potential to reduce reliance on the private car and encourage the use of public transport, which will help to minimise transport-related emissions. However, growth will still be directed to locations that are within close proximity of AQMAs, specifically the Larkfield AQMA and Aylesford AQMA. Increased development in these areas may also exacerbate localised congestion and delays at junctions, particularly in relation to Aylesford, which will contribute to further noise and light pollution, particularly in peak times. As such, the options are expected to have mixed minor positive and minor negative effects in relation to the SA objective.

4.55 Spatial Option 8 proposes the lowest amount of growth out of all the options. It directs minimal residential and employment growth to the existing settlement confines of Aylesford, Leybourne, Kings Hill and Tonbridge. These

are established settlements that benefit from good access to public transport, services, facilities, and local employment opportunities. Although development under this option would be located within close proximity of some of the AQMAs, the scale of growth is modest and contained, reducing the potential for increased traffic, and therefore noise pollution and associated emissions. By focusing on well-connected settlements and avoiding large-scale development, option 8 is less likely to result in considerable air quality deterioration and also limit additional light pollution. Therefore, the option is expected to have a negligible effect in relation to the SA objective.

SA objective 13: To protect material assets and minimise waste

4.56 Minerals consultation (and safeguarding) areas cover the majority of the borough, and so it is likely that the amount of development proposed by each of the eight spatial options would at least fall within some of these areas. The spatial options delivering the highest amount of growth (1, 2, 4 and 5) are expected to have significant negative effects in relation to this SA objective, as the scale of growth proposed under these options could sterilise mineral resources unless extracted beforehand. They are also likely to lead to an increased demand for construction materials and produce waste in the short-term as a result of development. Minor negative effects are expected for Spatial Options 3, 6 and 7 as the reduced scale of development proposed under these options would place less pressure on mineral resources compared to Spatial Options 1, 2, 4 and 5, while also generating less waste. Spatial Option 8 proposes such a small amount of development that despite it coming forwards in areas that fall within minerals consultation and safeguarding areas, it is not considered enough to have an effect on this objective compared to the other options. Therefore, Spatial Option 8 is expected to have a negligible effect in relation to this objective.

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

4.57 Tonbridge and Malling Borough Council has a housing need of 1,097 dwellings per annum. This equates to 19,746 dwellings in total over the plan period 2024-2042. Taking into account extant permissions, recent completions

and windfall allowance (6,994 dwellings in total), there is a shortfall of 12,634 dwellings over the plan period. Therefore, Tonbridge and Malling Borough Council should seek to meet this need to ensure there is no housing shortfall.

4.58 Spatial Options 1, 2 and 5 would provide the highest quantum of residential development out of all eight options and would deliver a significant number of new homes within Tonbridge and Malling Borough. Spatial Option 4 also proposes a considerable number of new homes, and like options 1, 2 and 5 would deliver the identified shortfall. The higher levels of residential growth under these four options would also provide opportunities to deliver a range of housing sizes, types and tenures. Therefore, all four options are expected to have significant positive effects in relation to SA objective 14.

4.59 Spatial Options 3, 6, 7 and 8 will deliver considerably fewer homes and would not meet the shortfall. Further to this, the limited scale of development under these four options may constrain the delivery of affordable and specialist housing and fail to meet the needs of a growing population. The shortfall could also increase affordability pressures across the borough and reduce the ability to support sustainable patterns of development. Therefore, Spatial Options 3, 6, 7 and 8 are expected to have significant negative effects in relation to SA objective 14. The significant negative effect under option 8 will be particularly bad considering the limited amount of development it allows for.

Summary

4.60 Out of all eight options, option 4 is expected to have the most significant positive effects, followed by options 2 and 5. This is partly due to the fact each of these three options supports a sustainable amount of development that will meet the housing shortfall, while also not having too considerable an impact on the environment compared to the highest growth option (option 1). Further to this, options 2, 4 and 5 (as well as option 1, which performs less well overall for other reasons) would support large extensions to sustainable settlements of 800+ units and so alongside new development, would likely provide supporting infrastructure. Options 6, 7 and 8 score a lot of minor positive effects compared to the other options. This is due to the fact these options propose a smaller amount of development and will therefore have potentially more limited effects on the environment compared to some of the other options, although this depends on the exact location of development and how it is designed as some of the locations for growth are in more environmentally sensitive areas. These options also avoid areas of landscape sensitivity. However, they will not meet

the housing shortfall. Spatial Option 3 also receives many minor positive effects. However, it will also not meet the housing shortfall.

4.61 Three of the eight options are expected to have numerous significant negative effects compared to the other options, namely options 1, 2 and 5, closely followed by option 4. This is due to the fact these options support the highest amount of growth out of all options and so are more likely to have adverse effects on the environment, while also placing an increasing amount of pressure on existing services and facilities, and potentially open space. That is unless services and facilities are provided alongside development, such as under option 4 which will involve large extensions of 800+ units.

Preferred option

4.62 TMBC has selected Option 2 to take forward in the Local Plan, including the large extension element of Option 4. The strategy is based around sustainable settlements only, but with large extensions, that could help deliver key pieces of infrastructure needed in the Borough, which would be less likely to be delivered through smaller sites only, as well as meeting local need. As noted at the start of this chapter, the options appraised above were developed early on in the plan-making process, before all evidence relating to the sites was available. Once this is factored in, it is possible that the yield under Option 4 would drop below the net need, meaning that it is no longer a reasonable option to be taken forward in the Local Plan. Option 2 is the next best performing option that meets local needs.

Figure 4.1: Spatial growth option 1 – maximise growth in all locations

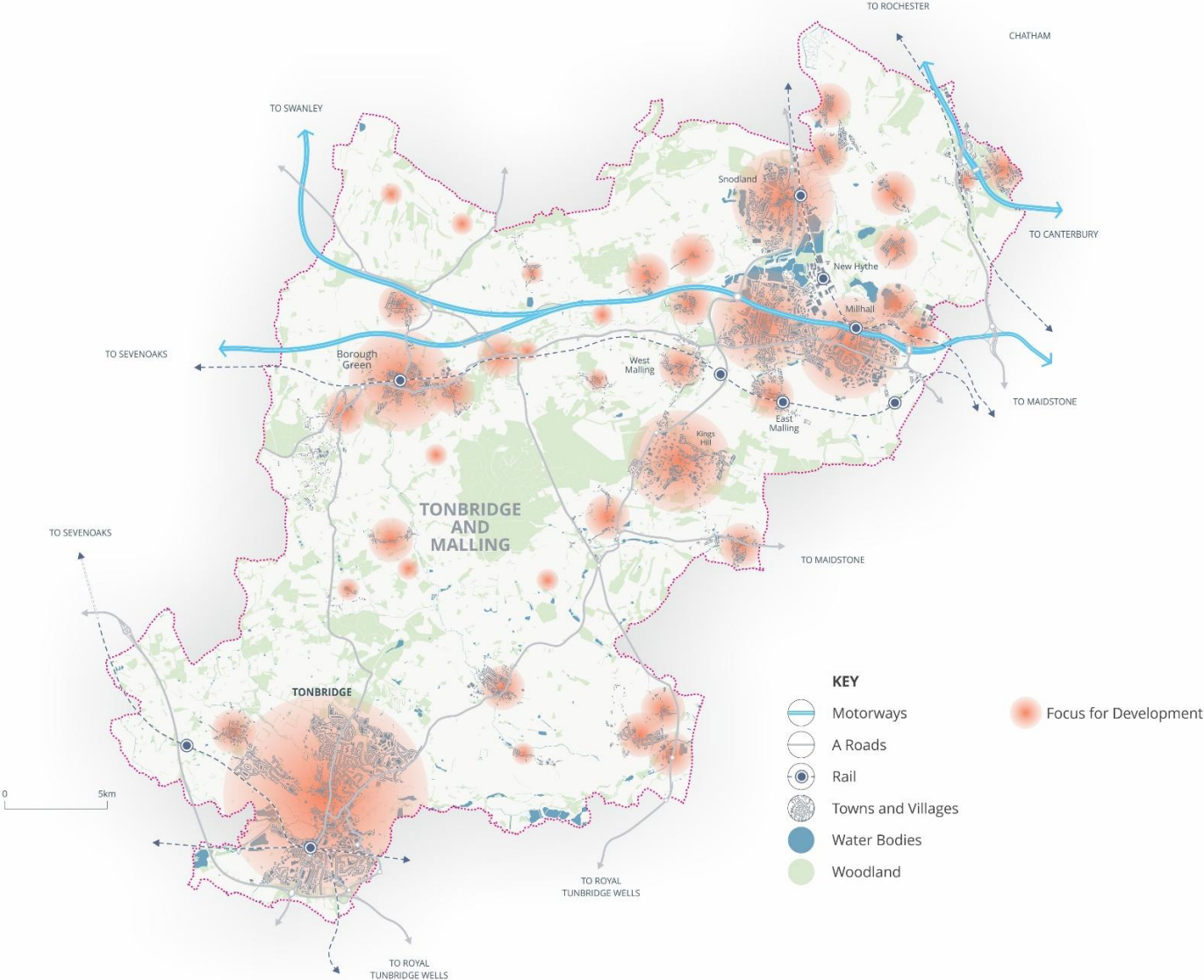


Figure 4.2: Spatial growth option 2 – focus growth in and around sustainable settlements

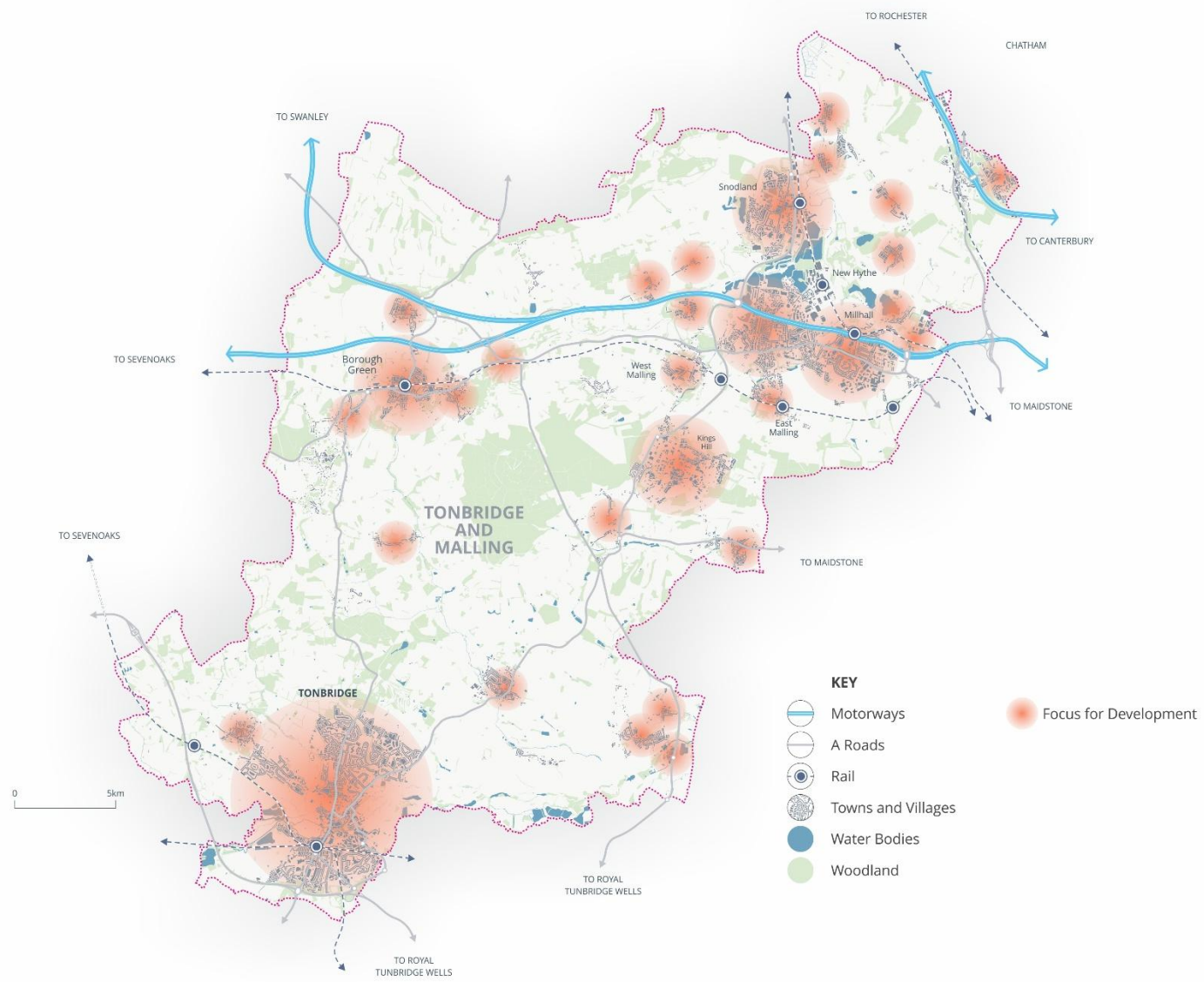


Figure 4.3: Spatial growth option 3 – focus growth in and around sustainable settlements excluding large extensions to sustainable settlements

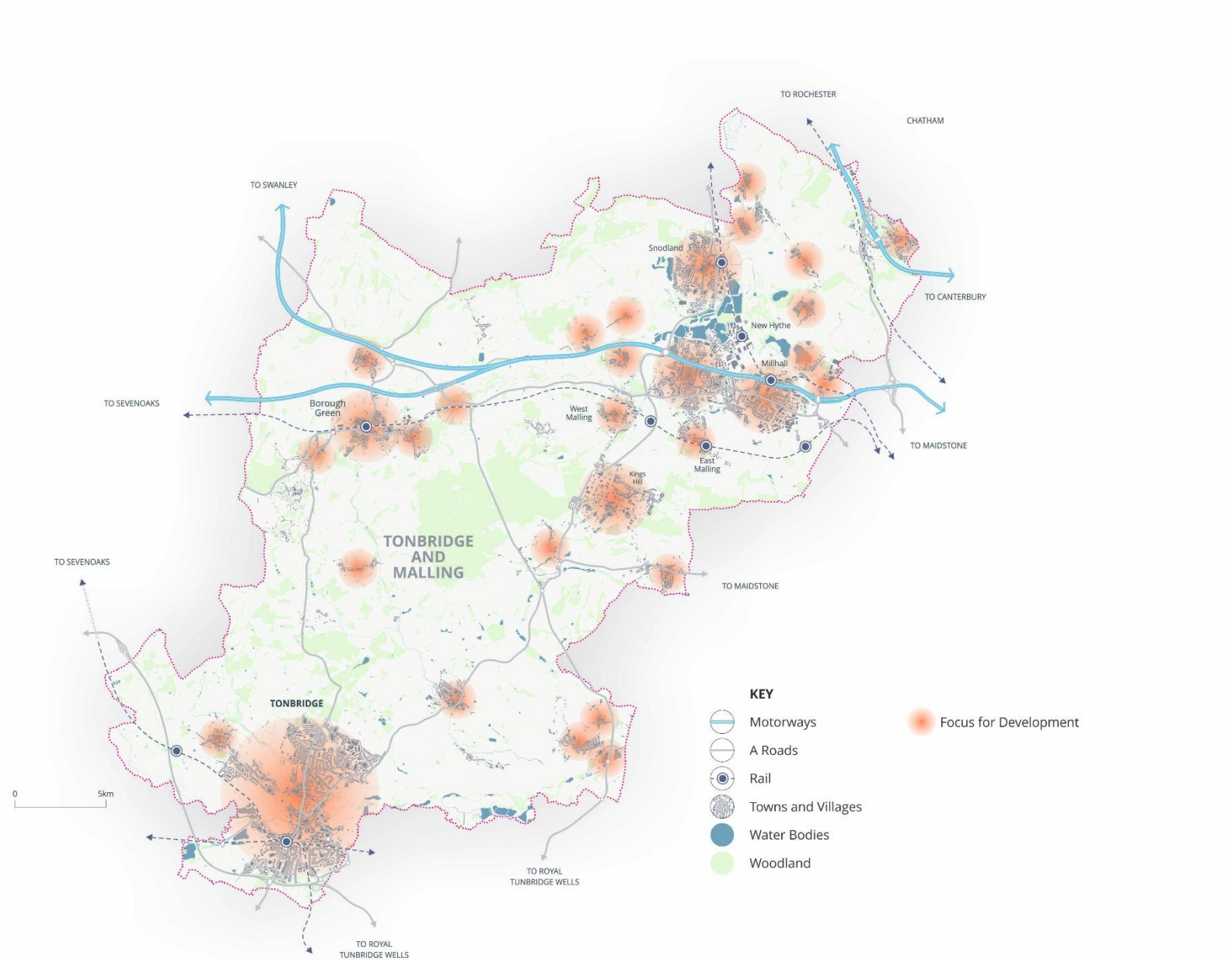


Figure 4.4: Spatial growth option 4 – focus growth in sustainable settlements and on large extensions to sustainable settlements

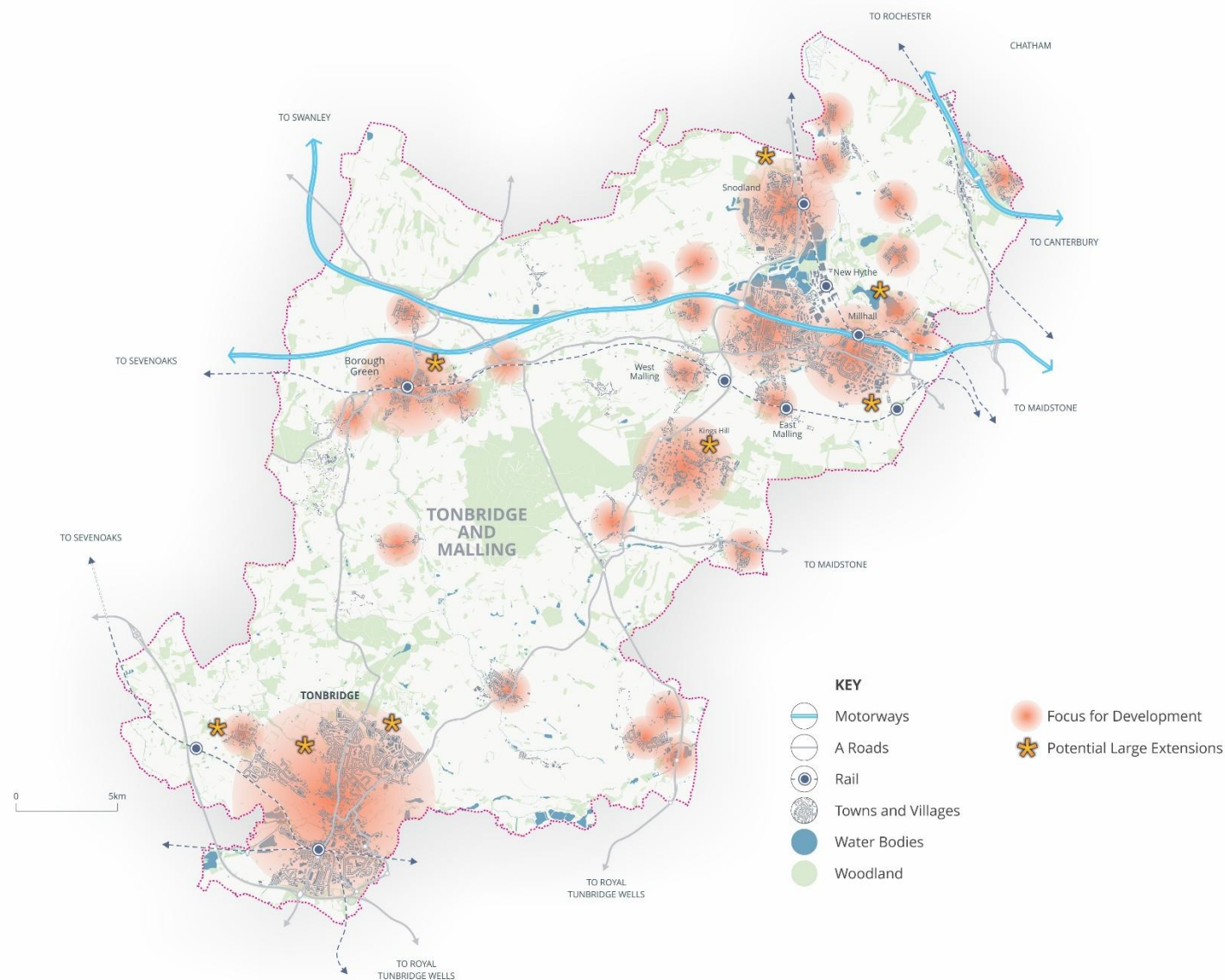


Figure 4.5: Spatial growth option 5 – focus growth in and around sustainable locations outside of the National Landscapes

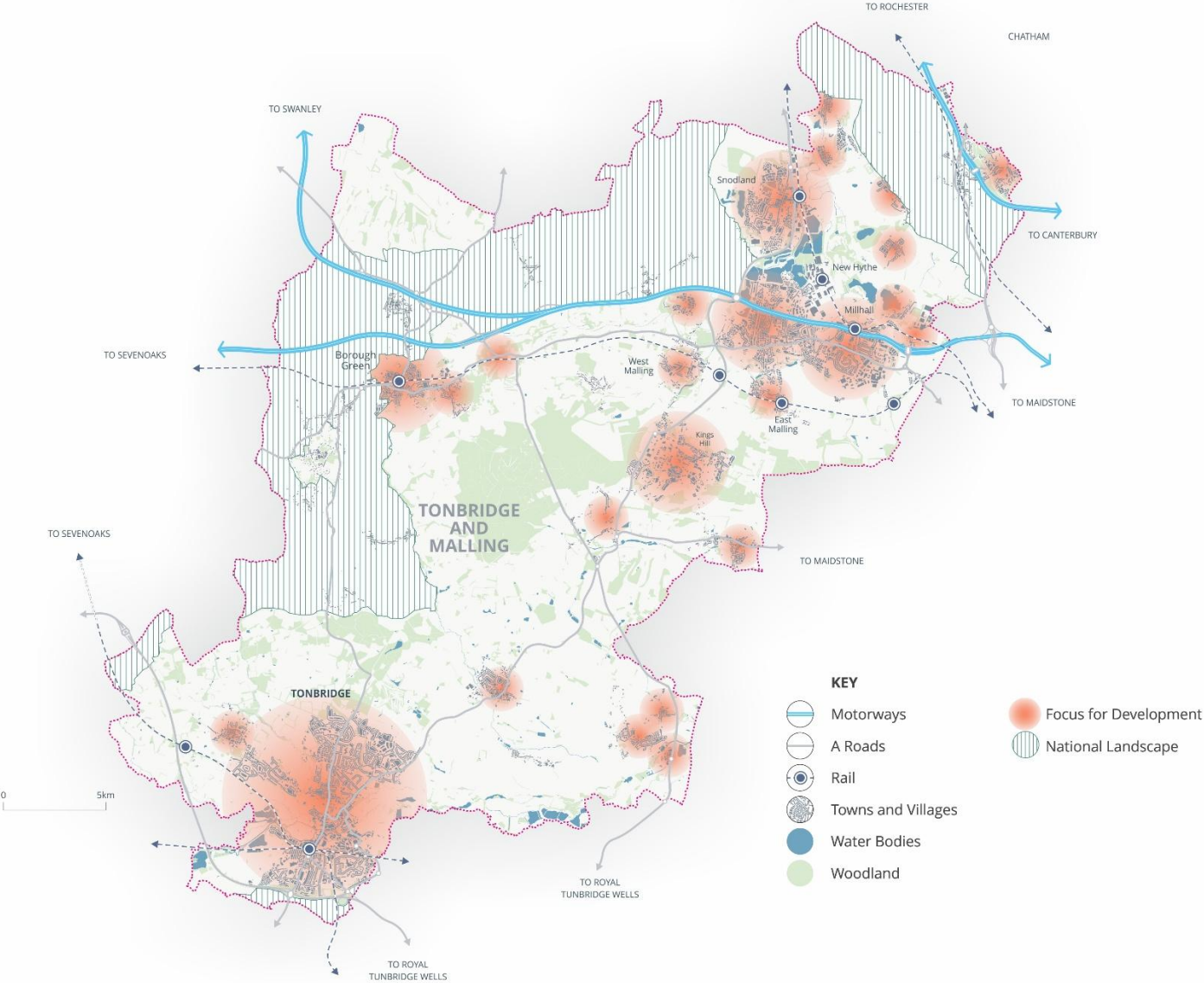


Figure 4.6: Spatial growth option 6 – focus growth in and around sustainable locations outside of the Green Belt

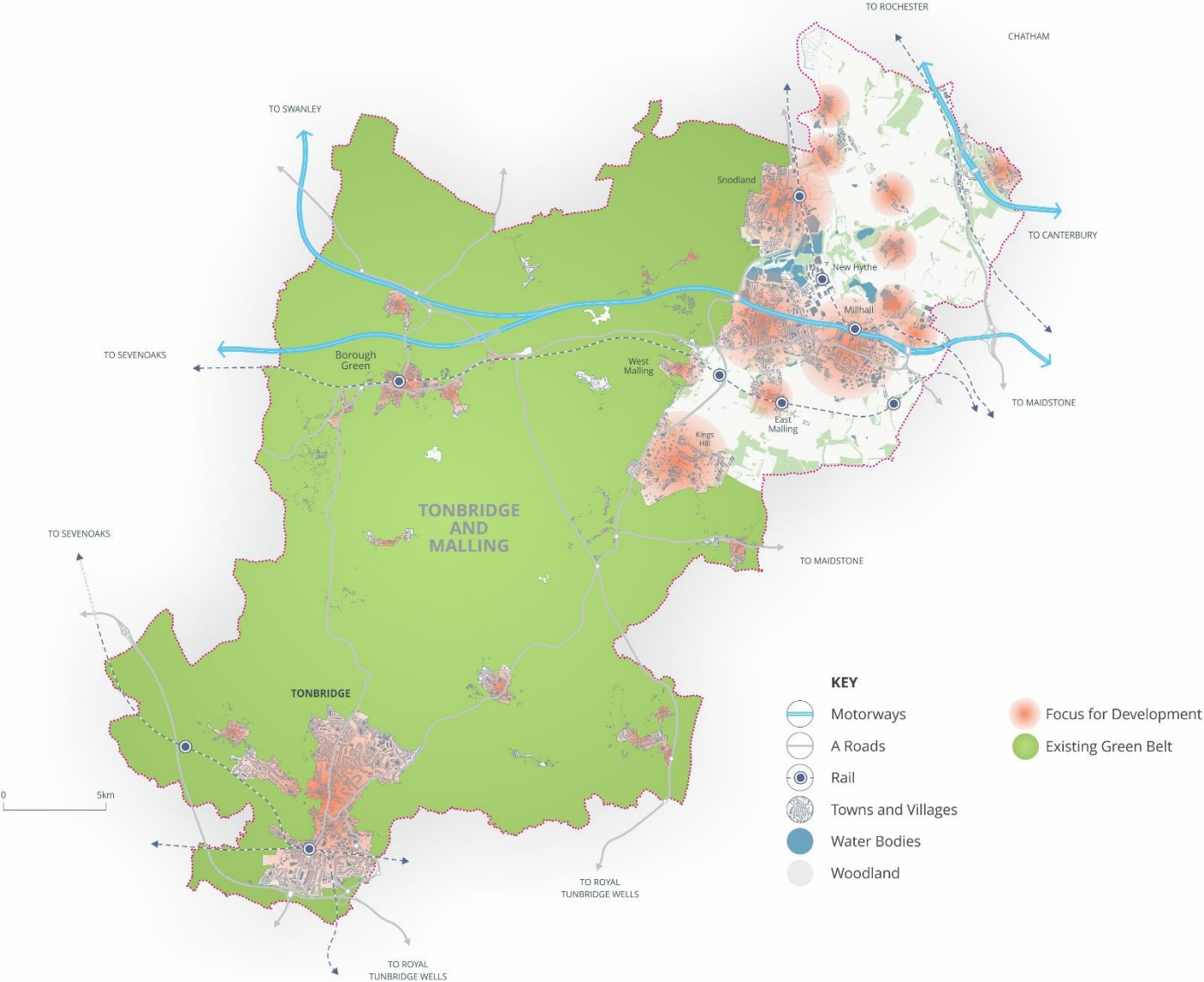


Figure 4.7: Spatial growth option 7 – focus growth in and around sustainable locations outside of the National Landscapes and the Green Belt

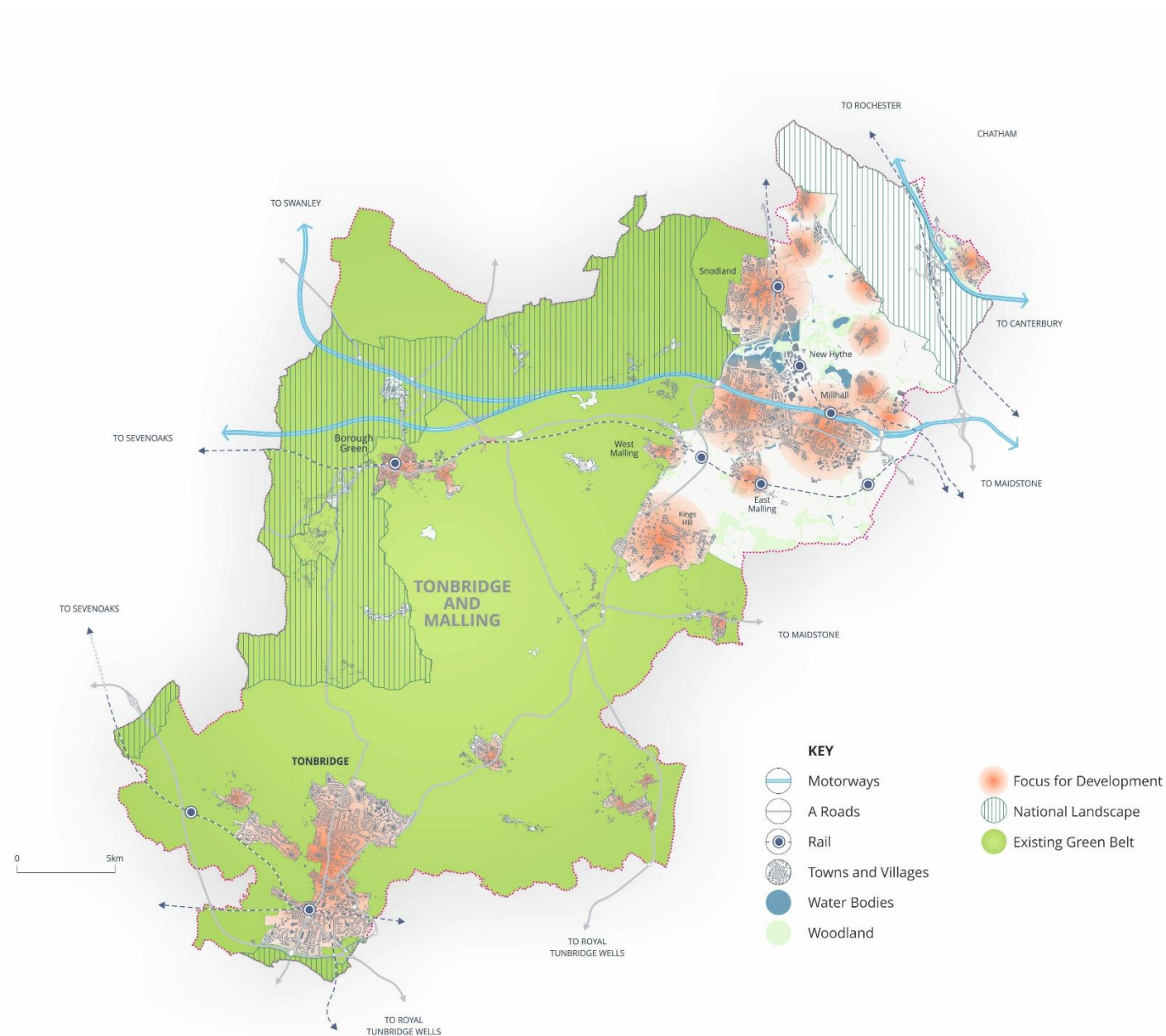
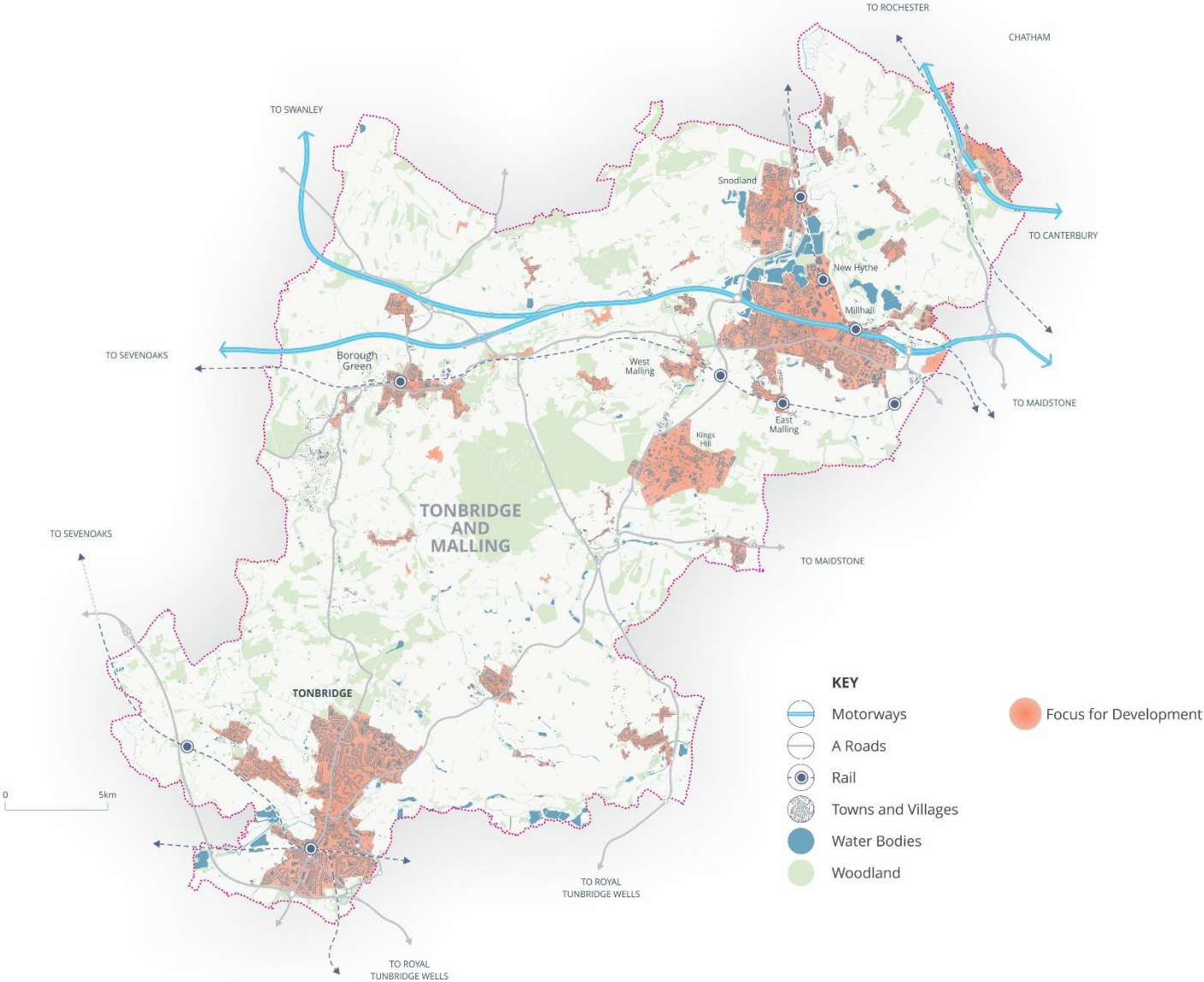


Figure 4.8: Spatial growth option 8 – within existing settlement confines



Chapter 5

Sustainability Appraisal findings for the reasonable alternative development site options

5.1 This chapter summarises the SA findings for the reasonable alternative development site options that are being considered for potential allocation in the Tonbridge and Malling Local Plan. A total of 352 residential sites, 39 employment sites and 25 mixed use sites have been appraised (416 sites in total). These sites have been appraised on their own merits on a 'policy-off' basis, i.e. considering only the location of the site, based on existing conditions and without taking into account opportunities to mitigate potential negative effects. The criteria against which these sites have been appraised are provided in Appendix D. **Figure 5.1** to **5.6** show the locations of the residential, employment and mixed use site options.

5.2 The likely effects of each site option are presented in Table 5.1 for residential sites, Table 5.2 for employment sites and Table 5.3 for mixed use sites, and justification for the identified effects is summarised by each SA objective below. In some instances, a site may be repeated in more than one table – this is when it has been considered for more than one proposed use. These sites have '_r' written after their ID. Unless otherwise stated, the effects are assumed to be long-term and permanent.

5.3 The Council's reasons for selecting or rejecting each option are set out in the Land Availability Assessment.

Table 5.1: SA findings for the residential site options

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58491	+	-	-?	0	--?	--?	0?	-?	-	+	N/A	0	0	+
58493	+	-	-?	0	-?	--?	-?	0	-	+	N/A	0	0	+
58499	+	-	++?	0	-?	--?	--?	-?	++	++	N/A	0	-?	+
58507	++	++	+?	0	-?	0	--?	-?	++	++	N/A	0	-?	++
58513	++	-	+?	0	-?	--?	-?	-?	--	+	N/A	0	-?	+
58517	+	-	+?	0	-?	--?	-?	-?	--	+	N/A	0	-?	+
58528	+	-	+?	0	-?	--?	--?	0	--	-	N/A	0	-?	+
58531	+	++	+?	0	-?	-?	--?	0	--	-	N/A	0	-?	+
58538	++	++	++?	0	-?	-?	--?	0	--	++	N/A	0	-?	+
58539	--?/+	++	++?	0	--?	-?	--?	-?	++	+	N/A	0	-?	+
58541	++	++	++?	0	-?	0	--?	-?	++	+	N/A	0	-?	+
58550	++	++	+?	0	-?	0	--?	-?	++	+	N/A	--	-?	+
58552	--?/+	++	++?	0	-?	0	--?	-?	-	+	N/A	0	-?	+
58559	--?/+	++	++?	0	-?	0	--?	--?	-	++	N/A	0	-?	+
58565	++/--?	++	++?	0	--?	0	--?	0	++	++	N/A	--	-?	+
58576	+	+	++?	0	-?	-?	--?	-?	++	++	N/A	0	-?	++
58587	+	++	++?	0	-?	-?	--?	--?	++	++	N/A	0	-?	++
58596	+	++	+?	0	--?	-?	--?	0	--	++	N/A	0	-?	+
58606	+	-	+?	0	--?	--?	-?	-?	--?	+	N/A	0	-?	+
58613	+	++	+?	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
58615	+	-	-?	0	--?	--?	-?	-?	-	-	N/A	0	-?	+
58617	+	-	-?	0	--?	--?	-?	-?	--	-	N/A	0	-?	+
58619	--?/+	-	+?	0	--?	--?	--?	-?	-	+	N/A	0	-?	+
58625	++	0	-?	0	-?	--?	-?	--?	++	+	N/A	0	-?	+
58641	+	-	+?	0	--?	--?	-?	-?	--?	+	N/A	0	-?	+
58643	+	-	-?	0	--?	--?	-?	-?	--?	+	N/A	0	-?	+
58646	+	-	-?	0	--?	--?	-?	-?	++/-	+	N/A	0	0	+
58654	+	-	-?	0	--?	--?	--?	0	--	-	N/A	0	0	+
58655	+	-	-?	0	-?	--?	-?	-	--	-	N/A	0	0	+
58656	+	-	+?	0	-?	--?	-?	-?	--?	-	N/A	0	0	++

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58658	+	-	-?	0	--?	--?	-?	-?	--?	+	N/A	0	0	+
58660	+	-	-?	0	-?	--?	-?	-?	++	+	N/A	0	0	+
58661	+	-	+?	0	-?	--?	-?	0	--?	-	N/A	0	0	+
58662	+	-	+?	0	-?	--?	--?	0	--	+	N/A	0	0	+
58663	+	-	+?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	++
58665	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
58668	+	0	+?	0	-?	--?	--?	-?	--?	+	N/A	0	0	+
58669	+	-	+?	0	-?	--?	--?	--?	--?	+	N/A	0	0	+
58670	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
58673	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
58678	++	0	+?	0	-?	--?	--?	0	--	+	N/A	0	0	+
58686	++	++	++?	0	--?	0	--?	0	++	++	N/A	0	-?	+
58695	+	-	-?	0	--?	--?	--?	0	--?	-	N/A	0	0	+
58698	+	-	+?	0	--?	--?	-?	0	-	+	N/A	0	-?	+
58699	+	-	-?	0	-?	--?	-?	0	--?	+	N/A	0	0	+
58706	+	0	+?	0	--?	--?	-?	0	--	+	N/A	0	0	+
58708	+	-	-?	0	-?	--?	--?	0	-	+	N/A	0	0	+
58709	+	-	-?	0	--?	--?	--?	0	-	+	N/A	0	0	+
58710	+	-	-?	0	-?	--?	--?	0	-	+	N/A	0	0	+
58715	--?/+	-	-?	0	--?	--?	--?	0	--?	++	N/A	0	0	+
58717	++	-	+?	0	-?	--?	--?	0	--?	++	N/A	0	0	+
58720	++	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	0	+
58721	+	-	-?	0	-?	--?	--?	--	--?	++	N/A	0	0	+
58723	+	++	+?	0	-?	-?	--?	--?	--?	+	N/A	0	-?	++
58725	++	++	++?	0	-?	0	-?	0	++	+	N/A	0	0	+
58731	++/--?	++	++?	0	0?	0	--?	0	++	+	N/A	0	0	++
58732	++/--?	++	++?	0	-?	-?	-?	-	-	+	N/A	0	0	+
58738	+	-	-?	0	-?	-?	--?	0	--?	+	N/A	0	0	+
58746	+	0	+?	0	-?	-?	--?	--?	--	+	N/A	0	-?	++
58748	+	+	+?	0	-?	-?	--?	--?	--	+	N/A	0	-?	+
58751	+	+	+?	0	0?	-?	--?	--?	--	+	N/A	0	0	++
58759	+	-	-?	0	--?	--?	--?	0	++/--	-	N/A	0	0	+
58761	+	-	-?	0	0?	--?	-?	0	--?	-	N/A	0	0	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58763	+	-	-?	0	-?	--?	-?	--?	--?	+	N/A	0	0	+
58766	+	-	-?	0	-?	--?	--?	0	++	-	N/A	0	0	+
58775	+	-	-?	0	-?	--?	-?	0	--?	-	N/A	0	0	+
58779	+	-	-?	0	--?	--?	--?	0	--?	-	N/A	0	0	+
58780	+	-	-?	0	--?	--?	-?	0	-	-	N/A	0	0	+
58781	+	-	-?	0	-?	--?	-?	0	-	-	N/A	0	0	+
58782	+	-	-?	0	--?	--?	-?	0	--?	-	N/A	0	0	+
58783	+	-	-?	0	-?	--?	--?	0	--	-	N/A	0	-?	+
58785	+	-	++?	0	-?	--?	--?	0	--?	-	N/A	0	0	+
58786	+	-	-?	0	-?	--?	--?	0	--?	-	N/A	0	0	+
58787	+	-	-?	0	--?	--?	--?	0	--?	-	N/A	0	0	+
58790	+	-	++?	0	-?	--?	--?	--	-	+	N/A	0	-?	+
58791	+	-	-?	0	--?	--?	--?	--?	++	+	N/A	0	-?	+
58792	+	-	-?	0	-?	--?	--?	0	--?	-	N/A	0	-?	+
58793	+	-	-?	0	-?	-?	--?	0	--	-	N/A	0	-?	+
58794	+	-	-?	0	--?	--?	--?	0	-	-	N/A	0	-?	+
58798	+	-	-?	0	-?	--?	--?	0	--?	+	N/A	0	0	+
58799	+	-	-?	0	--?	--?	--?	0	--	-	N/A	0	-?	+
58800	+	-	-?	0	-?	--?	--?	-?	++	-	N/A	0	-?	+
58813	++	++	+++?	0	-?	--?	-?	--?	++	++	N/A	0	0	+
58828	+	+	++?	0	-?	0	--?	0	++	+	N/A	0	0	+
58832	+	++	++?	0	-?	--?	--?	-?	++	+	N/A	0	-?	+
58835	++	++	+++?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	+
58841	++/--?	++	+++?	0	-?	--?	--?	0	--?	+	N/A	0	0	+
58842	+	++	++?	0	-?	--?	--?	0	--?	-	N/A	0	-?	+
58843	++	++	+++?	0	-?	0	--?	--?	++	++	N/A	0	0	+
58846	++	++	+++?	0	-?	0	--?	--?	++	++	N/A	0	0	++
58849	++	++	+++?	0	-?	--?	--?	--?	++	++	N/A	0	0	++
58850	++	++	+++?	0	-?	--?	--?	--?	++	++	N/A	0	0	+
58851	++	++	+++?	0	-?	--?	--?	--?	++	++	N/A	0	0	+
58852	++	++	+++?	0	-?	--?	-?	--?	++	++	N/A	0	0	+
58858	++	++	+++?	0	-?	--?	-?	-?	++	++	N/A	0	0	+
58876	++	++	+++?	0	0?	0	--?	--?	++	++	N/A	--	-?	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58879	++/--?	++	++?	0	0?	0	--?	--?	++	++	N/A	--	0	+
58897	++	++	+	0	-?	0	--?	0	-	+	N/A	0	0	+
58902	+	++	+	0	-?	0	--?	--?	++	+	N/A	0	-?	+
59592	++	++	+	0	--?	-?	--?	0	--?	+	N/A	0	0	+
59594	+	++	-?	0	-?	-?	--?	0	--	+	N/A	0	-?	+
59595	+	-	-?	0	-?	--?	--?	0	--?	-	N/A	0	0	+
59597	+	-	+	0	-?	--?	--?	0	--?	+	N/A	0	-?	+
59598	+	-	+	0	-?	--?	--?	0	--	-	N/A	0	-?	+
59601	++	+	++?	0	-?	-?	--?	--?	--?	+	N/A	0	-?	+
59603	+	++	+	0	-?	-?	-?	0	--	+	N/A	0	-?	+
59604	+	-	-?	0	-?	--?	-?	0	++/--?	+	N/A	0	-?	+
59608	+	-	-?	0	-?	--?	--?	-?	++	+	N/A	0	-?	+
59610	+	-	-?	0	--?	--?	--?	-?	--?	+	N/A	0	-?	+
59613	+	+	+	0	0?	-?	--?	--?	--	+	N/A	0	0	++
59615	++	++	+	0	-?	-?	--?	0	--?	+	N/A	0	0	+
59617	+	0	+	0	-?	-?	--?	-?	--	-	N/A	0	-?	+
59618	+	-	-?	0	--?	--?	-?	-?	--	+	N/A	0	0	+
59619	+	++	+	0	--?	-?	--?	0	--	-	N/A	0	-?	+
59623	++	++	+	0	-?	0	--?	0	++	+	N/A	0	0	+
59624	+	-	-?	0	-?	--?	--?	0	--	+	N/A	0	-?	+
59625	++	++	++?	0	-?	-?	-?	--?	--?	+	N/A	0	0	+
59627	+	-	-?	0	--?	--?	--?	--?	-	+	N/A	0	0	+
59629	+	-	-?	0	--?	--?	-?	--	--	+	N/A	0	0	+
59630	--?/+	++	+	0	--?	-?	-?	0	-	+	N/A	0	-?	++
59631	+	-	+	0	-?	--?	-?	-?	--	-	N/A	0	-?	++
59633	+	-	-?	0	-?	--?	--?	0	--?	+	N/A	0	0	+
59636	+	+	++?	0	-?	-?	--?	-?	--	++	N/A	0	-?	++
59639	+	-	+	0	-?	--?	--?	0	--	-	N/A	0	0	+
59640	+	-	+	0	-?	--?	--?	-	--	-	N/A	0	0	+
59644	++	++	-?	0	--?	-?	-?	--?	-	+	N/A	0	-?	+
59647	++	+	++?	0	-?	-?	--?	0	--	+	N/A	0	0	+
59653	++	-	+	0	-?	--?	--?	0	--?	++	N/A	0	0	++
59654	++	+	+	0	-?	-?	--?	-?	--	++	N/A	--	-?	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
59657	++	++	-?	0	--?	-?	-?	-	-	+	N/A	0	-?	+
59660	++	++	++?	0	-?	0	--?	--?	++	++	N/A	0	0	++
59661	++	++	++?	0	--?	-?	-?	--?	-	+	N/A	0	-?	++
59664	++	+	+?	0	-?	-?	--?	-?	--	++	N/A	0	-?	+
59667	+	+	+?	0	-?	-?	--?	--	--?	++	N/A	0	0	+
59671	+	-	-?	0	0?	--?	--?	-?	--?	-	N/A	0	0	+
59674	+	++	++?	0	--?	-?	--?	-?	-	++	N/A	0	-?	+
59675	++	-	+?	0	--?	--?	-?	0	--	-	N/A	0	-?	++
59676	+	0	++?	0	--?	-?	--?	--?	--	++	N/A	0	-?	++
59677	+	-	-?	0	--?	--?	--?	0	--	-	N/A	0	-?	+
59678	+	-	+?	0	--?	--?	--?	--?	--	++	N/A	0	-?	++
59679	++	-	+?	0	-?	--?	--?	-	--?	++	N/A	0	0	+
59685	+	++	+?	0	-?	-?	-?	0	--	+	N/A	0	0	++
59690	+	++	++?	0	-?	-?	-?	--?	--?	+	N/A	0	0	++
59691	+	-	-?	0	--?	--?	-?	-?	--?	+	N/A	0	-?	++
59692	++	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	0	+
59693	+	++	+?	0	-?	-?	-?	0	--	+	N/A	0	0	++
59702	++	0	+?	0	--?	--?	--?	0	--	+	N/A	0	0	++
59704	+	-	-?	0	-?	--?	--?	0	--?	++	N/A	0	0	+
59706	+	-	-?	0	--?	--?	--?	--?	++	-	N/A	0	0	+
59709	++	++	+?	0	-?	--?	--?	--?	--?	++	N/A	--	-?	+
59714	+	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	-?	+
59715	+	+	++?	0	-?	-?	--?	-?	--	++	N/A	0	-?	+
59718	++/--?	++	+?	0	-?	--?	--?	-?	-	+	N/A	0	-?	+
59721	+	-	+?	0	-?	--?	-?	0	--	-	N/A	0	0	++
59726	+	-	-?	0	--?	--?	-?	-?	--	-	N/A	0	-?	++
59730	+	-	+?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	+
59731	+	0	++?	0	-?	--?	--?	0	--	+	N/A	0	0	++
59736	+	-	+?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	+
59737	+	0	+?	0	--?	-?	-?	-?	--?	+	N/A	0	-?	+
59740	++	++	++?	0	-?	-?	--?	--?	--	++	N/A	0	-?	++
59744	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	0	+
59745	+	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	-?	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
59746	++	++	++?	0	-?	-?	-?	--?	--?	+	N/A	0	-?	++
59747	+	-	-?	0	--?	--?	--?	--?	--?	-	N/A	0	0	++
59748	++	++	+	0	-?	--?	--?	-?	--?	++	N/A	0	-?	+
59749	+	-	+	0	-?	--?	--?	0	--	-	N/A	0	-?	++
59750	+	0	+	0	-?	-?	--?	--?	--?	+	N/A	0	-?	+
59752	+	++	+	0	--?	-?	--?	--?	--	+	N/A	0	-?	++
59754	+	-	-?	0	-?	--?	-?	0	-	-	N/A	0	-?	++
59755	+	-	-?	0	--?	--?	-?	0	-	-	N/A	0	-?	++
59756	++	++	++?	0	--?	-?	--?	0	--	++	N/A	0	-?	+
59757	+	-	-?	0	-?	--?	-?	0	--	-	N/A	0	-?	+
59758	+	++	-?	0	-?	-?	--?	0	--	+	N/A	0	-?	+
59759	+	++	-?	0	-?	-?	--?	0	--	+	N/A	0	-?	++
59760	+	0	-?	0	-?	-?	--?	0	--	+	N/A	0	-?	++
59761	--?/+	++	+	0	--?	-?	-?	0	-	+	N/A	0	-?	++
59762	+	-	+	0	-?	--?	--?	0	++	+	N/A	0	-?	+
59763	+	-	-?	0	--?	--?	--?	-?	--	-	N/A	0	-?	++
59765	+	++	++?	0	-?	--?	--?	-?	--?	+	N/A	0	-?	++
59766	+	-	-?	0	--?	--?	--?	--?	--	++	N/A	0	-?	++
59770	+	0	+	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
59771	++	+	+	0	--?	-?	--?	--?	-	+	N/A	0	-?	+
59773	+	-	-?	0	-?	--?	--?	-?	--	-	N/A	0	-?	+
59775	+	-	-?	0	-?	--?	--?	0	++/--?	+	N/A	0	0	+
59776	++	+	++?	0	-?	-?	--?	0	--?	-	N/A	0	-?	++
59777	+	0	+	0	-?	--?	--?	--?	++	+	N/A	0	-?	+
59778	--?/+	0	+	0	-?	--?	--?	0	--?	+	N/A	0	0	+
59781	++/--?	++	++?	0	-?	0	--?	0	++	++	N/A	0	-?	+
59782	+	0	+	0	-?	-?	--?	0	--	+	N/A	0	0	++
59783	+	-	-?	0	-?	--?	--?	0	--?	++	N/A	0	0	++
59789	+	+	+	0	0?	-?	--?	--?	--	+	N/A	0	0	++
59797	++/--?	++	+	0	-?	-?	--?	-	--	+	N/A	0	-?	++
59799	+	-	-?	0	--?	--?	--?	--?	--	+	N/A	0	-?	++
59800	++/--?	++	+	0	-?	-?	--?	--?	--	+	N/A	0	-?	++
59802	++	++	+	0	-?	-?	--?	--?	--	+	N/A	0	-?	++

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
59803	++	+	+?	0	-?	-?	--?	-?	--	++	N/A	0	-?	++
59804	++/--?	++	++?	0	--?	-?	--?	--?	--?	+	N/A	0	-?	++
59806	+	-	-?	0	--?	--?	--?	--?	--	-	N/A	0	-?	++
59807	+	-	+?	0	-?	--?	--?	0	--	++	N/A	0	-?	+
59811	+	-	-?	0	-?	--?	--?	--?	--?	-	N/A	0	-?	++
59812	+	-	-?	0	-?	--?	-?	-?	--?	-	N/A	0	-?	+
59825	+	-	+?	0	-?	--?	--?	-	--?	-	N/A	0	0	+
59831	++	0	+?	0	-?	--?	-?	0	--	+	N/A	0	-?	++
59834	++	++	++?	0	--?	-?	-?	--?	--?	+	N/A	0	-?	++
59837	+	0	+?	0	0?	-?	--?	0	--	+	N/A	0	0	+
59838	+	++	+?	0	--?	--?	--?	--?	-	+	N/A	0	-?	+
59841	++	0	+?	0	--?	--?	--?	0	--	+	N/A	0	0	+
59842	++	+	+?	0	-?	-?	--?	--?	--?	+	N/A	0	0	++
59843	++	++	+?	0	-?	--?	--?	-?	--?	++	N/A	0	-?	+
59844	++	++	++?	0	--?	-?	--?	0	--	++	N/A	0	-?	+
59847	++	++	++?	0	--?	--?	--?	--?	--	++	N/A	0	-?	++
59848	+	-	+?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	+
59852	++	++	+?	0	-?	-?	-?	-?	--	++	N/A	0	-?	++
59861	++	++	-?	0	--?	-?	-?	-?	--	++	N/A	0	-?	++
59870	+	-	-?	0	-?	--?	-?	-?	++	-	N/A	0	-?	+
59871	+	0	+?	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
59873	+	-	-?	0	-?	--?	-?	-?	++	-	N/A	0	-?	+
59877	++	++	+?	0	--?	--?	--?	--?	--?	++	N/A	0	-?	+
59878	++	++	++?	0	0?	--?	--?	-?	++	++	N/A	0	0	++
59881	+	0	+?	0	-?	--?	--?	0	--?	+	N/A	0	0	++
59883	+	-	-?	0	-?	--?	-?	-?	--?	-	N/A	0	0	+
59893	++	++	+?	0	-?	-?	--?	--?	--?	+	N/A	0	0	++
59895	+	+	-?	0	-?	-?	--?	--?	--	+	N/A	0	-?	++
59896	++	+	+?	0	-?	-?	--?	--	-	+	N/A	0	0	+
59904	+	-	-?	0	-?	--?	--?	-?	--?	-	N/A	0	-?	+
59907	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
59909	++	+	+?	0	-?	-?	--?	--?	--	+	N/A	0	-?	++
59911	+	-	-?	0	--?	--?	--?	-?	--?	+	N/A	0	-?	+

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59912	+	-	-?	0	-?	--?	--?	-?	--?	-	N/A	0	-?	+
59913	--?/+	-	-?	0	-?	--?	-?	-?	++	-	N/A	0	-?	+
59916	+	0	+?	0	-?	--?	--?	-?	++	-	N/A	0	0	+
59917	+	-	+?	0	-?	--?	--?	-?	--?	-	N/A	0	0	+
59919	++	+	+?	0	-?	-?	-?	0	--	++	N/A	0	-?	+
59922	+	-	+?	0	-?	--?	--?	-?	--?	-	N/A	0	0	+
59923	+	-	+?	0	--?	--?	--?	-?	--?	+	N/A	0	-?	++
59928	+	-	-?	0	-?	--?	-?	0	--?	-	N/A	0	0	+
59932	--?/+	-	-?	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
59933	++	++	+?	0	-?	0	-?	0	++	+	N/A	0	-?	+
59935	--?/+	-	-?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	++
59938	+	+	++?	0	-?	-?	--?	-?	--	++	N/A	0	-?	+
59944	++	++	+?	0	-?	0	--?	-	++	+	N/A	0	-?	+
59945	+	-	-?	0	-?	--?	--?	0	--?	-	N/A	0	0	++
59946	+	++	+?	0	-?	-?	--?	--?	--?	+	N/A	0	-?	+
59949	+	-	+?	0	-?	--?	--?	0	--	-	N/A	0	-?	+
59951	+	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	-?	+
59953	++	++	+?	0	0?	0	--?	-?	++	+	N/A	0	-?	+
59954	++	++	-?	0	-?	--?	--?	--?	-	+	N/A	0	-?	+
59956	+	-	-?	0	-?	--?	-?	0	--	+	N/A	0	0	++
59957	++	++	+?	0	-?	-?	--?	0	--?	++	N/A	0	-?	+
65311	+	++	-?	0	-?	-?	--?	0	--	+	N/A	0	0	+
68338	+	++	+?	0	-?	-?	--?	0	++	+	N/A	0	-?	+
68339	++/--?	++	+?	-	--?	0	--?	0	++	+	N/A	0	-?	+
68341	++	++	+?	0	--?	--?	--?	--?	++	++	N/A	0	-?	+
68345	+	-	+?	0	0?	--?	--?	0	++	+	N/A	0	0	+
68348	+	++	+?	0	-?	-?	--?	0	--?	+	N/A	0	-?	+
68349	+	0	+?	0	-?	0	-?	-?	++	+	N/A	0	-?	+
68351	++	++	-?	-	-?	0	--?	0	++	+	N/A	0	-?	+
68352	+	-	-?	0	--?	--?	-?	0	++	-	N/A	0	-?	+
68355	+	-	-?	0	--?	--?	--?	-?	--?	-	N/A	0	0	+
68357	+	-	-?	0	-?	--?	-?	-?	++	-	N/A	0	0	+
68360	+	-	+?	0	--?	--?	--?	-?	--?	+	N/A	0	-?	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
68362	+	+	++?	0	-?	-?	--?	0	--	++	N/A	0	-?	++
68363	+	-	++?	0	-?	--?	--?	0	--	++	N/A	0	-?	+
68365	++	+	+	-	-?	-?	--?	0	--	+	N/A	0	0	+
68368	+	++	-?	0	-?	-?	--?	0	--	+	N/A	0	-?	++
68369	++/--?	++	++?	0	--?	-?	-?	--?	--?	+	N/A	0	-?	++
68371	+	-	-?	0	--?	--?	--?	--?	--?	++	N/A	0	-?	+
68372	+	0	+	0	-?	--?	--?	-?	--?	-	N/A	0	0	+
68376	+	0	+	0	0?	-?	--?	0	--	+	N/A	0	0	+
68378	+	-	+	0	-?	--?	--?	--?	++/--?	0	N/A	0	0	+
68382	+	-	+	0	-?	--?	--?	0	--?	++	N/A	0	0	+
68383	+	-	-?	0	--?	--?	--?	0	--?	-	N/A	0	-?	+
68384	+	-	-?	0	-?	--?	--?	-?	--?	-	N/A	0	0	+
68387	+	-	+	0	--?	--?	-?	-?	--?	-	N/A	0	0	+
68388	+	-	-?	0	-?	--?	-?	0	--	+	N/A	0	0	+
68394	+	-	-?	0	-?	--?	-?	0	--	-	N/A	0	-?	+
68395	+	-	-?	0	-?	-?	--?	--?	--	-	N/A	0	-?	++
68396	+	-	+	0	-?	-?	--?	0	--	+	N/A	0	-?	+
68398	+	-	+	0	-?	--?	--?	0	--	+	N/A	0	-?	++
68399	+	+	+	0	-?	-?	--?	0	--?	-	N/A	0	-?	++
68401	++	++	+	0	-?	-?	--?	0	--?	+	N/A	0	0	+
68405	+	++	+	0	-?	-?	--?	0	--	+	N/A	0	-?	+
68406	--?/+	0	+	0	-?	-?	--?	-?	--?	+	N/A	0	-?	+
68410	+	-	++?	-	-?	--?	-?	--?	--?	++	N/A	0	-?	+
68413	--?/+	-	+	0	-?	--?	--?	--?	++	++	N/A	0	0	++
68416	+	-	-?	0	-?	--?	--?	0	++/--?	++	N/A	0	0	++
68417	+	-	+	0	-?	--?	-?	0	--?	+	N/A	0	-?	+
68418	+	+	+	0	-?	-?	--?	0	--	+	N/A	0	0	++
68419	++	++	++?	0	-?	--?	--?	0	-	+	N/A	0	-?	+
68420	++	+	+	0	--?	-?	--?	-?	--	++	N/A	--	-?	++
68421	+	++	+	0	--?	-?	-?	-?	--	+	N/A	0	-?	++
68423	+	++	++?	0	--?	--?	--?	--?	--	+	N/A	0	-?	++
68424	+	0	++?	0	-?	--?	--?	0	--	+	N/A	0	0	++
68425	++	0	+	0	--?	--?	--?	-?	--?	+	N/A	0	-?	++

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
68426	+	++	+?	0	--?	-?	--?	0	--	++	N/A	0	-?	+
68427	++	0	+?	0	--?	--?	--?	--?	--	+	N/A	0	-?	+
68428	+	0	+?	0	-?	--?	--?	-?	--?	-	N/A	0	-?	+
68432	++	++	+?	0	--?	-?	--?	0	--?	+	N/A	0	0	++
68434	+	-	+?	0	-?	-?	--?	0	--	+	N/A	0	-?	+
68436	--?/+	+	+?	0	-?	--?	--?	0	--	+	N/A	0	0	++
68437	++	++	+?	0	--?	0	--?	0	++	+	N/A	0	-?	+
68440	+	-	+?	0	0?	-?	--?	0	--	+	N/A	0	-?	+
68441	++	++	+?	0	-?	-?	-?	0	--?	+	N/A	0	0	++
68442	+	-	+?	0	-?	-?	--?	0	--	+	N/A	0	-?	+
68443	++	++	+?	0	0?	0	--?	0	++	+	N/A	0	-?	+
68446	++	-	+?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	+
68447	++	++	+?	0	0?	0	--?	0	++	+	N/A	0	-?	+
68448	++	++	+?	-	-?	0	-?	-	++	+	N/A	0	-?	+
68449	++	+	+?	0	-?	-?	--?	0	++/--	+	N/A	0	0	+
68450	++	++	+?	0	-?	0	-?	0	++	+	N/A	0	-?	+
68452	++	+	++?	0	-?	-?	--?	--?	--?	+	N/A	0	-?	+
68455	+	-	+?	0	-?	--?	--?	--?	--?	-	N/A	0	-?	+
68456	+	++	++?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	+
68457	+	-	+?	0	-?	--?	--?	0	-	+	N/A	0	-?	+
68458	+	++	++?	0	-?	--?	--?	--?	--	+	N/A	0	-?	++
68459	+	-	+?	0	--?	--?	--?	0	--?	++	N/A	0	-?	++
68460	++	+	+?	0	-?	-?	--?	0	--	++	N/A	0	-?	+
68461	++	+	+?	0	--?	-?	--?	-	--	++	N/A	0	-?	+
68463	+	-	+?	0	--?	--?	-?	-	--?	+	N/A	0	-?	+
68466	+	0	+?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
68467	+	-	-?	0	--?	--?	--?	-?	++	+	N/A	0	-?	+
68471	++	++	++?	0	-?	--?	--?	--?	++	++	N/A	0	0	++
68472	++/--?	++	++?	0	0?	0	--?	--?	++	++	N/A	0	0	+
58508	+	++	++?	0	-?	0	--?	-?	-	+	N/A	0	-?	+
58524	+	++	+?	0	--?	-?	--?	0	--	+	N/A	0	-?	++
58554	++	++	+?	-	-?	0	--?	-?	++	+	N/A	--	-?	+
58556	++	++	+?	0	-?	0	--?	-?	++	+	N/A	0	-?	+

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58593	++/--?	++	++?	-	0?	0	--?	--?	++	++	N/A	--	-?	++
58609	++	++	+?	-	-?	--?	--?	-?	++	++	N/A	0	-?	+
58635	++	-	-?	-	-?	--?	--?	-?	++	++	N/A	0	-?	+
58693	++/--?	++	+?	0	--?	-?	--?	0	++/--	++	N/A	0	-?	++
58745	+	-	-?	0	-?	--?	-?	0	--	-	N/A	0	0	+
58757	+	0	+?	0	0?	-?	--?	--?	--	+	N/A	0	0	+
58765	++	-	+?	0	--?	--?	--?	--?	--?	-	N/A	0	0	+
58827	++	+	+?	0	-?	-?	--?	0	--	++	N/A	--	0	+
58830	++	+	+?	0	--?	-?	--?	--?	--?	++	N/A	0	0	+
58903	--?/+	++	+?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	++
59725	+	-	-?	0	--?	--?	-?	-?	--?	+	N/A	0	-?	+
59824	+	+	++?	0	-?	-?	--?	0	--	++	N/A	0	-?	++
59830_r	++	++	++?	0	--?	--?	--?	--?	++/--?	++	N/A	0	-?	++
59943	--?/+	-	-?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	++
59950	++	0	+?	0	--?	--?	--?	--?	--?	+	N/A	0	-?	++
60039	+	-	-?	0	--?	--?	--?	-?	++/--?	+	N/A	0	-?	+
60040	++	-	+?	0	--?	--?	--?	0	++/--	+	N/A	0	-?	+
60041	+	-	-?	0	-?	--?	--?	0	--?	+	N/A	0	0	+
60162	++	+	+?	0	--?	-?	--?	0	++	+	N/A	0	0	+
60163	+	-	-?	0	-?	--?	-?	0	++	+	N/A	0	-?	+
68411	++	++	++?	0	-?	--?	-?	--?	++	++	N/A	0	0	++
68433	++	++	+?	0	--?	-?	--?	--	--?	+	N/A	0	0	+
68439	++	+	+?	0	-?	-?	--?	0	--?	+	N/A	0	0	+
68445_r	++	-	+?	0	--?	--?	--?	0	++	+	N/A	0	0	+
UCS2	++	++	++?	0	-?	--?	--?	--?	++	++	N/A	0	0	+

Table 5.2: SA findings for the employment site options

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58631	+	++	N/A	++	-?	--?	--?	--?	++	++	N/A	--	-?	N/A
58639	+	-	N/A	++	-?	--?	--?	-?	++	++	N/A	0	-?	N/A

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58645	+	-	N/A	+	-?	--?	-?	-?	--?	-	N/A	0	0	N/A
58675	+	-	N/A	+	-?	--?	-?	-?	++	+	N/A	0	-?	N/A
58687	--?/+	++	N/A	++	--?	-?	--?	--?	-	++	N/A	0	-?	N/A
59593	+	-	N/A	+	--?	--?	--?	-?	++/--?	+	N/A	0	-?	N/A
59599	+	-	N/A	+	-?	--?	--?	0	--?	+	N/A	0	0	N/A
59600	+	-	N/A	+	-?	--?	--?	-?	++	+	N/A	0	0	N/A
59616	+	+	N/A	++	-?	-?	--?	--?	--	++	N/A	0	-?	N/A
59648	+	-	N/A	+	-?	--?	-?	0	--	-	N/A	0	-?	N/A
59680	+	-	N/A	++	-?	--?	-?	--?	--?	-	N/A	0	0	N/A
59681	+	-	N/A	+	-?	--?	--?	--?	++	-	N/A	0	0	N/A
59697	+	-	N/A	+	-?	--?	--?	0	--?	+	N/A	0	-?	N/A
59727	+	++	N/A	++	-?	-?	--?	--	++	++	N/A	0	-?	N/A
59738	+	-	N/A	++	-?	--?	-?	0	--	++	N/A	0	-?	N/A
59788	+	-	N/A	++	-?	--?	--?	--?	--?	+	N/A	0	-?	N/A
59822	+	0	N/A	+	--?	--?	-?	-?	--?	+	N/A	0	-?	N/A
59836	+	++	N/A	++	--?	-?	--?	0	-	++	N/A	0	-?	N/A
59856	+	-	N/A	++	-?	--?	--?	-?	++/--	++	N/A	0	-?	N/A
59863	+	-	N/A	++	-?	--?	-?	-?	--	+	N/A	0	-?	N/A
59874	+	++	N/A	+	-?	--?	--?	-?	--?	+	N/A	0	-?	N/A
59879	+	++	N/A	++	-?	--?	--?	-?	++	++	N/A	--	0	N/A
68354	+	-	N/A	+	--?	--?	--?	--?	++	-	N/A	0	0	N/A
68358	+	++	N/A	+	-?	--?	-?	-?	++	-	N/A	0	-?	N/A
68373	--?/+	-	N/A	++	-?	--?	--?	0	++	++	N/A	0	-?	N/A
68377	--?/+	+	N/A	+	--?	-?	--?	--?	--?	+	N/A	0	-?	N/A
68390	+	-	N/A	+	--?	--?	--?	--?	++	-	N/A	0	0	N/A
68402	+	-	N/A	+	-?	--?	--?	--?	--	+	N/A	0	0	N/A
68403	+	-	N/A	++	--?	--?	--?	-?	--?	-	N/A	0	0	N/A
68407	--?/+	++	N/A	++	-?	-?	--?	-?	--	+	N/A	0	-?	N/A
68412	+	++	N/A	+	-?	--?	-?	-?	++	+	N/A	0	0	N/A
68414	+	++	N/A	++	-?	--?	--?	--?	--?	+	N/A	0	-?	N/A
68415	+	-	N/A	+	-?	--?	--?	--?	++/--?	-	N/A	0	0	N/A
68431	+	++	N/A	++	--?	--?	--?	-?	--?	++	N/A	0	-?	N/A
68444	+	++	N/A	++	--?	-?	-?	-?	--	+	N/A	0	-?	N/A

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
68454	+	-	N/A	++	-?	--?	--?	--?	--?	-	N/A	0	0	N/A
68462	+	0	N/A	++	-?	-?	--?	--?	--	+	N/A	0	-?	N/A
59670	+	-	N/A	++	--?	--?	--?	-?	--	++	N/A	0	-?	N/A
UCS1	+	++	N/A	++	-?	--?	-?	--?	++	++	N/A	0	0	N/A

Table 5.3: SA findings for the mixed use site options

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
58844	++	++	++?	++	-?	0	--?	--?	++	++	N/A	--	0	+?
58872	++/--?	++	++?	++	0?	--?	--?	--?	++	++	N/A	--	0	++?
58873	++	++	++?	++	0?	0	--?	--?	++	++	N/A	--	-?	+?
58877	++	++	++?	++	0?	0	--?	--?	++	++	N/A	--	0	+?
59607	+	-	-?	+	--?	--?	-?	--	--	+	N/A	0	0	+?
59646	--?/+	+	-?	++	--?	-?	--?	--?	--?	++	N/A	0	-?	+?
59683	++/--?	++	++?	++	-?	-?	--?	--?	--?	+	N/A	0	-?	+?
59722	+	-	-?	+	-?	--?	--?	0	--	+	N/A	0	-?	+?
59796	++	++	++?	++	0?	0	--?	-?	++	++	N/A	0	0	++?
59830	++	++	++?	++	--?	--?	--?	--?	++/--?	++	N/A	0	-?	++?
59846	+	-	-?	++	--?	--?	-?	--?	--?	-	N/A	0	0	++?
59851	+	++	++?	++	--?	-?	--?	--?	--	++	N/A	0	-?	+?
59868	+	++	-?	++	--?	0	-?	0	++	++	N/A	0	-?	++?
59876	+	+	++?	+	0?	-?	--?	--	--	+	N/A	0	0	+?
59894	+	-	-?	++	-?	--?	-?	-?	--?	+	N/A	0	0	+?
59940	+	-	-?	+	-?	--?	-?	0	--	-	N/A	0	0	+?
68361	+	-	++?	+	-?	--?	--?	0	--	+	N/A	0	-?	+?
68375	+	-	-?	++	-?	--?	--?	--?	--?	+	N/A	0	-?	+?
68389	+	-	-?	+	-?	--?	--?	--?	--	+	N/A	0	-?	+?
68392	+	-	-?	++	--?	--?	--?	--?	--?	+	N/A	0	0	++?
68397	+	0	++?	+	-?	-?	--?	0	--	+	N/A	0	-?	++?
68445	++	-	++?	+	--?	--?	--?	0	++	+	N/A	0	0	+?
58630	++	++	++?	++	-?	--?	--?	-?	++	++	N/A	--	-?	+?

Site ID	SA1: Health and well-being	SA2: Services and facilities	SA3: Education	SA4: Economic growth	SA5: Biodiversity and geodiversity	SA6: Landscape and townscape	SA7: Historic environment	SA8: Water	SA9: Soils	SA10: Climate change mitigation	SA11: Climate change adaptation	SA12: Pollution	SA13: Waste	SA14: Housing
59723	+	-	-?	+	-?	--?	--?	0	--	+	N/A	0	0	+
59815	++	++	++?	++	0?	0	--?	--?	++	++	N/A	--	-?	+

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

5.4 All residential and mixed use sites perform positively in relation to their proximity to existing healthcare facilities and to areas of open space/walking and cycle paths/play areas/recreation and sport facilities. This is because Tonbridge and Malling has a good range of healthcare facilities available across the borough, in addition to residents also being able to utilise healthcare facilities in neighbouring local authorities. Tonbridge and Malling is also largely rural in nature and therefore has good access from settlements to the wider countryside through a dense Public Rights of Way (PRoW) network. This allows access to a wide variety of open spaces and recreation opportunities across the borough which can be beneficial to health and well-being. However, significant negative effects are expected for 9% (34) of the residential and mixed use site options since those sites contain an area of open space or accommodate an outdoor sports facility that may be lost as a result of development. However, these negative effects are uncertain as the effects will depend on whether these existing features are in fact lost to new development, or whether they can be incorporated into the development proposal or re-provided elsewhere as part of the development proposal.

5.5 Minor positive effects are expected for all employment site options since all options are located within 800m of an existing area of open space/sport facilities or a walking and/or cycling path. These facilities may offer opportunities for employees to engage in active outdoor recreation around working hours, or to commute via active modes of travel, all of which would benefit health and wellbeing. Five of these site options (58687, 68373, 68377 and 68407) could, however, result in the potential loss of an existing open space or outdoor sports facility as a result of development, although this is again uncertain as these features may not be lost to development, and may instead be incorporated into development or re-provided elsewhere.

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

5.6 Sites have been assessed on the basis of their location, with sites within settlements higher up in the settlement hierarchy being assumed to have better access to services and facilities than sites in settlements lower down in the hierarchy.

5.7 Out of the residential site options, 44% (154) are expected to have minor negative effects as they are not within or adjacent to (i.e. less than or equal to 100m) of a settlement. Therefore, these residential site options have more limited access to services and facilities. 11% (37) of the residential site options are expected to have minor positive effects in relation to this objective, as they are within or adjacent to a Primary Village, and so are likely to have better access to services and facilities. 35% (123) of the site options are within or adjacent to a Principal Service Centre or Service Centre and so are expected to have a significant positive effect in relation to access to services and facilities. 11% (39) of the remaining sites are expected to have negligible effects as they are within or adjacent to a Secondary Village and so have moderate access to everyday amenities.

5.8 The majority of the mixed use site options are expected to perform negatively against this SA objective. 44% (11) of the mixed use site options are expected to have minor negative effects as they are not within or adjacent to a settlement and so will not provide easy access to existing services and facilities. 44% (11) of the mixed use sites are expected to have significant positive effects on this SA objective, while a very small number are expected to have minor positive effects (8% (2)). This is because the sites that score a significant positive effect are within or adjacent to a Principal Service Centre or Service Centre, while the sites that score a minor positive effect are within or adjacent to a Secondary Village. More services and facilities are available at these types of settlements compared to elsewhere.

5.9 While access to services and facilities is perhaps more significant for residential and mixed use sites, the location of employment sites in relation to community facilities and services is also relevant as people may make use of the facilities and services near to their workplaces around working hours. However, 56% (22) of the employment site options are expected to have minor negative effects on SA objective 2 as they are not within or adjacent to a settlement with easy access to services and facilities.

5.10 It is noted, however, that larger scale development site options could potentially incorporate the provision of new community facilities and services. For any sites, but particularly large sites with potential significant negative effects that may be taken forward for allocation in the Local Plan, it is recommended that particular consideration is given to the provision of new facilities and/or services.

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

5.11 The majority of the residential and mixed use site options are expected to perform positively against SA objective 3. 19% (66) of the residential site options and 40% (10) of the mixed use site options are expected to have significant positive effects on this SA objective, as these site options are located within 800m of an existing primary school and within 1,000m of an existing secondary school. Around half (178) of the residential site options and 16% (4) of the mixed use site options are expected to have minor positive effects since these site options are either within 800m of a primary school or 1,000m of an existing secondary school, but not both. Minor negative effects are expected for 31% (108) of the residential site options and 44% (11) of the mixed use site options, as these site options are located more than 800m from an existing primary school and more than 1,000m for an existing secondary school. However, uncertainty exists as the effects will depend on there being capacity available at those existing facilities to accommodate new pupils. It is also noted that the provision of new residential development could stimulate the provision of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain.

5.12 SA objective 3 was scoped out of the appraisal of employment site options as the location of employment sites is not considered likely to affect this objective.

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

5.13 The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. However, if a residential site contains an existing business, this could be lost as a result of development.

5.14 3% (9) of the residential sites are likely to have minor negative effects in relation to this objective as they contain existing businesses that could be lost

as a result of development. The remaining residential site options are expected to have negligible effects in relation to economic growth and the delivery of employment opportunities.

5.15 All of the mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. However, employment opportunities generated at site options that are accessible by sustainable transport links is likely to benefit the highest number of residents. The borough is well served by sustainable transport links, with nine railway stations and two additional stations along the borough boundary. Of the mixed use and employment site options, 59% (38) are expected to have significant positive effects on this SA objective as these site options are 5ha or over and/or are within 800m of a railway station. A further 41% (26) of site options are expected to have minor positive effects as these site options are 5ha or less and/or are within 400m of a bus stop and/or cycle path (but are more than 800m from a railway station).

SA objective 5: To protect and enhance biodiversity and geodiversity

5.16 Tonbridge and Malling has a range of sites designated for their environmental sensitivity, including two Special Areas of Conservation (SACs), 11 Sites of Special Scientific Interest (SSSIs) and 46 Local Wildlife Sites. The widespread distribution of these designated sites within the borough, together with the locations of the reasonable alternative site options, has resulted in the majority of residential, employment and mixed use sites having potential negative effects on SA objective 5. In total, 30% (124) of the site options are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites, or contain a locally designated site, Ancient Woodland or a Priority Habitat. As such, these sites are likely to have significant negative effects in relation to this objective. 64% (267) of the site options are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites or are within 250m of (but do not contain) a locally designated site, Ancient Woodland or a Priority Habitat. Therefore, these sites are expected to have minor negative effects in relation to this objective. Of the site options, 5% (19) of the residential sites, none of the employment sites and 24% (6) of the mixed use site options are expected to have negligible effects on this objective, as these sites are either located more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or are over 250m from a locally designated site, Ancient Woodland or Priority Habitat.

5.17 While proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

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

5.18 All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. 21% (8) of the employment site options could have significant negative effects as they are not located near any settlements, are in rural locations and/or would result in the loss of designated open spaces. This is because these sites are located outside of settlements in rural locations and so in principle there is more potential for development to have adverse effects on the landscape and/or result in the loss of designated open spaces. A further 21% (8) of the employment site options could have minor negative effects.

5.19 18% (63) of the residential site options could have significant negative effects as they are not located near any settlements, are in rural locations and/or would result in the loss of designated open spaces. A further 33% (116) of residential site options could have minor negative effects, and 10% (35) could have negligible effects as they are located within a settlement.

5.20 43% (179) of the residential, employment and mixed use site options are expected to have significant negative effects as they are within 1,000m of the Kent Downs or High Weald National Landscapes (formerly referred to as AONBs) and could therefore have adverse impacts on those designated landscapes and their settings.

5.21 However, all negative effects are uncertain at this stage as the effects on landscapes and townscape will depend on the design, scale and layout of development, which may help mitigate any adverse effects. It cannot be assumed that a site outside of a settlement will definitely have significant negative effects without this additional information about the development being available. For any sites with potential significant negative effects that are taken

forwards for allocation in the Local Plan, it is recommended that mitigation requirements are built into the associated site allocation policies.

5.22 For sites located outside of built-up areas, TMBC has commissioned landscape evidence to better understand the potential landscape impact of development, and to inform site selection and the development of site specific policies. This will inform the later stages of the SA as appropriate.

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

5.23 The built heritage and historic landscapes of Tonbridge and Malling are extensive and are an important element in providing a sense of place and civic pride for residents and visitors. 72% (28) of the employment site options, 80% (20) of mixed use site options and 76% (268) of the residential site options, have potential significant negative effects since these sites are located within 250m of a designated heritage feature. The site options could have minor negative effects on SA objective 7, other than one residential site option, as it is located between 250m and 1km from a designated heritage feature. In all cases, the negative effects are uncertain at this stage, depending on the design and layout of new development, and factors such as the topography of the land and any existing development which could affect lines of sight between heritage features and new development.

5.24 If any sites with potential significant negative effects on heritage are taken forwards for allocation in the Local Plan, it is recommended that further assessment is undertaken to identify whether and how heritage assets would in fact be affected, any mitigation that should be built into plan policies, and whether any heritage features can be conserved or enhanced as part of the proposed new development.

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

5.25 Several areas of the borough are at medium or high risk of flooding, with areas of Flood Zone 3 (high risk) located in the southern and north-easterly extents of the borough. The areas of Flood Zone 3 are located on land adjacent to the River Medway and its associated tributaries. Surface water flooding also presents a risk through the borough. In addition to risks associated with fluvial flooding and surface water flooding, the River Medway, north of Allington Lock

is vulnerable to tidal flooding. Some areas of the borough are also vulnerable to groundwater flooding. The borough also has many Source Protection Zones. Therefore, it is quite constrained in relation to hydrology and a large number of negative effects are identified for the site options in relation to at least one of the elements assessed under this objective.

5.26 While 40% (167) of all site options are expected to have negligible effects overall, the remainder are expected to have at least minor negative effects. 29% (110) of the residential and mixed use site options are expected to have significant negative effects as they are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding, and/or they contain a water body or water course or fall within or partially within Source Protection Zone 1. 41% (16) of the employment site options are expected to have significant negative effects as they are entirely or significantly within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding, and/or they contain a water body or water course or fall within or partially within Source Protection Zone 1. However, many of these effects are uncertain as effects resulting from proximity to Source Protection Zones and water bodies are uncertain at this stage.

5.27 For sites with potential significant negative effects associated with flood risk taken forwards for allocation in the Local Plan it is recommended that mitigation requirements are built into the associated site allocation policies, for example the incorporation of Sustainable Drainage Systems (SuDS). Where only part of a site is in an area of higher flood risk, consideration should be given to whether built development can be directed to other parts of the site, with the area of higher flood risk remaining as open space, for example. It is noted that the Level 1 Strategic Flood Risk Assessment (SFRA) assesses each site and has been factored in to the Council's site selection process, and a Level 2 scoping exercise has also been undertaken to identify where a Level 2 SFRA may be required for potential allocations.

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

5.28 Most of the borough is rural in character with approximately 71% lying within the Metropolitan Green Belt and most of the borough classed as agricultural land, with the majority classified as Grade 3 agricultural land as well as large areas of Grade 2 land. As a result, many of the development site options are expected to have negative effects on SA objective 9. 33% (138) of

the development site options are expected to have significant negative effects as they are greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3a agricultural land which would be lost to development. In some areas, it is unknown whether a site comprises Grade 3a (high quality) or 3b (not classed as high quality) agricultural land as GIS data which distinguishes between Grade 3a and 3b land was not available for the whole Borough, and so a further 36% (149) of the development site options may have significant negative effects but these effects are recorded as uncertain. Effects relating to the loss of high quality soils would be long term and permanent and cannot be mitigated.

5.29 22% (93) of the development site options are expected to have significant positive effects as they are located on brownfield land, and therefore land of agricultural value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.

5.30 Some mixed effects are recorded for sites that comprise both brownfield and greenfield land. All of these sites are expected to have significant positive effects due to the fact they partially comprise brownfield land, mixed with a significant negative effect, as they comprise best and most versatile agricultural land. Uncertainty is recorded where it is unknown if the agricultural land is Grade 3a or 3b. One of these sites is likely to have a minor negative effect as it does not comprise best and most versatile agricultural land.

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

5.31 The majority of the development site options are expected to perform positively against SA objective 10, with 25% (102) of the site options expected to have significant positive effects as they are within 800m of a railway station so could result in more sustainable transport use in place of cars, reducing emissions from transport. 22% (90) of the site options are expected to have minor negative effects as they are more than 800m from a railway station and more than 400m from a bus stop and cycle route; therefore, opportunities at these development sites to make use of non-car based modes of transport to access services, facilities and job opportunities are likely to be more limited. However, the actual use of sustainable transport modes will depend on people's behaviour. It is also possible that new transport links such as bus routes or

cycle paths may be provided as part of new developments, particularly at larger sites, but this cannot be assumed.

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

5.32 SA objective 11 was scoped out of the appraisal of residential, employment and mixed use site options. The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The likely effects of all site options on this objective are therefore negligible.

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

5.33 The main source of air pollution in the borough is road traffic from the main A roads and the M20. Consequently, there are five Air Quality Management Areas (AQMA) relating to emissions from motor vehicles. The AQMA are small, focused areas, as demonstrated by the low number of site options likely to have negative effects on this objective. Just 4% (18) of all site options are likely to have significant negative effects, consisting of ten residential sites, two employment sites and six mixed use sites. These effects were identified because they are within 100m of an AQMA. All other development site options are not within 100m of an AQMA and therefore are expected to have negligible effects on this SA objective. For any sites close to AQMA that are taken forward for allocation in the Local Plan, it will be particularly important to consider the incorporation of sustainable transport links within the sites to mitigate increases in traffic in those areas.

SA objective 13: To protect material assets and minimise waste

5.34 Tonbridge and Malling has extensive Minerals Safeguarding Areas that cover a large area across the northern and central portions of the borough. As a result, 61% (253) of the development site options are expected to have minor

negative effects on SA objective 13 as they are located within a Minerals Safeguarding Area and could therefore influence the efficient use of minerals, as development in a Minerals Safeguarding Area may sterilise minerals resources and restrict the availability of resources and/or impacts on site workings. However, these effects are uncertain as they will largely depend on factors such as whether the sites would in fact offer viable opportunities for minerals extraction, and it may be possible for prior extraction to occur before a site is developed.

5.35 The remaining development site options do not fall within a Minerals Safeguarding Area and are therefore expected to have negligible effects on SA objective 13.

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

5.36 All residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. 28% (98) of the residential site options are expected to have significant positive effects, as they will comprise 100 dwellings or more. It is expected that these larger sites will be able to offer a wide mix of housing, including affordable housing, as well as making a more significant individual contribution towards total local housing needs.

5.37 Mixed use sites have the potential to have positive effects, as it is expected that large mixed use sites will be able to offer a wide mix of housing, including affordable housing, as well as making a good contribution towards local housing needs. Overall, 28% (7) of mixed use site options are expected to have significant positive effects while the rest are expected to have minor positive effects. These positive effects are recorded as uncertain, as the capacity split of residential and employment land for mixed use sites is not currently available.

5.38 The location of employment sites is not considered likely to affect SA objective 14. The likely effects of all employment site options on this objective are therefore negligible.

Summary

5.39 In terms of the least sustainable site options, looking across the suite of SA objectives, there are 24 residential site options, one employment site option, and four mixed use site options (29 sites in total) that stand out as being less sustainable than other site options, as they are expected to have significant negative effects across at least five different SA objectives. These site options are as follows:

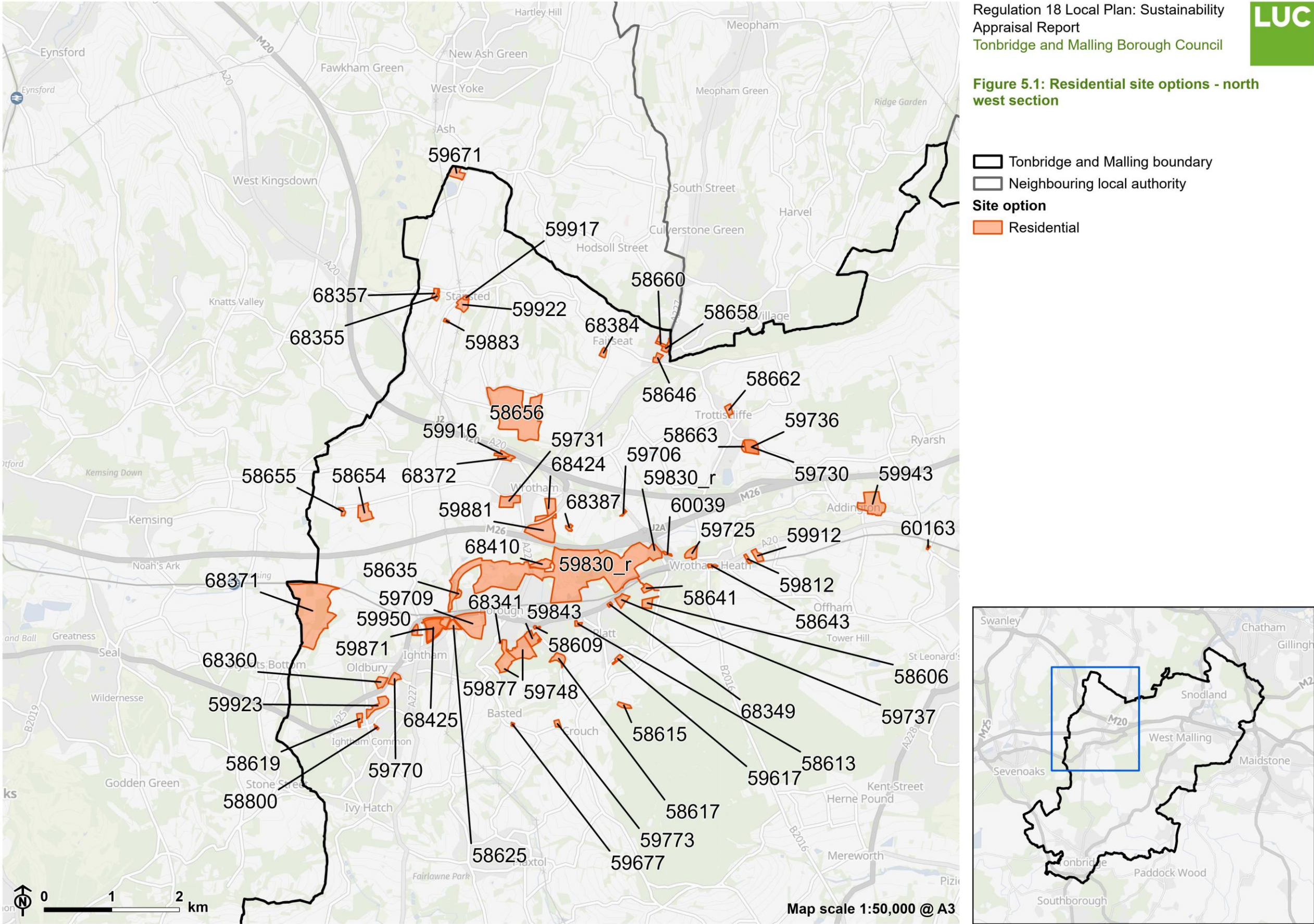
- Residential site options: Site IDs 55943, 58663, 58715, 58765, 58835, 58903, 59678, 59709, 59730, 59736, 59747, 59766, 59799, 59804, 59806, 59830_r, 59847, 59877, 59935, 59950, 68371, 68423, 68427 and 68446.
- Employment site options: Site ID 68377.
- Mixed use site options: Site IDs 58872, 59646, 59830 and 68392.

5.40 In terms of the most sustainable site options, looking across the suite of SA objectives, there are 27 residential site options and nine mixed use site options that stand out as being more sustainable than others, as they are expected to have significant positive effects across at least five different SA objectives. In terms of employment site options, there are four sites that stand out as being more sustainable than others, as they are expected to have significant positive effects across at least four different SA objectives. These sites are:

- Residential site options: Site ID 58507, 58565, 58587, 58593, 58686, 58693, 58731, 58813, 58843, 58846, 58849, 58850, 58851, 58852, 58858, 58876, 58879, 59660, 59740, 59781, 59847, 59878, 68411, 68471, 68472, 59830_r and UCS2.
- Employment site options: Site ID 58631, 59727, 59879 and UCS1.
- Mixed use site options: Site ID 58630, 58844, 58872, 58873, 58877, 59796, 59815, 59830 and 59868.

5.41 It should be noted that the site 59830_r appears above in the lists of sites that perform best and most poorly, due to the high number of significant effects, both positive and negative, associated with the site option.

Figure 5.1: Residential site options – north west section



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 Tonbridge and Malling boundary

 Neighbouring local authority

Site option

 Residential

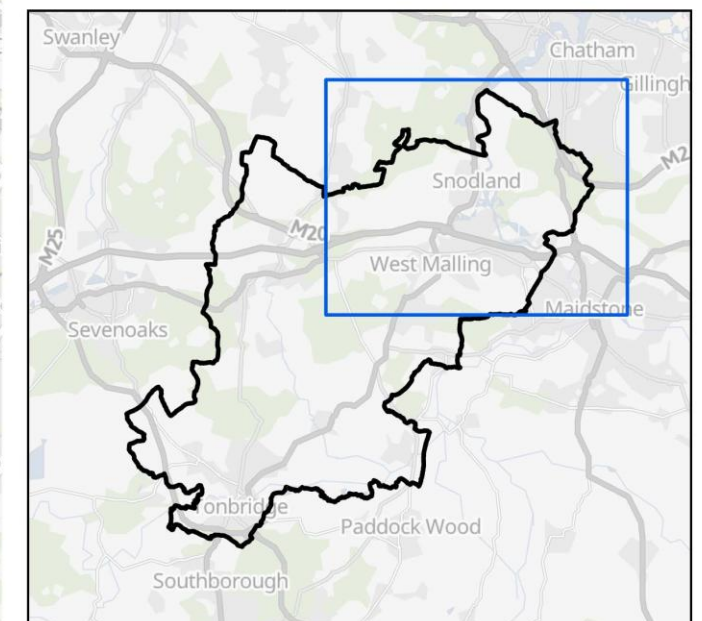
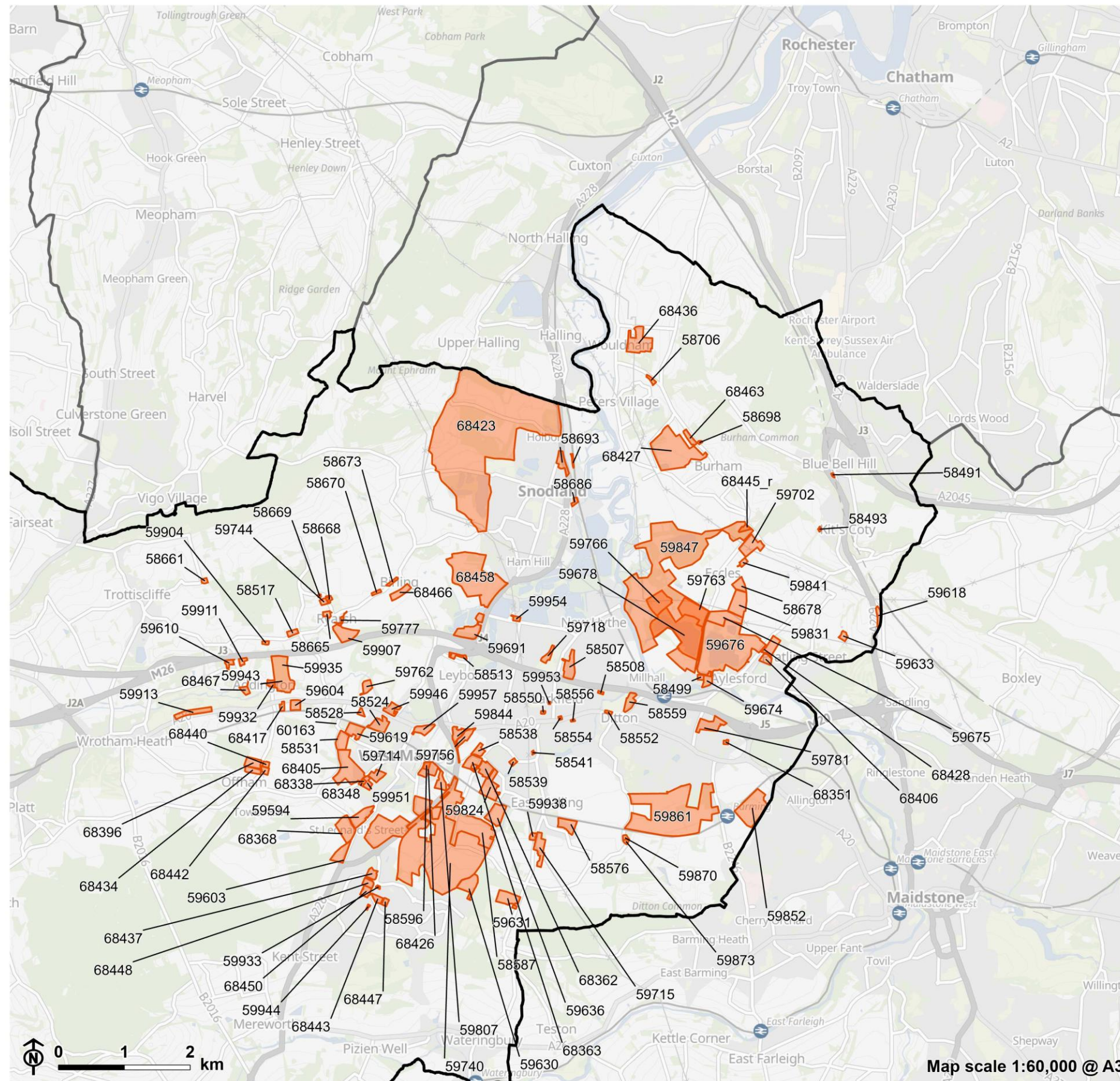


Figure 5.3: Residential site options – south west section

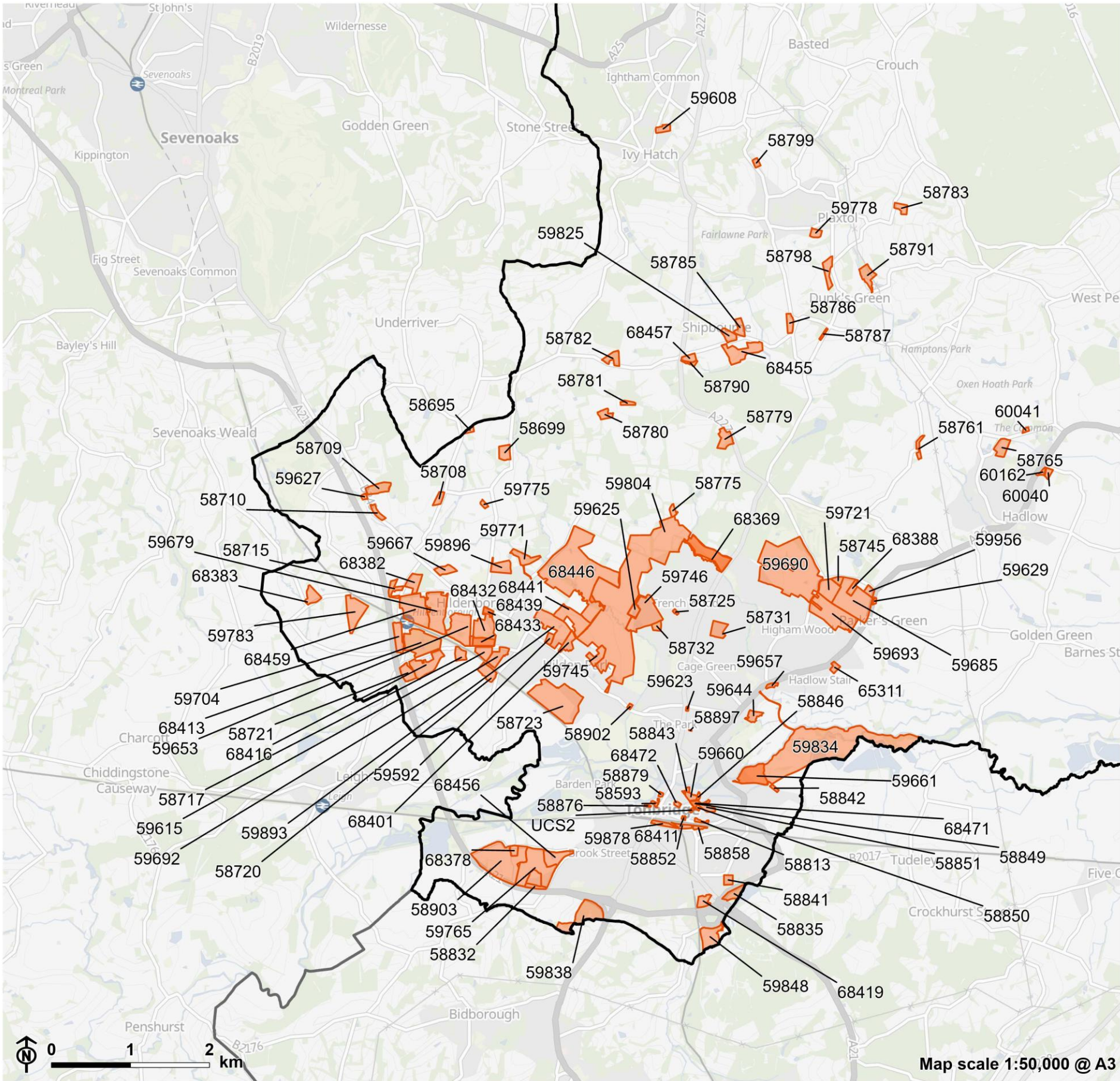
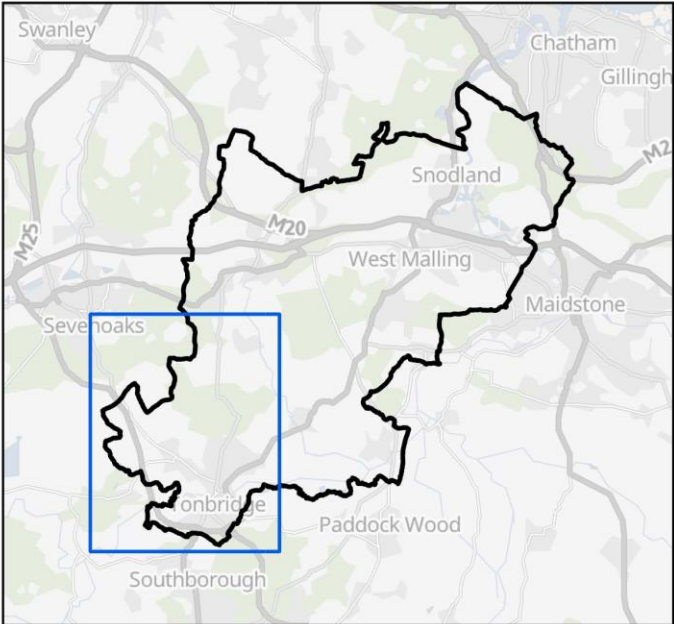


Figure 5.3: Residential site options - south
west section

- Tonbridge and Malling boundary
- Neighbouring local authority
- Site option
- Residential



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 Tonbridge and Malling boundary
 Neighbouring local authority
Site option
 Residential

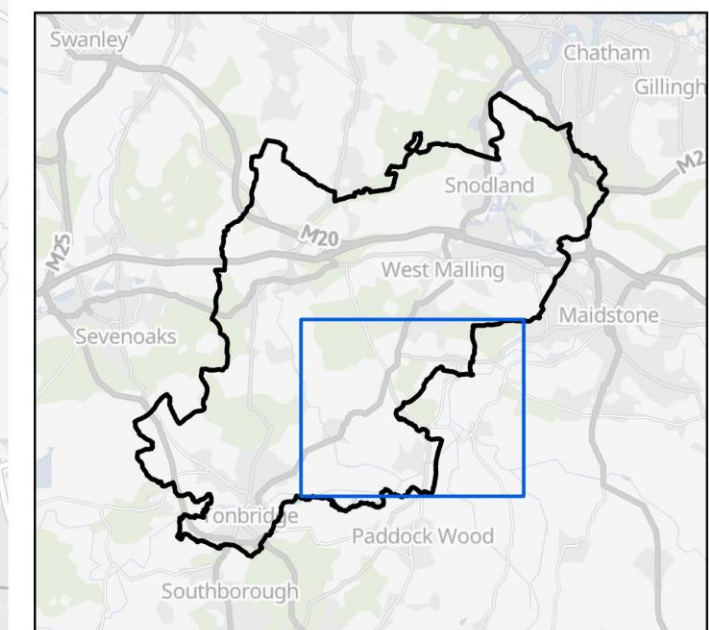
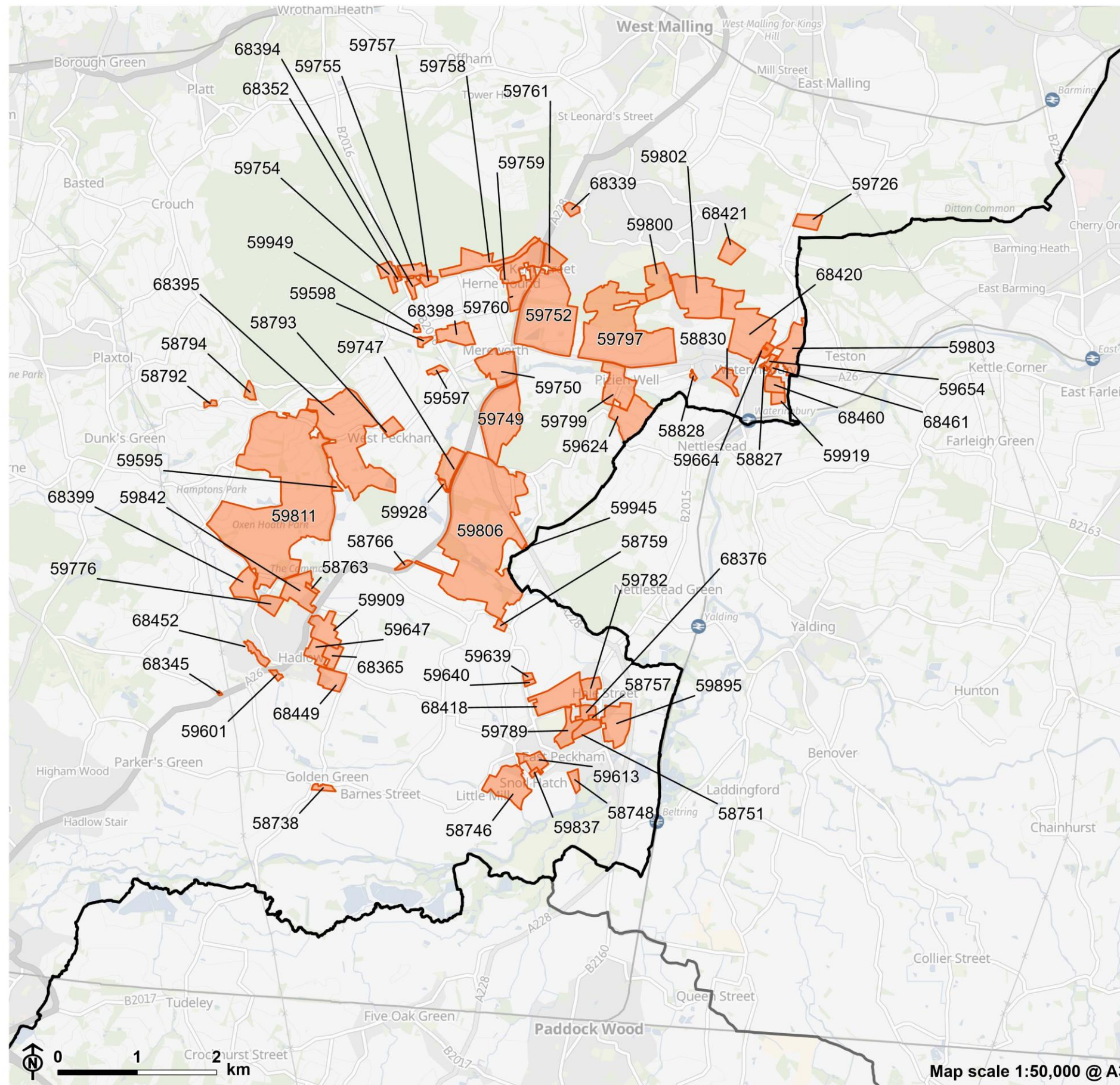
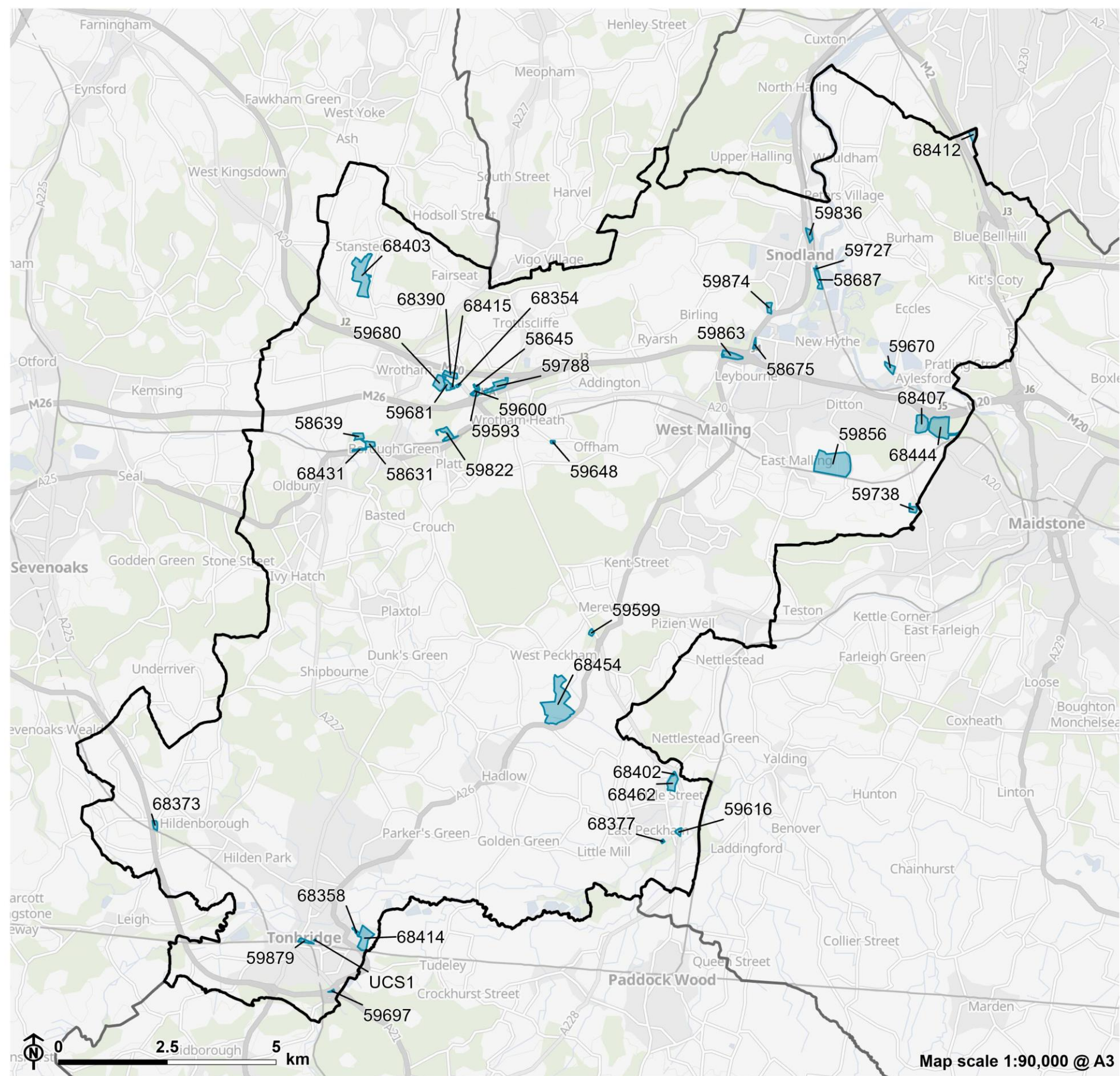


Figure 5.5: Employment site options



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Figure 5.5: Employment site options

 Tonbridge and Malling boundary

 Neighbouring local authority

Site option

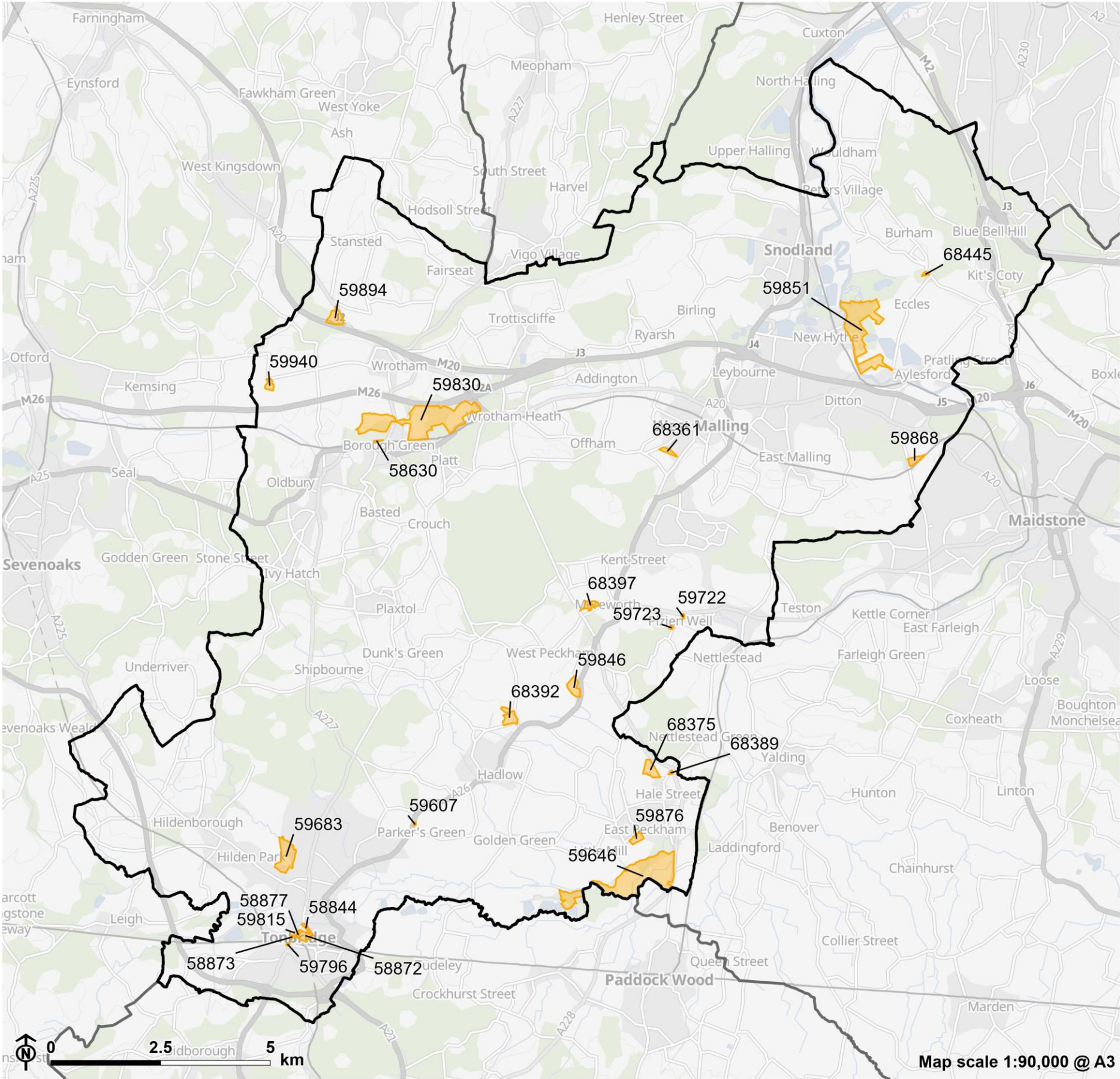
Employment

Figure 5.6: Mixed use site options



Figure 5.6: Mixed use site options

- Tonbridge and Malling boundary
- Neighbouring local authority
- Site option
 - Mixed use



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Chapter 6

Sustainability Appraisal findings for the Regulation 18 Draft Local Plan

6.1 This chapter presents the SA findings for the policies contained in the Regulation 18 Draft Local Plan.

6.2 The appraisal findings for the policies are grouped together by the chapters of the Local Plan, and for each group of policies a table is provided summarising the likely sustainability effects of each policy on each SA objective. Text is provided below each table explaining the reasoning behind the effects identified. Unless otherwise stated, the effects are assumed to be long-term and permanent.

6.3 A number of recommendations were made throughout plan preparation, where changes could be made to the policies to strengthen positive effects and mitigate any negative effects identified. These recommendations are listed at the end of the chapter along with the Council's response to each.

Vision and objectives

6.4 The Local Plan vision covers the period from 2024 up to 2042, and is as follows:

By 2042 the borough will be more resilient to the impacts of climate change through high quality, efficient, well-located, low-carbon development. New developments will have taken a long-term view towards effective management of climate impacts, including flooding and hot weather, making use of nature-based solutions such as SUDS, green and blue infrastructure, design and materials including circular economy principles: to provide resilient, thriving, beautiful places to live, learn, work and play.

The design of new and refurbished buildings will respect our diverse local character and heritage and will have become examples of high-quality design for West Kent. The widely rural nature of the borough, with its network of small towns and villages will have been sustained, with valued open spaces and landscapes enhanced, supporting local nature recovery and biodiversity net gain.

Sustainable communities will have been supported through focussing housing delivery on the borough's urban locations, whilst maintaining the viability of smaller settlements with appropriately sized growth. Housing delivery will be prioritised to ensure that previously developed land is utilised, whilst it is acknowledged that this alone will not provide sufficient land to meet identified housing and employment needs. The borough's residents will benefit from a more diverse housing supply to meet all types of need and affordability, together with the social, digital and physical infrastructure needed to support them. Existing accessibility and inequality challenges will have been addressed through the provision of new quality homes, appropriate infrastructure and facilities.

The vibrancy and attractiveness of Tonbridge town centre will have been enhanced as a destination and a place to enjoy for local people and visitors. New developments will have delivered the regeneration of the Angel Centre and adjacent sites East of the High Street, with a new leisure, retail and employment offer, alongside new homes. Growth and investment opportunities in the logistics sector will have been supported, providing new employment opportunities for residents. This growth alongside the heritage offer and access to green spaces and the wider countryside, will be attracting new visitors to the borough. New employment opportunities will be extended across the borough at key sustainable locations.

Transport and infrastructure improvements alongside initiatives to reduce the need to travel and the provision of active and sustainable travel choices will have enhanced community health and well-being and contributed towards reduced harmful emissions.

6.5 The vision is supported by seven plan objectives:

- **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.
- **Objective 2** – Protect and enhance our built and natural environment with new development ensuring high quality design including respecting our valued landscapes and historic environment and delivering net gains in biodiversity.
- **Objective 3** – Provide sufficient numbers of homes of a high quality, range and standard to meet our community's needs.

- **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.
- **Objective 5** – Maintain a thriving economy with an enhanced range of premises in which businesses can grow and invest to support employment opportunities.
- **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.
- **Objective 7** – Prioritise sustainable transport and active travel options alongside the timely delivery of required physical and digital infrastructure to support growth.

6.6 Table 6.1 below presents the sustainability effects for the vision and objectives in relation to the SA objectives, with the findings described below the table.

Table 6.1: SA findings for the vision and objectives

SA objective	Vision	O1	O2	O3	O4	O5	O6	O7
SA1: Health and well-being	+	0	0	0	++	0	0	+
SA2: Services and facilities	+	0	0	0	+	0	++	0
SA3: Education	+	0	0	0	0	0	0	0
SA4: Economic growth	+	0	-?	0	0	++	+	+
SA5: Biodiversity and geodiversity	+	0	++	-?	-?	-?	-?	0
SA6: Landscape and townscape	+	0	++	-?	-?	-?	-?	0
SA7: Historic environment	+	0	++	-?	-?	-?	-?	0
SA8: Water	+	0	0	-?	-?	-?	-?	0

SA objective	Vision	O1	O2	O3	O4	O5	O6	O7
SA9: Soils	+	+	0	-	-	-	-	0
SA10: Climate change mitigation	+	++	0	0	0	0	0	++
SA11: Climate change adaptation	+	++	0	0	0	0	0	0
SA12: Pollution	+	0	0	0	0	0	0	+
SA13: Waste	+	+	0	0	0	0	0	0
SA14: Housing	+	0	-	++	0	0	0	0

Vision

6.7 The vision for Tonbridge and Malling Borough sets out a general ambition for development to take place in a sustainable way, embracing a mix of environmental, social and economic aspirations. This will enable the borough to be an attractive place to live, work and invest. The vision also reflects to a degree the Climate Emergency declared by Tonbridge and Malling Borough Council in July 2019, with reference to its ambition to become more resilient to the impacts of climate change by 2042.

6.8 If the vision is achieved, it can be expected to lead to minor positive effects in relation to the following SA objectives.

- SA objective 1: Health and well-being, because the vision aims to integrate social, digital and physical infrastructure alongside a diverse housing supply, primarily to enhance residents' health and well-being. The vision articulates the support for and enhancement of valued open spaces, the landscape and townscape, and local nature recovery and biodiversity net gain – all of which have mental and physical health benefits. The vision also refers to infrastructure improvements that will promote active travel choices, which have the potential to encourage walking and cycling with beneficial effects on health and well-being. Furthermore, it envisages a more vibrant and attractive town centre in Tonbridge, making this a place where residents can enjoy themselves, with the associated positive effects on their well-being.

- SA objective 2: Services and facilities, because the regeneration of the Angel Centre and adjacent sites, located east of the High Street, will enhance the retail, leisure and employment offer, thereby improving the range of services and facilities available in the area. The provision of active and sustainable travel choices will also ensure easy access to services and facilities.
- SA objective 3: Education, because the vision refers to the provision of infrastructure and facilities, including social, digital and physical infrastructure. This could include educational facilities and so could improve access to education.
- SA objective 4: Economic growth, as the vision embraces growth and investment opportunities around the logistical sector together with an improved retail and employment offer in Tonbridge Town Centre. It also states that employment opportunities will be extended across the borough at key sustainable locations and where opportunities exist.
- SA objective 5: Biodiversity and geodiversity, because the vision seeks to utilise nature-based solutions together with green and blue infrastructure, while also supporting local nature recovery and biodiversity net gain, thereby contributing to the preservation and restoration of biodiversity and geodiversity.
- SA objective 6: Landscape and townscape, because the vision supports building design which respects local character and seeks to enhance valued open spaces and landscapes.
- SA objective 7: Historic environment, because the vision supports building design which respects heritage.
- SA objective 8: Water, because the vision aims to successfully respond to climate change through new developments which take on a long-term view towards effective management of climate impacts, including flooding through recognised approaches such as SuDS. This will help mitigate flood risk and protect water quality.
- SA objective 9: Soils, because the vision focuses housing delivery in the borough's urban locations, helping to preserve greenfield land and protect

best and most versatile agricultural land. It reinforces this by seeking to ensure that previously developed land is utilised.

- SA objective 10: Climate change mitigation, as the vision aims to decrease greenhouse gas emissions in the borough by promoting low-carbon development and sustainable, active travel options that will reduce dependence on private cars. It also supports the circular economy whereby products and materials are kept in circulation, thereby helping to reduce embodied carbon.
- SA objective 11: Climate change adaptation, as the vision seeks to ensure that the borough is more resilient to the impacts of climate change through a long-term approach to effective management of climate impacts, including management of flooding and hot weather, and the utilisation of nature-based solutions and green and blue infrastructure, alongside sustainable design.
- SA objective 12: Pollution, because the vision seeks to reduce the need to travel through the provision of active and sustainable transport choices, and this is likely to reduce reliance on the private car and associated air pollution. Also, with the focus of growth being in the borough's urban locations, this will reduce the need to travel for much of the population.
- SA objective 13: Waste, because the vision refers to circular economy principles which will reduce waste while also helping to mitigate carbon emissions associated with the built environment.
- SA objective 14: Housing, because the vision seeks to support sustainable communities through accommodating housing growth across the borough, and ensuring the delivery of a diverse housing supply, including affordable homes, to meet the needs of existing and new residents.

6.9 All of the effects of the vision are subject to some uncertainty since it is very high level and the effects will depend on the details of the Local Plan policies and site allocations which are designed to implement it.

Objectives

6.10 Objective 1 sets out the Council's approach to addressing the Climate Emergency by ensuring that development makes a significant contribution to

the delivery of net zero status by 2050, mitigating and improving resilience to climate change in the borough. Therefore, significant positive effects are expected in relation to SA objectives 10: Climate change mitigation and 11: Climate change adaptation. Minor positive effects are expected in relation to SA objectives 9: Soils and 13: Waste as Objective 1 seeks to utilise land and materials efficiently.

6.11 Objective 2 is expected to have significant positive effects in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape and 7: Historic environment, as it aims to protect and enhance the built and natural environment, ensuring that new developments are of high-quality design, including respecting valued landscapes and the historic environment. Potential but uncertain minor negative effects are identified against SA objectives 4: Economic growth and 14: Housing, as there are some potential conflicts between Objective 2 seeking to protect the built and natural environment and these SA objectives, which support growth (noting that SA objective 14: Housing does also promote high quality design).

6.12 Objective 3 is expected to have a significant positive effect in relation to SA objective 14: Housing, as it seeks to provide sufficient homes of a high quality, range, and standard to meet the diverse needs of the community. However, potential but uncertain minor negative effects are identified against the environmental objectives (SA objectives 5-9) as there are some potential conflicts between Objective 3 promoting development and these SA objectives, which seek to protect the environment.

6.13 Objective 4 is expected to have a significant positive effect in relation to SA objective 1: Health and well-being as the objective seeks to sustain and provide excellent social infrastructure to support community health and well-being, in addition to incorporating design principles that will assist in improving access and community safety. This is also likely to have a minor positive effect on SA objective 2: Services and facilities, due to the anticipated provision of high-quality and accessible social infrastructure. However, potential but uncertain minor negative effects are identified against the environmental objectives (SA objectives 5-9) as there are some potential conflicts between Objective 4 promoting development and these SA objectives which seek to protect the environment.

6.14 Objective 5 is expected to have a significant positive effect in relation to SA objective 4: Economic growth, as the objective promotes a thriving economy through an enhanced range of premises in which businesses can grow and invest to support employment opportunities. However, potential but uncertain

minor negative effects are identified against the environmental objectives (SA objectives 5-9) as there are some potential conflicts between Objective 5 promoting development and these SA objectives which seek to protect the environment.

6.15 Objective 6 is expected to have a significant positive effect in relation to SA objective 2: Services and facilities as the objective seeks to support and improve the range of services and facilities within Tonbridge and Malling Borough's towns and village centres to increase footfall and to meet growing and changing community and visitor needs. The objective also seeks to keep valued centres occupied and vibrant. A minor positive effect is also expected against SA objective 4: Economic growth as enhancing the vitality and vibrancy of the borough's town and village centres will help to support business activity and opportunities for local employment. However, potential but uncertain minor negative effects are identified against the environmental objectives (SA objectives 5-9) as there are some potential conflicts between Objective 6 promoting development and these SA objectives seeking to protect the environment.

6.16 Objective 7 aims to prioritise sustainable transport and active travel options and so is likely to have a significant positive effect in relation to SA objective 10: Climate change mitigation, as the encouragement of more sustainable modes of travel will reduce reliance on the private car and associated greenhouse gas emissions. Minor positive effects are also expected in relation to SA objectives 1: Health and well-being and 12: Pollution, as embracing sustainable and active modes of travel is likely to increase physical activity through walking and cycling, and minimise air pollution, which can otherwise cause poor health. Objective 7 also supports the delivery of physical and digital infrastructure to support growth and so is likely to have a minor positive effect in relation to SA objective 4: Economic growth.

Spatial strategy

6.17 This section presents the appraisals of the following spatial strategy policies within the Local Plan:

- Policy SP1: Spatial Strategy
- Policy SP2: Delivering Homes for our Communities
- Policy SP3: Settlement Hierarchy and General Development Principles

- Policy SP4: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs
- Policy SP5: Future Employment Growth
- Policy SP6: Town Centre Needs
- Policy SP7: Green Belt
- Policy SP8: Managing Development in the Green Belt
- Policy SP9: Local Green Gap

6.18 The likely effects of the policies in relation to each SA objective are shown in Table 6.2 and are described below the table.

Table 6.2: SA findings for the spatial strategy policies

SA objective	SP1	SP2	SP3	SP4	SP5	SP6	SP7	SP8	SP9
SA1: Health and well-being	++	0	+	0	+	0	+	+	+
SA2: Services and facilities	++	0	++	0	0	+	0	0	0
SA3: Education	0	0	0	0	0	0	0	0	0
SA4: Economic growth	++	0	0	0	++	++	0	-	0
SA5: Biodiversity and geodiversity	-	-?	+	-?	-?	0	+	+	+
SA6: Landscape and townscape	--/+	-?	+	-?	-?	0	++	++	++
SA7: Historic environment	--?	-?	0	-?	-?	0	0	0	0
SA8: Water	--	-?	0	-?	-?	0	0	0	0
SA9: Soils	--	-?	0	-?	-?	0	0	+	0
SA10: Climate change mitigation	+	0	+/-	0	0	0	0	0	0
SA11: Climate change adaptation	-	0	0	0	0	0	0	0	0

SA objective	SP1	SP2	SP3	SP4	SP5	SP6	SP7	SP8	SP9
SA12: Pollution	+	0	+/-	0	0	0	0	0	0
SA13: Waste	0	0	0	0	0	0	0	0	0
SA14: Housing	+	++	++	++	0	0	0	++/-	0

Policy SP1: Spatial Strategy

6.19 Policy SP1 directs the majority of growth in the borough to the most urban and sustainable settlements, such as Snodland, Kings Hill and Tonbridge, where access to healthcare, open spaces, and other key services and facilities is greatest. Retail and leisure development will also be concentrated in these locations, which will ensure that both new and existing residents benefit from convenient access to community amenities. By focusing growth around the best-connected areas with strong transport links and sustainable movement options, the policy supports healthier, more active lifestyles. The policy also establishes that Tonbridge Town Centre will remain the principal retail and service centre, with investment in public realm, active travel infrastructure, and redevelopment opportunities including new leisure and retail facilities delivering well-designed, accessible, mixed-use development to support the local community. This will ensure that new development is located where there is a wide range of key services and facilities, helping to provide residents with convenient access to leisure and retail facilities, supporting healthier, more active lifestyles. The policy also stipulates that district centres will continue to evolve as mixed-use locations with a focus on convenience retail, employment, and community services, while local centres across the borough will be protected and enhancements supported to ensure access to day-to-day services, particularly in rural areas. This will help to ensure equitable access to services and facilities in the borough. Therefore, the policy is expected to have significant positive effects in relation to SA objectives 1: Health and well-being, and 2: Services and facilities.

6.20 The policy supports economic growth in the borough by strengthening and diversifying its established economic base. The policy seeks to improve the range of job provision in key sectors including logistics, technology, and rural enterprise, while also safeguarding, expanding and regenerating strategic employment sites. This includes ensuring that office space is designed and configured to meet the evolving needs of businesses. The policy signposts that new site allocations and employment provision will be focused in sustainable locations, for example in the Medway Gap, East Malling, and Tonbridge, where strong transport links and access to a local workforce could reduce commuting distances and encourage more sustainable travel patterns. The policy also supports the growth of the rural economy, to ensure that the needs of land-based and other rural businesses can be achieved. As such, the policy is expected to have a significant positive effect in relation to SA objective 4: Economic growth.

6.21 The policy supports the delivery of sustainable communities that balance the provision of housing, employment, and infrastructure provision alongside flood risk, environmental, biodiversity, landscape, heritage and Green Belt protection. Growth is largely directed to the most urban and sustainable settlements, including the Medway Gap, Tonbridge, Kings Hill, and Snodland, where access to services, facilities, and sustainable transport options is strongest. However, Tonbridge and Malling is highly constrained in relation to sensitive biodiversity assets, particularly in the north-east of the borough, where a number of urban settlements are located close to sensitive and internationally designated biodiversity assets. These include the Holborough to Burham Marshes SSSI, the Wouldham to Detling Escarpment SSSI, the North Downs Woodland SAC, and Wagon's Pit RIGS and SSSI. Concentrating development in or around these areas could therefore place additional pressures on biodiversity and geodiversity, with the potential for adverse effects if mitigation is not effectively secured. Development within or in particular adjacent to the most urban and sustainable settlements, particularly in the north east of the borough (near Snodland and Burham) could therefore have the potential to cause adverse effects to sensitive biodiversity assets. The policy is therefore expected to have a minor negative effect overall in relation to SA objective 5: Biodiversity and geodiversity.

6.22 Policy SP1 supports the delivery of sustainable communities that balance the provision of housing, employment and infrastructure provision alongside flood risk, environmental, biodiversity, landscape, heritage and Green Belt protection. The policy focuses development predominantly within or adjacent to the most sustainable settlement across the borough, which may offer opportunities to make use of brownfield land. However, development has the potential to impact the setting of the Kent Downs National Landscape which is situated along the northern, eastern and western boundaries of the borough, and the High Weald National Landscape which covers a small area along the southern edge of the borough. Additionally, the borough is extensively covered by the Metropolitan Green Belt. While the policy confirms that any release of Green Belt land will be limited to the most sustainable locations in accordance with the settlement hierarchy, substantial development in these areas has the potential to compromise the openness and distinct identity of rural and semi-rural areas and increase the risk of settlement coalescence. Additionally, although the policy notes that the housing requirement will be met in a way that maximises development on suitable previously developed/brownfield sites, it stipulates that due to the limited supply of previously developed land in the borough, greenfield sites have been identified in a number of sustainable locations to meet the borough's development needs. This includes a number of large edge-of-settlement strategic sites, which will not only deliver new homes

and jobs but also contribute to new and improved infrastructure to support both existing and future communities. The policy does seek to safeguard settlement character and distinctiveness, with specific protections in place for Kings Hill, the Medway Gap settlements, East Malling, Mill Street, and West Malling, through the identification of a Local Green Gap to prevent inappropriate development and to retain settlement identity. As such, the policy is expected to have a mixed minor positive and significant negative effect in relation to SA objective 6: Landscape and townscape.

6.23 The policy supports the delivery of sustainable communities that balance the provision of housing, employment and infrastructure provision alongside flood risk, environmental, biodiversity, landscape, heritage and Green Belt protection. However, all new development has the potential to have an impact on the historic environment, both directly and indirectly, for example if the appearance of the development were to detract from the setting of a heritage asset. The extent of these effects will depend heavily on the design, scale, and layout of individual proposals, and whether opportunities are taken to integrate or enhance the historic environment within new development. Heritage assets are spread relatively evenly across the borough, with notable concentrations in Snodland, Tonbridge and Aylesford, these being sustainable settlements where growth is supported by the policy. There is therefore a risk of cumulative pressure on heritage assets in these locations. A potential significant negative effect is therefore identified against SA objective 7: Historic environment.

6.24 The policy focuses the majority of growth within or adjacent to the most urban and sustainable settlements, such as Snodland, West Malling, Tonbridge, and the Medway Gap. Significant development would therefore be adjacent to the River Medway and its tributaries where there is a high probability of flooding from rivers and seas, as well as risk of surface water flooding. Source Protection Zones (SPZs) 2 and 3 are also present in the north-east of the borough, particularly around East Malling and Snodland, where groundwater is abstracted for public water supply. The policy is therefore expected to have a significant negative effect in relation to SA objective 8: Water.

6.25 Policy SP1 supports meeting the housing requirement of the borough in a way that maximises development on suitable previously developed land/brownfield sites. The policy also focuses development predominantly within or adjacent to the most urban and sustainable locations across the borough, which may offer opportunities to make use of brownfield land. However, it also stipulates that due to the limited amount of previously developed land in the borough, greenfield sites have been identified in sustainable locations to meet development needs. Much of Tonbridge and Malling comprises Grade 3

agricultural land, with areas of Grade 1 agricultural land in the central areas of the borough and substantial areas of Grade 2 agricultural land in the north-east and east of the borough. Therefore, growth within or adjacent to the most urban and sustainable locations (particularly locations such as West Malling and Snodland), including on greenfield sites, is likely to intersect with areas of Grade 3, Grade 2, and Grade 1 agricultural land. A significant negative effect is therefore expected in relation to SA objective 9: Soils.

6.26 The policy seeks to encourage sustainable movement, stipulating that the majority of growth will be focused within or adjacent to the most sustainable settlements, including Tonbridge, Kings Hill, Borough Green, Snodland and Aylesford, which are the locations best served by sustainable transport, including frequent bus services. This will help to reduce commuting distances and support sustainable travel patterns. This will also help to reduce the need to travel by car, which will reduce greenhouse gas emissions through reduced fuel consumption and trip generation, and address local air pollution associated with traffic. In relation to district centres, the policy supports their continued evolution as mixed-use locations, enabling people to live closer to employment opportunities, services, and community facilities. This is complemented by requirements for development to promote walkability and integration with surrounding residential areas, making it easier for residents to choose active travel modes. This approach will help to reduce reliance on private vehicles, as residents will have good access to active travel options which could encourage modal shift. Additionally, local centres across the borough will be protected and enhancements supported to ensure access to day-to-day services, particularly in rural areas. This could help to limit long car drives to reach essential services and facilities for those in rural areas. As such, minor positive effects are expected for the policy in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

6.27 Policy SP1 promotes development in urban areas, towns and larger settlements, some of which are prone to flood risk, particularly when considering the predicted effects of climate change. This concentration of growth could increase the vulnerability of new development to flooding events, particularly as climate change is expected to increase the frequency and severity of such events over the plan period, particularly towards the end of the plan period. The policy is therefore expected to have a minor negative effect against SA objective 11: Climate change adaptation.

6.28 The policy supports the borough's housing need requirement in a way that maximises development on suitable previously developed land/brownfield sites. However, given the limited amount of previously developed land in the borough,

greenfield sites have been identified in sustainable locations to meet development needs. This includes a number of 'edge of settlement', large strategic development sites that can be developed for housing and employment as well as help to deliver infrastructure to support both new and existing communities. A minor positive effect is therefore expected against SA objective 14: Housing.

Policy SP2: Delivering homes for our communities

6.29 Policy SP2 sets out a requirement for a minimum of 19,746 new homes to be delivered across the plan period between 2024-2042, with an annual target of 1,097 dwellings. This provision will help to ensure that future housing needs are fully met. The scale of growth will also provide an opportunity to deliver a range of housing sizes, types and tenures. Housing delivery will be supported in accordance with the spatial strategy and the site allocations set out within the Plan (and any further 'Made' Neighbourhood Plans) including sustainable settlements as defined by settlement boundaries. Additionally, small-scale development will be supported, which will help to strengthen the local supply of housing. The policy is therefore expected to have a significant positive effect against SA objective 14: Housing.

6.30 Potential minor negative effects have been identified in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment, 8: Water and 9: Soils due to the scale of housing development proposed by the policy, which could have adverse environmental effects. Some of these would be short-term and temporary effects during construction while others would be long-term and permanent. However, this is uncertain based on only the total number of homes to be provided and not their location, which is appraised under other policies.

Policy SP3: Settlement Hierarchy and general development principles

6.31 Policy SP3 supports development, in addition to allocations proposed within the plan, within sustainable settlements as defined by the settlement hierarchy. This includes Tier 1 – Tier 4 settlements. The focus of new housing, employment and commercial growth and associated infrastructure in locations with existing services, infrastructure, and sustainable travel opportunities, rather than in less accessible areas of the countryside, is likely to ensure that residents within any development that comes forward will have access to key

services and facilities. Limited residential development, either within (infill) or directly adjacent (limited frontage development) to Tier 5 settlements may be considered acceptable on the basis of supporting the continued sustainability of the settlement. This is likely to help maintain the viability of existing services and these locations. As such, a minor positive effect is expected in relation to SA objectives 1: Health and well-being and 2: Services and facilities.

6.32 By supporting higher levels of residential development within sustainable settlements as defined by the settlement hierarchy and limiting the potential for development outside settlement boundaries, the policy may encourage increased use of previously developed land. This approach should help to reduce impacts on the natural environment. Therefore, a minor positive effect is identified for the policy in relation to SA objectives 5: Biodiversity and geodiversity.

6.33 The policy stipulates that areas outside of the defined settlement boundaries will be protected and will be considered to be countryside for planning purposes, unless development is supported by a specific policy referenced in the plan or elsewhere. By restricting development in these areas, the policy will help to safeguard the character, openness, and visual quality of the borough's rural landscapes. Very limited residential development in Tier 5 settlements may be acceptable where it supports the continued sustainability of the settlement. The policy sets out clear criteria, requiring development to take into account its countryside location in relation to design, thereby ensuring that the scale and character of development is keeping with the settlement. This approach will help to conserve the landscape and minimise visual impacts. The policy is therefore expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape.

6.34 Policy SP3 supports development within sustainable settlements as defined by the settlement hierarchy (Tier 1-4 settlements), where development can facilitate or benefit from active travel and the use of public transport. However, the policy does support some development in smaller rural settlements, including Tier 4 settlements such as Burham, Eccles, and Wrotham, and some limited residential development in Tier 5 settlements such as Wrotham Heath and Dunks Green, which have limited access to public transport and so could result in a higher reliance on private vehicles. The policy stipulates that such development must provide suitable and safe vehicular access to the site, including the provision of footpaths, which could help maintain access to local services by active transport. However, the need for vehicular access also reflects a likely reliance on private cars in these settlements, which could increase traffic, greenhouse gas emissions, and local

air pollution. Additionally, development may increase the number of cars on the road and associated air pollution, in addition to greenhouse gas emissions. This is particularly important, as a number of Air Quality Management Areas (AQMAs) are located closer to settlements towards the top of the settlement hierarchy, such as Tonbridge and Borough Green, making them more susceptible to the negative impacts of increased traffic. Therefore, mixed minor positive and minor negative effects are expected in relation to SA objectives 10: Climate change mitigation and 12: Air pollution.

6.35 The policy promotes development within the sustainable settlements as defined by the settlement hierarchy. Higher-tier settlements such as Tonbridge, Snodland and Borough Green are likely to be better supported by existing infrastructure and services, making them particularly suitable for accommodating higher levels of population growth. Additionally, the focus on these areas and to a lesser extent limited rural development will allow a slightly more balanced distribution of housing. The policy is therefore expected to have a significant positive effect on SA objective 14: Housing.

Policy SP4: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs

6.36 Policy SP4 supports the provision of pitches for Gypsies and Travellers and plots for Travelling Showpeople, ensuring that the identified accommodation needs of these groups within the borough are met up to 2042. This is expected to have a significant positive effect in relation to SA objective 14: Housing, by ensuring that their accommodation needs are met.

6.37 As with policy SP2, potential negative effects have been identified in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment, 8: Water and 9: Soils due to the potential for the development of pitches to have adverse environmental effects. Some of these would be short-term and temporary effects during construction while others would be long-term and permanent. However, this is uncertain based on only the principle of meeting the identified needs and not the specific location of pitches.

Policy SP5: Future Employment Growth

6.38 Policy SP5 stipulates that the Council will seek to meet the identified employment needs in full. At a minimum 301,000sqm of B2 and B8 and 60,500sqm of office space will be provided over the plan period, by allocating

sites (appraised separately under Policy A1), delivering existing commitments, retaining existing premises and other measures. The availability of accessible job opportunities will help improve access to work for local residents, supporting economic stability and contributing to overall health and wellbeing. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.39 The provision and retention of industrial and office floorspace to meet the identified need will help ensure that both current and future employment requirements are met, supporting economic stability. As such, the policy is expected to have a significant positive effect against SA objective 4: Economic growth.

6.40 Potential minor negative effects have been identified in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment, 8: Water and 9: Soils due to the scale of economic development proposed by the policy, which could have adverse environmental effects. Some of these would be short-term and temporary effects during construction while others would be long-term and permanent. However, this is uncertain based on only the total amount of employment floorspace to be provided and not the location, which is appraised under other policies.

Policy SP6: Town Centre Needs

6.41 Policy SP6 seeks to meet the identified retail floorspace need of 18,250sqm over the plan period by through existing commitments, vacant units / reoccupation of space and through new local centres within strategic allocations to support new communities. This will help to support the vitality and function of the town, service and local centres across the borough, ensuring that communities continue to have convenient access to a broad range of facilities. The policy is therefore expected to have a minor positive effect against SA objective 2: Services and facilities.

6.42 The policy is expected to have a significant positive effect against SA objective 4: Economic growth as by meeting identified retail floorspace needs, the policy ensures that there is sufficient capacity to address the needs of the retail sector over the plan period and to support the vitality and viability of town centres (assuming that the majority of retail growth is directed to these locations).

6.43 As development resulting from this policy would be in town centres, and no new sites are being allocated for retail, negative effects on biodiversity, landscape etc. are not considered likely to result.

Policy SP7: Green Belt

6.44 Policy SP7 supports the beneficial use and management of land in the Green Belt, particularly where it protects and enhances the wider blue-green infrastructure network, as set out in the Green and Blue Infrastructure Strategy. By safeguarding these natural areas, the policy will support people's health and well-being by maintaining access to nature and recreational opportunities. It will also support biodiversity by preserving important habitats and ecological connectivity. The policy is therefore expected to have minor positive effects in relation to SA objectives 1: Health and well-being and 5: Biodiversity and geodiversity.

6.45 The Green Belt's primary function is to prevent urban sprawl and therefore by protecting the Green Belt from inappropriate development, the policy will help to maintain a clear distinction between urban and rural areas and help to ensure that development respects and maintains the visual and spatial quality of Tonbridge and Malling Borough's landscapes. Additionally, the policy supports the beneficial use and management of land in the Green Belt, particularly where it is consistent with the essential characteristics of openness and permanence of the Green Belt. As such, the policy is expected to have a significant positive effect in relation to SA objective 6: Landscape and townscape.

Policy SP8: Managing Development in the Green Belt

6.46 Policy SP8 seeks to limit inappropriate development within the Green Belt, setting out several 'Golden Rules' for major housing proposals on Green Belt land. These include the provision of new, or improvements to existing green spaces that are currently accessible to the public, and measures to protect and enhance the current green and blue infrastructure of the borough. This is expected to have a minor positive effect in relation to SA objective 1: Health and well-being by increasing opportunities for residents to partake in outdoor recreation, encouraging active lifestyles, and improving access to nature, all of which can benefit both physical and mental health.

6.47 A minor positive effect is also expected for the policy in relation to SA objective 5: Biodiversity and geodiversity as the protection and enhancement of

current green and blue infrastructure in the borough as part of contributions for major residential development in the Green Belt will help conserve and create habitats and strengthen ecological networks. This is reinforced by the policy also stipulating that where land is identified as having particular potential for habitat creation or nature recovery within the Kent and Medway Nature Recovery Strategy, green space proposals should contribute to these outcomes.

6.48 The policy requires the Green Belt to be protected against inappropriate development in line with national policy. Therefore, the policy prevents some development from taking place in the Green Belt. Preventing development could have adverse effects on the economy and so a minor negative effect is expected in relation to SA objective 4: Economic growth. The policy resists inappropriate development within the Green Belt, in accordance with national planning policy. The policy stipulates that appropriate development within the Green Belt will be permitted subject to meeting several criteria to limit the scale of development in order to maintain the openness and character of the Green Belt. Criteria includes the siting, scale, height, and bulk of proposals that must be sympathetic to, and compatible with, the primary aim of preserving its openness. Developments must also demonstrate a high standard of design and landscaping and take all necessary measures to minimise their visual impact on the wider Green Belt. This will help to ensure that development in the Green Belt does not have a harmful effect on its character, and as such the policy is expected to have a significant positive effect in relation to SA objective 6: Landscape and townscape.

6.49 The policy states that major residential developments proposed on Green Belt land must provide 50% affordable housing, which will help to meet the needs of specific local groups. Therefore, a significant positive effect is expected in relation to SA objective 14: Housing. However, this effect is coupled with a minor negative effect as all proposals will also be subject to a Green Belt Assessment, which may limit the scale of development.

Policy SP9: Local Green Gap

6.50 Policy SP9 designates a Local Green Gap between the settlements of Kings Hill, West Malling and the Medway Gap (including East Malling and Mill Street) in the north-east of the borough. The designation of a Local Green Gap is expected to have a minor positive effect in relation to SA objective 1: Health and well-being by providing an access point from these urban settlements to the open countryside. This could encourage forms of outdoor recreation, supporting

physical activity and opportunities for relaxation. The policy also places strict conditions on development within the Local Green Gap, stipulating that Only proposals that demonstrably maintain the integrity of the gap will be supported, and that such proposals must contribute positively to the landscape, biodiversity or recreational value of the area. By safeguarding the Local Green Gap for recreational purposes such as walking and cycling, the policy reinforces the role of the Local Green Gap as a community asset.

6.51 A minor positive effect is expected against SA objective 5: Biodiversity and geodiversity due to the strict conditions imposed on development in the Local Green Gap, with proposals required to positively contribute to biodiversity. This will help to protect and enhance the ecological value of the Local Green Gap

6.52 The designation of the green gap is made with the primary purpose of retaining the existing settlement pattern and retaining openness, also protecting against coalescence. A significant positive effect is therefore expected in relation to SA objective 6: Landscape and townscape, as these spaces contribute to the local character of the borough and sense of place, as well as prevent the merging of neighbouring settlements, and thus by protecting such spaces, the policy helps to maintain the distinctive landscape qualities of the borough.

Climate change

6.53 This section presents the appraisals of the following Local Plan policies:

- Policy CC1: Strategic Climate Change
- Policy CC2: Circular Economy
- Policy CC3: Sustainable Design and Construction
- Policy CC4: Energy and Heating
- Policy CC5: Renewable and Low Carbon and Heat Projects
- Policy CC6: Water Efficiency
- Policy CC7: Managing Development within Flood Risk Areas
- Policy CC8: Sustainable Drainage Systems (SUDS)

6.54 The likely effects of the policies in relation to each SA objective are shown in Table 6.3 and are described below the table.

Table 6.3: Likely sustainability effects of the climate change policies

SA objective	CC1	CC2	CC3	CC4	CC5	CC6	CC7	CC8
SA1: Health and well-being	+	0	+	+	+	0	+	+
SA2: Services and facilities	+	0	0	0	0	0	0	0
SA3: Education	0	0	0	0	0	0	0	0
SA4: Economic growth	+	0	0	0	0	0	+	0
SA5: Biodiversity and geodiversity	+	0	+	0	+	0	0	+
SA6: Landscape and townscape	+	0	0	0	+	0	0	+
SA7: Historic environment	0	+	0	0	+	0	0	0
SA8: Water	+	0	+	+	+	++	++	++
SA9: Soils	+	++	+	0	+	0	0	0
SA10: Climate change mitigation	++	++	++	++	++	+	0	+
SA11: Climate change adaptation	++	0	++	0	0	0	++	++

SA objective	CC1	CC2	CC3	CC4	CC5	CC6	CC7	CC8
SA12: Pollution	+	+	0	+	+	+	0	0
SA13: Waste	+	++	+	0	0	0	0	0
SA14: Housing	0	0	0	0	0	0	0	0

Policy CC1: Strategic Climate Change

6.55 The overarching aim of Policy CC1 is to ensure that development proposals are designed, constructed and operated to effectively address climate change risks through mitigation and adaptation measures. The policy highlights a number of measures which will help to mitigate against climate change and also promote climate change adaptation and resilience. In terms of climate change mitigation, the policy promotes use of building types, shapes, materials and orientation that minimise energy consumption and maximise solar energy, opportunities to promote and deliver carbon sequestration and storage, including through tree planting, and promotes the re-use of previously developed land in sustainable locations with good infrastructure and transport links, helping to reduce emissions associated with private vehicles. In terms of climate change adaptation, this includes reducing overheating through passive design, incorporating SuDS, and reducing water use and increasing rain and grey water harvesting. The policy also specifically states that developments must contribute to net-zero through a holistic approach to design, construction, energy efficiency and on-site renewable energy generation to achieve as close to a net-zero energy balance as possible for the type of development. Major proposals must include an energy and climate change statement at the planning stage, demonstrating how these principles have been applied. The policy is therefore expected to have significant positive effects in relation to SA objectives 10: Climate change mitigation and 11: Climate change adaptation.

6.56 Policy CC1 seeks to ensure that new development demonstrates a proactive, best practice approach to mitigating climate change, contributes towards reducing greenhouse gas emissions and supports the transition to net-zero, and maximises the use of measures to adapt to climate change. The policy supports measures such as reducing reliance on private vehicles and promoting sustainable forms of travel including cycling and walking. This is likely to have a minor positive effect in relation to SA objective 1: Health and well-being as this will help to encourage more active lifestyles which benefits people's mental and physical health. The policy also supports mitigating flood risk through measures such as natural flood risk management, location and design of development, which can positively affect people's mental health by reducing anxiety and stress associated with flood risk. The policy also promotes the incorporation of green infrastructure into development, which will fulfil a range of functions relating to climate change adaptation, such as urban cooling, which will improve people's comfort and have positive effects on their mental

health and physical well-being. Addressing air pollution may help improve air quality, with associated positive effects on people's physical health.

6.57 The policy seeks to maximise the re-use of previously developed land and land in sustainable locations where there is supporting infrastructure in place and good access or connections to services, facilities and sustainable transport modes. This will help ensure residents have convenient access to essential services and facilities. Therefore, a minor positive effect is expected in relation to SA objective 2: Services and facilities. Additionally, by locating development in sustainable locations, which are often within towns, the policy has the potential to increase footfall, which will help to support the vitality and viability of town centres. A minor positive is therefore also expected against SA objective 4: Economic growth.

6.58 The policy is expected to have a minor positive effect against SA objective 5: Biodiversity and geodiversity as it encourages integrating green and blue infrastructure into developments, which will enhance, conserve and provide new habitats and wildlife. The policy also supports tree planting as appropriate, which will help to maintain biodiversity by providing new habitats for wildlife.

6.59 The policy supports sustainable development design that considers landscaping, density and layout. Additionally, it seeks to maximise the re-use and retrofitting of appropriate existing buildings which will help to retain their architectural character and in turn, preserve and maybe enhance the character of the townscape. Therefore, the policy is expected to have a minor positive effect on SA objective 6: Landscape and townscape.

6.60 The policy sets out measures to support climate change adaptation and resilience in new developments. These include mitigating flood risk and reducing its impact where possible through the design of new development, and the use of sustainable drainage systems to help store water and protect its quality. This will help to address flood risk management and protect and improve the quality and availability of water resources. A minor positive effect is therefore expected for the policy in relation to SA objective 8: Water.

6.61 The policy supports maximising the re-use of previously developed land and supporting the re-use and retrofitting of appropriate existing buildings and improvements to building standards. This will help to conserve and enhance soil resources by promoting the re-use of existing buildings and reducing the need for development on greenfield sites, which will help to support a more efficient use of land resources. As such, a minor positive effect is expected for the policy in relation to SA objective 9: Soils.

6.62 The policy is expected to have a minor positive effect in relation to SA objective 12: Pollution as it seeks to minimise light, water, air and noise pollution, and improve or maintain air and water quality. The policy also encourages the use of green infrastructure in new development and seeks to maximise opportunities to deliver carbon sequestration and storage including through tree planting. Increased vegetation can help absorb air pollutants and naturally filter and improve air quality in the borough.

6.63 The policy supports circular economy principles in new development, encouraging the re-use of building materials. This will promote the use of locally and sustainably sourced materials, and recycling of waste in construction and renovation. The policy also supports the retention, remodelling or refurbishment of existing buildings, and so will enable the re-use of existing building materials and in turn reduce construction waste. Therefore, the policy is expected to have a minor positive effect on SA objective 13: Waste.

Policy CC2: Circular Economy

6.64 Policy CC2 supports the incorporation of circular economy principles in new development. The policy requires all major development to demonstrate how they meet circular economy principles, including designing out waste and using systems, elements or materials that can be re-used and recycled. This will promote the use of locally and sustainably sourced materials, and recycling of waste in construction and renovation. The policy also supports the retention, remodelling or refurbishment of existing buildings, which will encourage the re-use of existing building materials and in turn reduce construction waste. The policy is therefore expected to have a significant positive effect in relation to SA objective 13: Waste.

6.65 The policy stipulates that all relevant development proposals should incorporate circular economy principles, prioritising the retention and refurbishment of existing building stock, which is an efficient use of existing buildings and prevents development on high quality soils. Further to this, the policy requires all major development to meet circular economy principles, notably building for longevity, adaptability or flexibility. This flexibility will help to reduce the need for replacement buildings, in addition to making efficient use of land. The policy is therefore likely to have a significant positive effect against SA objective 9: Soils.

6.66 The policy is also expected to have a significant positive effect in relation to SA objective 10: Climate change mitigation as the incorporation of circular economy principles in new developments, including the retention and re-use of

existing buildings and construction materials and working towards the goal of net-zero waste to landfill, will help to reduce embodied carbon, minimise resource consumption and lower greenhouse gas emissions associated with demolition, construction and waste disposal. The policy also stipulates that development will be designed to incorporate the retrofitting of low carbon and renewable energy and heat technology to existing buildings where feasible and viable, which will further support climate change mitigation efforts.

6.67 The policy stipulates that the change of use and conversion of historic buildings will be carried out in accordance with the Historic England Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency. This will ensure that the adaptation of historic buildings is implemented in a sensitive manner that preserves the historic significance of these assets. As such, the policy is expected to have a minor positive effect in relation to SA objective 7: Historic environment.

6.68 By prioritising the retention and refurbishment of existing buildings and promoting the recycling of materials, the policy will reduce the need for demolition and new construction and also reduce the transport of materials. This will help limit emissions associated with transport and construction and promote improved air quality. Therefore, the policy is expected to have a minor positive effect against SA objective 12: Pollution.

Policy CC3: Sustainable Design and Construction

6.69 Policy CC3 sets out that development should be designed to regulate the internal air quality and temperature of buildings and mitigate against potential overheating. New development will also be required to follow the cooling hierarchy, which prioritises passive design measures to minimise heat gain and effectively manage internal temperatures. These include reducing the amount of heat entering buildings through appropriate building form and fabric, orientation, shading and the incorporation of green infrastructure. This will help to enhance the overall quality of the indoor environment within buildings and help to support the health and comfort of users, which is likely to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.70 A minor positive effect is expected for the policy in relation to SA objective 5: Biodiversity and geodiversity, as the integration of green infrastructure into new development will help to enhance biodiversity by creating new habitats.

6.71 The policy supports development which demonstrates compliance with the principles of sustainable design and construction, to help mitigate and adapt to

the effects of climate change. In line with sustainable design and construction principles, development should aim to reduce use of water supplies and increase water recycling. This will help to reduce pressure on water resources, and therefore the policy is expected to have a minor positive effect against SA objective 8: Water.

6.72 The policy encourages the efficient use of land and natural energy sources, and conservation of on-site natural resources including vegetation, soil, water and materials. The protection of soil quality and efficient use of land is expected to contribute positively to SA objective 9: Soil by supporting long-term land productivity and minimising land degradation. The policy also supports development proposals that prioritise brownfield land and the re-use of existing buildings, structures and materials where available and feasible. This will also help to support more efficient use of land.

6.73 The policy is expected to have significant positive effects against SA objectives 10: Climate change mitigation and 11: Climate change adaptation as the central aim of the policy is to ensure that all new development contributes to climate change mitigation and adaptation through sustainable design and construction. The policy states that development proposals must demonstrate compliance with the principles of sustainable design and construction. This includes requiring developers to submit a Whole Life Cycle Carbon Assessment (WLCA) for all new major development. New development should also be constructed using low-embodied carbon and energy efficient materials, which will also help to reduce the carbon footprint of new development. Additionally, the policy stipulates that development should be designed to regulate the internal air quality and temperature of buildings, including through energy efficient design and provision of passive ventilation.

6.74 The policy is also expected to have a minor positive effect in relation to SA objective 13: Waste. The policy requires development to comply with the principles of sustainable design and construction, including minimising waste and reusing recycled materials during construction, in addition to designing for the re-use of materials. The policy also supports the retention, remodelling or refurbishment of existing buildings, and so will ensure the re-use of existing building materials and in turn reduce construction waste.

Policy CC4: Energy and Heating

6.75 Policy CC4 promotes the incorporation of energy efficiency measures from the outset of the design process and throughout construction and operation. This includes the requirement for new dwellings to be built to a minimum 3-star

standard or above of the Home Quality Mark (HQM) and for non-residential/commercial buildings to meet the BREEAM Very Good rating or higher. The HQM and BREEAM require buildings to be comfortable and ensure they are futureproofed against the effects of climate change. This is expected to have a minor positive effect in relation to SA objective 1: Health and well-being by creating healthier living environments.

6.76 The policy is expected to have a minor positive effect against SA objective 8: Water, as the policy requires new residential development to be built to a minimum 3-star standard or above of the HQM and new non-residential/commercial buildings to meet the BREEAM Very Good rating or higher. These building assessment methods both include categories which cover water use in buildings, including water efficiency and consumption, which will help to reduce overall water use in buildings.

6.77 Policy CC4 requires all development proposals to follow the energy hierarchy when developing their energy strategy. This approach must be clearly demonstrated within the Energy and Climate Change Statement, which will ensure that energy demand is reduced, energy is used efficiently and that renewable energy sources are prioritised. The policy also requires development to adopt a fabric-first approach, which will help to create more energy-efficient development. As such, the policy is expected to have a significant positive effect in relation to SA objective 10: Climate change mitigation.

6.78 The policy stipulates that new residential developments must be built to a minimum 3-star standard or above of the HQM, while new non-residential/commercial buildings must meet the BREEAM Very Good rating or higher. Both the HQM and BREEAM include criteria for managing indoor air pollutants, and therefore the enforcement of these standards will help to improve indoor air quality. The policy is therefore expected to have a minor positive effect against SA objective 12: Pollution.

Policy CC5: Renewable and Low Carbon and Heat Projects

6.79 Policy CC5 supports proposals for renewable and low carbon energy generation and distribution, stipulating that such proposals must consider potential impacts such as noise, shadow flicker, vibration and visual impacts, which includes glint and glare. It also stipulates that the physical and visual impacts of such development must not result in unacceptable harm to the local environment, including residential amenity, unless these impacts can be satisfactorily mitigated. This will help to minimise potential disturbances to nearby residents. The policy also states that major development proposals and

relevant proposals should demonstrate that effective engagement with stakeholders and communities has taken place to ensure that appropriate mitigation can be provided as required to make the development acceptable in planning terms. This will help to ensure that the concerns of local communities are considered. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.80 The policy is also expected to have minor positive effects on SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment and 8: Water, as it states that proposals for renewable and low carbon energy generating development and distribution networks will not be supported if the physical and visual impacts of the development result in an adverse impact on the local environment that cannot be satisfactorily mitigated. This includes landscape character, National Landscapes and their settings, biodiversity including habitats and species, geodiversity, flood risk and the historic environment. Further to this, the policy requires there to be a mechanism in place for the removal of infrastructure and restoration of sites, should facilities cease to be operational. These measures are expected to return the environment to how it was prior to development.

6.81 The policy is expected to have a minor positive effect in relation to SA objective 9: Soils, as it supports development proposals for renewable and low carbon energy generation and distribution networks where they utilise commercial and previously developed land/buildings (where available) and avoid the loss of significant areas of best and most versatile agricultural land. For proposals located on agricultural land, the policy encourages continued agricultural use, such as grazing, where this is proportionate to the scale and nature of the development. This will help to support the efficient use of land while maintaining soil function and agricultural productivity where possible.

6.82 The policy will directly support climate change mitigation by reducing reliance on fossil fuels and minimising greenhouse gas emissions through the delivery of renewable and low carbon energy sources, including heat network schemes and community-led energy schemes. The policy also stipulates that, where feasible, solar thermal energy will also be supported within new development. Additionally, developers are expected to maximise energy output by using the most efficient technologies, such as solar PV and smart energy systems, while ensuring proposals remain acceptable in planning terms. Where full compliance is not viable, developers must demonstrate how the policy has been met to the greatest extent possible. Therefore, the policy is expected to have a significant positive effect against SA objective 10: Climate change mitigation.

6.83 The focus of the policy on renewable and low carbon energy and distribution networks is likely to have a minor positive effect in relation to SA objective 12: Pollution, as these clean energy sources will help to reduce pollutants and their contributions towards poor air quality. The policy also seeks to protect neighbouring residents and local communities by requiring mitigation to limit noise and visual pollution associated with the construction and operation of renewable and low carbon heat projects.

Policy CC6: Water Efficiency

6.84 Policy CC6 is expected to have a significant positive effect in relation to SA objective 8: Water as the overarching aim of the policy is to minimise the consumption of water and maximise water efficiency in new development. The policy requires residential developments to achieve a maximum water use of 110 litres per person per day (or higher standards if applicable), and non-residential proposals to maximise water efficiency through mandatory measures. Additionally, applicants must demonstrate compliance using a water efficiency calculator or equivalent, submitted as part of their planning application. The policy also supports an integrated approach to water management, stating that proposals should demonstrate that water re-use, recycling and rainwater harvesting measures have been incorporated wherever possible to reduce demands on mains water supply.

6.85 A minor positive effect is also expected against SA objective 11: Climate change adaptation as the policy prioritises sustainable water management by minimising development's water impact and promoting efficient use of water resources. This will help to promote climate resilience and future water security by reducing strain on water resources.

Policy CC7: Managing Development within Flood Risk Areas

6.86 Policy CC7 provides stringent conditions for development proposed in areas identified as being at current or future risk of any source of flooding to ensure that such development mitigates flood risk and is resilient to potential flooding events. The policy stipulates that development proposals must be accompanied by a site-specific Flood Risk Assessment (FRA) which takes account of all sources of flooding and the current and future impacts of climate change as well as any residual risk. The FRA will also demonstrate that the development can be made safe for its lifetime, without increasing flood risk

elsewhere. The policy also requires measures to be incorporated to ensure that development proposals do not have any adverse effects on the capacity or water quality of any watercourses or floodplain. The policy is therefore expected to have a significant positive effect against SA objective 8: Water.

6.87 The policy also ensures developments incorporate flood resilient measures and residual management measures, which will help to protect infrastructure from the future effects of climate change. Furthermore, new development proposed in an area identified as being at current or future risk of flooding must meet the sequential test and where required, the exception test, considering all sources of flood risk and the current and future impacts of climate change. This will help to limit inappropriate development taking place within high flood risk areas. The policy is therefore expected to have a significant positive effect in relation to SA objective 11: Climate change adaptation.

6.88 Minor positive effects are likely in relation to SA objectives 1: Health and 4: Economic growth as the measures included in the policy will help to avoid the adverse effects of flooding on health and wellbeing, as well as the associated economic losses.

Policy CC8: Sustainable Drainage Systems (SuDS)

6.89 Policy CC8 provides guidance for the incorporation of SuDS in development proposals. The policy stipulates that SuDS should not increase flood risk off-site and adhere to design principles. This includes the careful siting of SuDS and safeguarding of visual and residential amenity, as well as the provision of multifunctional benefits for people, green infrastructure, water habitats and biodiversity. This will have positive effects on people's mental well-being, together with the fact there is a low risk of flooding and greener and more attractive environments encourage physical activity. Therefore, minor positive effects are expected in relation to SA objectives 1: Health and well-being and 5: Biodiversity and geodiversity.

6.90 The policy supports the use of SuDS to manage surface water runoff, stipulating that these systems should follow natural drainage flow paths and operate within the existing site topography. They should also be designed to provide multifunctional benefits for people, green infrastructure, water habitats and biodiversity. The use of SuDS in new development will be sensitively integrated into the environment, enhancing visual amenity and contributing to the natural character of the area. Therefore, a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.91 The overarching aim of the policy is to manage surface water runoff in new development through SuDS. SuDS must be implemented where development may affect drainage on or around the site and should be designed to prevent flooding during rainfall events up to (and including) a critical 1 in 30-year storm. Additionally, they must be able to accommodate the rainfall generated by events of varying durations and intensities up to (and including) the critical climate change adjusted 1 in 100-year storm (1% AEP). Therefore, a significant positive effect is expected in relation to SA objective 8: Water.

6.92 The policy stipulates that all development proposals which could affect drainage on or around the site must be accompanied with a scheme for the long-term maintenance and funding of the SuDS for the lifetime of the development. Effective SuDS implementation will reduce peak runoff rates and increase rain and stormwater storage during high rainfall events, thereby ensuring that developments are more resilient and adaptable to future climate change risk. Therefore, a significant positive effect is expected in relation to SA objective 11: Climate change adaptation.

Natural environment

6.93 This section presents the appraisals of the following Local Plan policies:

- Policy NE1: Conserving and Enhancing the Natural Environment
- Policy NE2: National Landscapes
- Policy NE3: Landscape Character
- Policy NE4: Designated Sites, Irreplaceable Habitat and Priority Habitat and Species
- Policy NE5: Biodiversity Net Gain
- Policy NE6: Green and Blue Infrastructure
- Policy NE7: Woodland, Trees and Hedgerows
- Policy NE8: Best and Most Versatile Agricultural Land
- Policy NE9: Noise, Vibration and Odour
- Policy NE10: Air Quality
- Policy NE11: Ground Contamination
- Policy NE12: Light Pollution

6.94 The likely effects of the policies in relation to each SA objective are shown in **Table 6.4** and are described below the table.

Table 6.4: Likely sustainability effects of the natural environment policies

SA objective	NE1	NE2	NE3	NE4	NE5	NE6	NE7	NE8	NE9	NE10	NE11	NE12
SA1: Health and well-being	+	0	0	+	0	+	+	0	+	+	+	+
SA2: Services and facilities	0	0	0	0	0	0	0	0	0	0	0	0
SA3: Education	0	0	0	0	0	0	0	0	0	0	0	0
SA4: Economic growth	0	0	0	0	0	0	0	+	0	0	0	0
SA5: Biodiversity and geodiversity	++	+	+	++/-	++	++	+	+	+	+	0	+
SA6: Landscape and townscape	++	++	++	0	0	+	+	+	+	+	0	+
SA7: Historic environment	0	+	+	0	0	+	+	+	+	+	0	+
SA8: Water	+	0	+	0	+	+	0	+	+	0	+	+
SA9: Soils	++	0	0	0	0	+	0	++	++	0	++	++
SA10: Climate change mitigation	+	0	0	+	+	+	+	+	+	0	0	+
SA11: Climate change adaptation	+	0	0	+/-	+	+	+	0	0	0	0	0
SA12: Pollution	+	+	0	+	+	+	+	0	++	++	++	++

SA objective	NE1	NE2	NE3	NE4	NE5	NE6	NE7	NE8	NE9	NE10	NE11	NE12
SA13: Waste	0	0	0	0	0	0	0	0	0	0	0	0
SA14: Housing	0	0	0	0	0	0	0	+	0	0	0	0

Policy NE1: Conserving and Enhancing the Natural Environment

6.95 Policy NE1 sets out the Council's commitment to protecting, conserving, and enhancing the natural environment. It promotes the conservation, restoration and enhancement of priority habitats, ecological networks, and green infrastructure. This is likely to have a minor positive effect in relation to SA objective 1: Health and well-being, as the policy will support improved mental health and physical well-being of the population by improving access to nature-rich, tranquil, clean and green spaces.

6.96 Policy NE1 is expected to have a significant positive effect in relation to SA objective 5: Biodiversity and geodiversity. Its overarching aim is to ensure that the natural environment is protected, conserved and enhanced, supporting proposals that prioritise the protection and improvement of biodiversity above other considerations. The policy also places emphasis on securing measurable net gains in biodiversity and seeks to ensure that development maximises opportunities to help deliver the Local Nature Recovery Strategy and provide wider environmental benefits. It also ensures that where harm cannot be avoided, the NPPF mitigation hierarchy is followed to minimise harm and enforce appropriate mitigation and/or enhancement measures.

6.97 Policy NE1 is also expected to have a significant positive effect against SA objective 6: Landscape and townscape as it seeks to ensure the positive conservation and enhancement of the Kent Downs and High Weald National Landscapes and their settings, in accordance with the relevant Management Plan. The policy also supports high-quality, well-designed, nature-based and landscape-led development that respects local character and fosters a strong sense of place.

6.98 The policy commits the Council to protecting, conserving, and enhancing the natural environment by ensuring that development does not worsen air, ground, water or light pollution, and by seeking opportunities to improve environmental quality in line with relevant guidance, action plans and frameworks. Policy NE1 is therefore expected to have a minor positive effect in relation to SA objective 7: Water, by limiting opportunities for water contamination and promoting measures to enhance water quality.

6.99 A significant positive effect is expected for the policy in relation to SA objective 9: Soils, as it seeks to minimise the loss of best and most versatile agricultural land (Grades 1, 2, and 3a) to major new development. The policy

also seeks opportunities to improve soil health and minimise disturbance to soils, which will help to protect soil biodiversity and carbon storage. As such, a minor positive effect is also expected in relation to SA objective 10: Climate change mitigation, as healthier soils contribute to increased carbon sequestration. Additionally, the policy's support for protecting and enhancing habitats and local ecosystems will further enhance the borough's carbon sequestration and storage.

6.100 The policy will have a minor positive effect against SA objective 11: Climate change adaptation, as the conservation, enhancement and protection of the natural environment, including green infrastructure and ecological networks, provides multiple benefits for climate adaptation, including reduced flood risk through healthier soils, increased shading during heat waves, and more resilient ecosystem services to future climatic shocks.

6.101 By enhancing green infrastructure and preserving natural habitats, the policy is expected to have a minor positive effect in relation to SA objective 12: Pollution, as vegetation helps to filter out air pollutants, and reduce particulate matter. Furthermore, the policy requires development to not contribute further towards adverse air pollution levels, or worsen light pollution, supporting overall improvements in air quality.

6.102 The measures set out in this policy could be seen as restrictive to development such as new housing; however, they will ensure that new development is high quality and appropriately sited. Negligible effects are therefore likely in this sense.

Policy NE2: National Landscapes

6.103 Policy NE2 will help to limit habitat fragmentation and loss by restricting the scale and extent of development within the Kent Downs and High Weald National Landscapes. The policy stipulates that development will only be supported where the nature of the development, location, siting, scale, form and design will conserve and enhance the components of natural beauty of the relevant National Landscape. This will help to protect the natural habitats and ecological networks of the National Landscapes. As such, a minor positive effect is expected in relation to SA objective 5: Biodiversity and geodiversity.

6.104 The policy is expected to have a significant positive effect in relation to SA objective 6: Landscape and townscape. Policy NE2 seeks to conserve and enhance the Kent Downs and High Weald National Landscapes, stipulating that all proposals within or affecting the setting of the respective National

Landscapes must conserve and enhance the natural beauty of the National Landscapes. Development must be compatible with furthering the purpose of a National Landscape, reflecting the character and features of the National Landscape and should be of high design quality. The policy also sets out stringent criteria for development within land that contributes to the setting of a National Landscape, ensuring it does not harm transitional landscape character, views, outlook, or sense of place.

6.105 A minor positive effect is expected for the policy against SA objective 7: Historic environment as development within the National Landscapes must conserve and enhance the components of natural beauty of the relevant National Landscape, including its distinctive landscape character and features, and historic settlement patterns.

6.106 Policy NE2 limits the scale and extent of development within the National Landscapes, stipulating that development will only be supported where the nature of development, location, siting, scale, form and design would conserve and enhance the components of natural beauty of the relevant National Landscape. This includes dark skies and tranquillity. A minor positive effect is therefore expected in relation to SA objective 12: Pollution, as the policy will limit light, noise and other forms of pollution, which could harm the quality of the National Landscapes.

Policy NE3: Landscape Character

6.107 Policy NE3 stipulates that development proposals for the landscape character area will need to demonstrate that they have addressed a number of considerations in relation to their potential impact on the landscape. This includes cumulative impacts on trees, woodlands, habitats, biodiversity and ecology. Proposals should also enhance the green infrastructure network, use native species where possible, and strengthen landscape character through planting. Therefore, a minor positive effect is expected in relation to SA objective 5: Biodiversity and geodiversity.

6.108 The policy is expected to have a significant positive effect in relation to SA objective 6: Landscape and townscape. The policy seeks to protect and enhance the intrinsic character and quality of the landscape character area, within which development will be situated, based on the Tonbridge and Malling and Kent Downs AONB Landscape Character Assessment Review and other relevant guidance. Furthermore, the policy states that development proposals will be expected to demonstrate that they effectively prevent, reduce and mitigate any negative impacts on landscape character as well as contribute to

local character and distinctiveness. The policy will therefore help to conserve the distinctive features of the landscape character area, strengthen local identity and ensure that development contributes positively to the landscape.

6.109 The policy stipulates that development proposals must have consideration to their potential impact on the landscape, including any cumulative impacts, such as the presence and pattern of historic landscape features. This will ensure that development respects the heritage value of the landscape, and as such a minor positive effect is expected for the policy in relation to SA objective 7: Historic environment.

6.110 A minor positive effect is expected for Policy NE3 in relation to SA objective 8: Water, as the policy requires proposals to consider impacts on landform, topography, geology and natural patterns of drainage. This will ensure that natural features that support water management are retained, thereby contributing to flood resilience.

Policy NE4: Designated Sites, Irreplaceable Habitat and Species

6.111 Policy NE4 sets out that the enhancement of biodiversity through the creation, enhancement and extension of designated sites locally will be supported. This is likely to have a minor positive effect in relation to SA objective 1: Health and well-being, as improved biodiversity and access to designated sites will encourage outdoor activity and support access to nature, with benefits to mental and physical health.

6.112 The overarching aim of Policy NE4 is to restrict development that will cause significant harm to designated sites and priority habitats and species. The policy states that developments that will have an adverse effect on international wildlife sites, Sites of Special Scientific Interest, Local Wildlife Sites, Local Nature Reserves or Regionally Important Geological Sites will not be supported, other than in exceptional circumstances. The policy is therefore expected to have a significant positive effect in relation to SA objective 6: Biodiversity and geodiversity. However, the policy sets out that in limited, exceptional circumstances, development that could harm protected sites will be allowed. This includes circumstances where the benefits of the development clearly outweigh the impacts on the site and where adverse impacts have been minimised, mitigated and suitably compensated for, and enhancements provided. Scenarios of biodiversity decline and harm on designated sites is

therefore feasible in the context of some developments which will cause minor negative effects in relation to SA objective 6.

6.113 The policy is expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation as it supports the creation, enhancement and extension of designated sites locally. Additionally, the policy supports development that seeks to conserve, restore and where possible, enhance irreplaceable habitats, and priority habitats and species. This will help to maintain and increase carbon storage and sequestration in the borough.

6.114 The policy is expected to have mixed minor positive and minor negative effects in relation to SA objective 11: Climate change adaptation. This is due to the policy's encouragement for developments to conserve and enhance designated sites, which has the potential to strengthen the natural environment's ability to cope with climate change. However, under the specific circumstances where direct and indirect harm to designated sites is permitted, erosion of the natural environment and a decline in its quality and health will result in a weaker capacity to tackle climate change issues.

6.115 The enhancement of biodiversity through the creation, enhancement and extension of locally designated sites is likely to have a minor positive effect in relation to SA objective 12: Pollution, as increased vegetation and healthier ecosystems can help absorb air pollutants and naturally filter and improve air quality.

Policy NE5: Biodiversity Net Gain

6.116 Although Policy NE5 refers to the delivery of a minimum of 10% biodiversity net gain (BNG) in new developments, this is already a requirement under the Environment Act 2021. However, the policy also requires development proposals to submit a Biodiversity Gain Plan. According to the policy, proposals for BNG should be delivered on-site, taking into account local green infrastructure priorities set out in the Local Nature Recovery Strategy, the Tonbridge and Malling Green and Blue Infrastructure Strategy and the Kent Biodiversity Strategy. Additionally, the policy stipulates that proposals must provide sufficient BNG information to satisfy the Council that the BNG requirement is capable of being successfully discharged and ensure that any BNG is in addition to any mitigation or compensatory measures. This will have a significant positive effect in relation to SA objective 5: Biodiversity and geodiversity.

6.117 A minor positive effect is expected against SA objective 7: Water as the policy encourages BNG that helps deliver nature-based solutions for biodiversity loss, such as the restoration and creation of ecosystems to protect communities from flooding.

6.118 The policy is also expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation as the policy stipulates that the Council will encourage BNG that delivers nature-based solutions for climate change and biodiversity loss, including the restoration and creation of ecosystems to protect communities from flooding or increasing carbon sequestration. A minor positive effect is also expected in relation to SA objective 11: Climate change adaptation, as these measures will improve the resilience of ecosystems and communities to the effects of climate change.

6.119 Additionally, a minor positive effect is expected in relation SA objective 12: Pollution as enhanced planting and biodiversity will increase carbon sequestration and improve air quality.

Policy NE6: Green and Blue Infrastructure

6.120 Policy NE6 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being as it seeks to protect and enhance green and blue infrastructure. This will support improved mental well-being and physical health of the population by improving access to a range of nature-rich spaces, green routes and features such as footpaths that enhance public amenity.

6.121 The policy is expected to have a significant positive effect against SA objective 5: Biodiversity and geodiversity. The policy stipulates that new development proposals must ensure that the loss of existing green and blue infrastructure is avoided, and that new green and blue infrastructure is considered and integrated into scheme design from the outset. The policy specifies that the design of new green and blue infrastructure should deliver Biodiversity Net Gain and support ecosystem services in support of the Local Nature Recovery Strategy. The policy also requires that where harm cannot be avoided, development will only be supported if suitable mitigation and/or compensation measures for the network are provided in line with the mitigation hierarchy.

6.122 The policy states that the design of new green and blue infrastructure should have regard to the landscape and townscape, historic character and contribute to establishing a strong sense of place. As such, it is expected to

have a minor positive effect in relation to SA objectives 6: Landscape and townscape and 7: Historic environment.

6.123 The policy stipulates that the design and layout of new green and blue infrastructure should take opportunities to incorporate a range of environmental features, such as urban greening and green walls and roofs. These features can help to mitigate surface flood risk and runoff rates and improve water quality by enhancing natural drainage and filtration. Furthermore, the policy seeks to minimise any indirect adverse effects of the design of new green and blue infrastructure on water quality. Therefore, the policy is expected to have a minor positive effect in relation to SA objective 8: Water.

6.124 Additionally, urban greening can help protect and improve soil quality by reducing erosion and contamination. As such, the policy is expected to have a minor positive effect in relation to SA objective 9: Soils.

6.125 The policy supports the green and blue infrastructure network in the borough. This is likely to have a minor positive effect in relation to SA objective 10: Climate change mitigation, as the integration of green and blue infrastructure in new development will help to enhance the borough's carbon sequestration and storage. Additionally, the provision of green routes and environment features such as footpaths may encourage an uptake of active travel modes such as walking and cycling, which could limit greenhouse gas emissions associated with the private car.

6.126 The policy encourages green and blue infrastructure that supports climate change adaptation and resilience for both people and nature including through the use of appropriate habitats and climate resilient species to provide opportunities for species migration and the use of new tree planting to facilitate shading and cooling. As such, the policy is expected to have a minor positive effect in relation to SA objective 11: Climate change adaptation.

6.127 A minor positive effect is also expected in relation to SA objective 12: Pollution. In prioritising green and blue infrastructure provision, air pollution will be mitigated through carbon sequestration and interception. Moreover, the provision of green routes and footpaths will potentially encourage clean and active transport options such as walking and cycling, subsequently reducing reliance on private vehicles and associated air pollution.

Policy NE7: Woodland, Trees and Hedgerows

6.128 Policy NE7 supports development proposals that incorporate trees within their design and layout, in urban and rural areas. This includes tree-lined streets, which will enhance the amenity of the public realm. As such, a minor positive effect is expected in relation to SA objective 1: Health and well-being, as a high quality public realm including vegetation can promote physical activity, reduce stress and improve physical health and mental well-being.

6.129 The policy aims to protect, restore, manage, enhance and supplement existing woodland, trees and hedgerows. In doing so, it sets out overarching principles for development proposals that will ensure habitats are conserved and enhanced where relevant. It also provides guidance for mitigating loss and degradation. It sets out that any proposals which would affect woodlands, trees and/or hedges within the application site or on land adjacent to the site (including street trees), will need to be supported by a survey showing the trees/hedges and providing details of protection measures. The policy also stipulates that proposals should incorporate trees within the design and layout of development. Therefore, a significant positive effect is expected in relation to SA objective 5: Biodiversity and geodiversity.

6.130 The policy stipulates that new trees, woodland and hedgerows should be located to support landscape character. Any planting should use species characteristic of the local area and be sensitive to the site's surroundings, including its historic context. Therefore, the policy is expected to have minor positive effects in relation to SA objectives 6: Landscape and townscape and 7: Historic environment.

6.131 In encouraging the protection, restoration, management and enhancement of woodland, trees and hedgerows, the policy is expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation. Expanding tree, woodland and hedgerow cover will increase the sequestration of carbon and other greenhouse gases, contributing to reduced emissions.

6.132 A minor positive effect is expected for the policy against SA objective 11: Climate change adaptation. The policy supports locating new trees, woodland and hedgerows to enhance and restore biodiversity, and facilitate climate change mitigation and adaptation. Furthermore, the policy encourages the planning of climate resilient and native species. This will help to strengthen the natural environment by providing more habitats, foraging material and green corridors for wildlife, making them more adaptable to climatic changes and extreme weather events. Similarly, increased shading will help to make

communities more resilient to the effects of climate change. An increase in tree, woodland and hedgerow cover is also expected to have a minor positive effect against SA objective 12: Pollution by filtering pollutants, which will improve the quality of the air.

Policy NE8: Best and Most Versatile Agricultural Land

6.133 The policy seeks to protect the best and most versatile (BMV) agricultural land. Planning applications that would result in the loss of BMV land will be expected to justify why the loss of the land is acceptable and to assess its value and wider contribution in terms of farming resources, food production, natural capital and ecosystems services. The policy is therefore expected to have minor positive effects in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape, 7: Historic environment and 8: Water.

6.134 The policy is expected to have a significant positive effect in relation to SA objective 9: Soils as it specifically seeks to protect BMV agricultural land from development. As well as the above measures, the policy encourages the use of lower-quality agricultural land in preference to higher-quality land wherever possible.

6.135 A minor positive effect is expected against SA objectives 4: Economic growth and 14: Housing, as the policy indicates that where there is an overriding need for development or no alternative suitable sites, development of BMV agricultural land will be permitted. This flexibility should avoid restrictions on residential and commercial development coming forwards to meet local needs, where justified.

Policy NE9: Noise, Vibration and Odour

6.136 Policy NE9 is expected to have a significant positive effect against SA objective 12: Pollution, as the core aim of the policy is to minimise noise generation in close proximity of sensitive receptors and ensure that development is appropriate for its location when considered alone and cumulatively. Where adverse impacts from noise, vibration or odour pollution on sensitive receptors are identified, applicants must demonstrate how the development will be designed and implemented to prevent, avoid and mitigate these impacts.

6.137 Policy NE9 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being as it ensures that development minimises,

and where possible reduces noise, vibration and odour pollution. The policy stipulates that sensitive receptors, including occupants of residential development and facilities including schools and care facilities, and areas used for amenity and recreation to be protected from unacceptable levels of noise, vibration and odour pollution. This will ensure that the physical and mental health and well-being of local communities is conserved.

6.138 The policy stipulates that sensitive receptors including designated nature conservation sites, National Landscapes and the historic environment will be protected from unacceptable levels of noise, vibration and odour pollution. Development will only be permitted if applicants can demonstrate that their proposals will not result in unacceptable pollution levels, having regard to the relevant British Standards, national guidance and good practice. Minor positive effects are therefore expected against SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape and 7: Historic environment, as the policy helps to safeguard the quality and integrity of these sensitive natural and cultural assets from noise, vibration and odour pollution.

Policy NE10: Air Quality

6.139 Policy NE10 is expected to have a significant positive effect in relation to SA objective 12: Pollution as the overarching aim of the policy is to ensure that new development improves air quality and reduces the effects of poor air quality. This includes through minimising exposure to air pollution and assisting in facilitating compliance with relevant limit values and/or national objectives for air pollutants. This will help to promote improved local air quality. Additionally, the policy restricts development in relation to Air Quality Management Areas, stipulating that development will not be permitted where new receptors would be introduced into an area of poor air quality unless the proposals incorporate acceptable measures to ensure those receptors would not be subject to unacceptable risks as a result of poor air quality.

6.140 Policy NE10 seeks to ensure that development improves air quality and reduces the effects of poor air quality by minimising exposure to air pollution and assisting in facilitating compliance with relevant limit values and/or national objectives for air pollutants. Where air quality concerns are anticipated, the policy requires an Air Quality Assessment to determine whether the predicted impacts of a development on local air quality could adversely affect public health and/or the environment, and to identify appropriate mitigation. A minor positive effect is therefore expected in relation to SA objective 1: Health and well-being as the policy ensures that new development will not cause

deterioration to air quality, thereby supporting healthier living environments for residents and the wider community and overall well-being.

6.141 The policy seeks to ensure that development does not cause deterioration in air quality or introduce uses sensitive to air pollution into areas that already experience poor air quality. In addition, the policy requires that development safeguards ecology, local wildlife and habitats, and specifies that proposals likely to affect an internationally designated site will be subject to a Habitats Regulations Assessment. As such, the policy is expected to have a minor positive effect against SA objective 5: Biodiversity and geodiversity.

Policy NE11: Ground Contamination

6.142 Policy NE11 ensures that development shall only be built on contaminated land when it has been satisfactorily remediated. This will ensure that there is reduced harm to soil quality. As such, a significant positive effect is expected in relation to SA objective 9: Soils.

6.143 Policy NE11 restricts the potential for development on contaminated land. The policy stipulates that development on or near sites which have previously been used for activities which pose a risk of land contamination will be properly assessed and remediated. It requires developers to identify and assess contamination risks to human health through site investigations and, where necessary, implement appropriate remediation measures to make the land safe for its intended use. Therefore, the policy is expected to have a minor positive effect in relation to SA objective 1: Health and well-being as these measures will help prevent harm to human health from exposure to land contamination.

6.144 The policy is expected to have a minor positive effect in relation to SA objective 8: Water. This is because the policy requires, where contamination is identified, that development proposals set out a detailed strategy for site investigation works, along with any details of site clearance, ground investigations or survey work to enable intrusive investigations, and assess the degree and nature of contamination. This includes its potential impact on controlled waters, human health and the wider environment. Additionally, by requiring remediation of contaminated land before development proceeds, the policy helps prevent pollutants from leaching into waterbodies or groundwater, thereby safeguarding water quality.

Policy NE12: Light Pollution

6.145 Policy NE12 is expected to have a significant positive effect in relation to SA objective 12: Pollution. This is because the overarching aim of the policy is to ensure that new development avoids creating significant levels of light pollution on the natural and built environment. The policy also encourages energy-efficient lighting and requires assessments and mitigation where light impacts are anticipated.

6.146 Policy NE12 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being as it seeks to ensure that new development does not lead to significant levels of light pollution on the natural and built environment. Furthermore, the policy stipulates that development must be located and designed to minimise light pollution on the locality and amenities of residents to an acceptable level. This will help to limit adverse impacts on the health and well-being of residents and neighbouring residents.

6.147 The policy seeks to limit inappropriate lighting, stating development must have regard to the type and level of lighting to ensure that it does not adversely impact upon wildlife and habitats. By minimising the impact of lighting or artificial lighting, which can considerably disrupt wildlife behaviour and ecosystems, the policy is expected to have a minor positive effect against SA objective 5: Biodiversity and geodiversity.

6.148 The policy requires that development within or near the Kent Downs and High Weald National Landscapes incorporates lighting that protects dark skies and respects the area's character. Additionally, the policy seeks to limit inappropriate lighting that could adversely impact upon the historic environment, heritage assets and their settings, and the wider countryside and rural character. Therefore, the policy is expected to have minor positive effects in relation to SA objectives 6: Landscape and townscape and 7: Historic environment.

6.149 The policy stipulates that new development should have regard to energy efficient lighting, particularly the utilisation of low energy bulbs/LEDs where possible. This is expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation as the use of such lighting will help to reduce energy consumption.

The historic environment

6.150 This section presents the appraisals of the following Local Plan policies:

- Policy HE1: The Historic Environment
- Policy HE2: Listed Buildings
- Policy HE3: Conservation Areas
- Policy HE4: Historic Parks and Gardens (designated and non-designated)
- Policy HE5: Archaeology
- Policy HE6: Enabling Development for Heritage Assets

6.151 The likely effects of the policies in relation to each SA objective are shown in Table 6.5 and are described below the table.

Table 6.5: Likely sustainability effects of the historic environment policies

SA objective	HE1	HE2	HE3	HE4	HE5	HE6
SA1: Health and well-being	0	0	+	0	0	0
SA2: Services and facilities	0	0	0	0	0	0
SA3: Education	0	0	0	0	0	0
SA4: Economic growth	0	0	0	0	0	0
SA5: Biodiversity and geodiversity	0	0	+	0	0	0
SA6: Landscape and townscape	+	0	+	+	0	+
SA7: Historic environment	++	++	++	++	++	++
SA8: Water	0	0	0	0	0	0
SA9: Soils	0	+	0	0	0	0
SA10: Climate change mitigation	0	0	+	0	0	0
SA11: Climate change adaptation	0	+	0	0	0	0
SA12: Pollution	0	0	0	0	0	0
SA13: Waste	0	0	0	0	0	0

SA objective	HE1	HE2	HE3	HE4	HE5	HE6
SA14: Housing	0	0	0	0	0	0

Policy HE1: The Historic Environment

6.152 As the primary focus of this policy is on the protection or enhancement of the historic environment, a significant positive effect is expected in relation to SA objective 7: Historic environment. The policy requires all designated and non-designated heritage assets and their settings to be given the highest level of protection and to be conserved and enhanced in a manner appropriate to their significance. Additionally, the policy requires development proposals affecting any heritage assets and their setting to demonstrate a clear understanding of their significance, using this to shape development schemes early and minimise harm. Heritage statements must justify the proposals, consider cumulative impacts, and refer to local guidance where appropriate, including specific advice for historic farmsteads. While the policy does provide exceptional circumstances where loss or harm to a heritage asset will be accepted, this is not considered to have any negative effects as the circumstances are stringently set.

6.153 Policy HE1 requires development to make a positive contribution to the character and distinctiveness of the borough. Therefore, Policy HE1 is expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape.

6.154 The measures set out in this policy could be seen as restrictive to development such as new housing; however, they will ensure that new development is high quality and appropriately sited. Negligible effects are therefore likely in this sense.

Policy HE2: Listed Buildings

6.155 The primary focus of Policy HE2 is the protection of statutory listed buildings, and as such, a significant positive effect is expected for the policy against SA objective 7: Historic environment. The policy stipulates that development proposals affecting listed buildings should have special regard to the desirability of preserving the asset or its setting. Loss of or harm to a listed building or its setting will only be permitted in exceptional circumstances, where it can be demonstrated that the loss or harm achieves substantial public benefit.

Proposals affecting listed buildings must preserve or enhance the building's historic character, integrity and setting, and avoid damage to its architectural and historical significance.

6.156 The policy supports the active use of historic buildings, stating that proposals for alternative uses that contribute positively to their conservation will be supported. This will help to conserve and enhance soil resources by promoting the re-use of existing buildings, which will help to support a more efficient use of land resources. As such, a minor positive effect is expected for the policy in relation to SA objective 9: Soils.

6.157 The policy also supports making listed buildings more resilient to climate change through appropriate adaptation measures. The policy stipulates that proposals to install energy efficiency improvements or improve environmental sustainability will be supported where it can be demonstrated that the proposed measures take a 'whole building approach' and are suitable for the asset, and informed by an understanding of their specific performance, including construction and materials. The policy is therefore expected to have a minor positive effect in relation to SA objective 11: Climate change adaptation.

Policy HE3: Conservation Areas

6.158 Policy HE3 sets out how the Council will preserve and enhance the character and appearance of the borough's conservation areas. The policy requires all new development and alterations within or affecting conservation areas and their settings to preserve trees and landscaping, open spaces, signage and street furniture. This is likely to have minor positive effects in relation to SA objectives 1: Health and well-being and 5: Biodiversity and geodiversity. Protecting green infrastructure within these historic environments will not only supports biodiversity and natural habitats but also promote mental and physical well-being by retaining green spaces for the community.

6.159 The policy requires all new development and alterations within or affecting conservation areas and their settings to be of an appropriate land use and be sensitively designed to reflect the character and appearance of the area, and to respect the physical form, layout, scale, massing, architectural features, materials, height, building lines, roofscapes and relationships between buildings and the spaces and enclosures between them. The policy also states that development proposals affecting conservation areas and their settings must preserve important views and vistas into and out of the conservation area and towards the surrounding landscape. This will help to maintain the distinctive townscape and local identity of the borough, and its relationship with the wider

landscape. Therefore, the policy is expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape.

6.160 The policy is expected to have a significant positive effect against SA objective 7: Historic environment, as the policy sets out how the Council will preserve and enhance the character and appearance of the borough's conservation areas. The policy establishes stringent criteria for proposals involving demolition or substantial demolition within conservation areas. For example, demolition will only be supported if the removal of the structure and its replacement would enhance the area, or if planning permission has been granted for redevelopment that makes an equal or greater contribution to the character and appearance of the conservation area.

6.161 The policy supports proposals for energy efficiency and measures to mitigate climate change as appropriate, where they preserve or enhance the character or appearance of the conservation areas and their settings, and are easily reversible. The policy is therefore expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation.

Policy HE4: Historic Parks and Gardens (designated and non-designated)

6.162 Policy HE4 supports development proposals where they preserve or enhance the character, appearance, historic interest and setting, significance, design and layout and key views of historic parks and gardens on the national register of local significance. By protecting these valued historic landscapes from inappropriate development, the policy is expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape, and a significant positive effect in relation to SA objective 7: Historic environment.

Policy HE5: Archaeology

6.163 Policy HE5 seeks to conserve and, where possible, enhance the borough's archaeology and historic integrity of scheduled monuments and other archaeological assets, as well as their settings. The policy sets out guidance that proposals affecting archaeological features must follow. It requires development proposals to demonstrate that they will not harm the significance of any archaeological heritage, whether through direct or indirect impacts on designated sites and their settings. Development proposals on sites with known or potential archaeological assets must include an appropriate desk-based assessment. If the assessment identifies significant or potentially important

archaeology, developers will be required to commission field surveys or evaluations by a qualified professional before the planning application is determined. The policy is therefore expected to have a significant positive effect in relation to SA objective 7: Historic environment.

Policy HE6: Enabling Development for Heritage Assets

6.164 Policy HE6 sets out the circumstances in which enabling development to heritage assets will be permitted. The development must demonstrate that it will not demonstrably harm the heritage values of the asset or its setting and also be the minimum necessary to protect the significance of the heritage asset. Additionally, there must be a legal agreement to secure the restoration of the asset. These stringent criteria will ensure that development minimises potential adverse effects on heritage assets. A significant positive effect is therefore expected for the policy in relation to SA objective 7: Historic environment.

Design

6.165 This section presents the appraisals of the following Local Plan policies:

- Policy D1: Achieving High Quality Design
- Policy D2: Design Codes and Masterplans

6.166 The likely effects of the policies in relation to each SA objective are shown in **Table 6.6** and are described below the table.

Table 6.6: Likely sustainability effects of the design policies

SA objective	D1	D2
SA1: Health and well-being	+	+
SA2: Services and facilities	0	0
SA3: Education	0	0
SA4: Economic growth	+	0
SA5: Biodiversity and geodiversity	+	0

SA objective	D1	D2
SA6: Landscape and townscape	++	++
SA7: Historic environment	+	0
SA8: Water	0	0
SA9: Soils	+	0
SA10: Climate change mitigation	+	0
SA11: Climate change adaptation	+	0
SA12: Pollution	+	0
SA13: Waste	+	0
SA14: Housing	+/-	+

Policy D1: Achieving High Quality Design

6.167 Policy D1 sets out criteria to ensure that all development in the borough delivers high quality and inclusive design. The policy requires proposals to incorporate the principles of good design, create inclusive and attractive places, reflect local character and distinctiveness, promote a sense of place, and contribute to health and well-being. In particular, the policy supports development proposals that have regard to 'Building for a Healthy Life' and demonstrate that they meet the Government's latest Nationally Described Space Standard in respect of internal accommodation, clearly setting out the floor area, number of dwelling storeys, the number of beds and built-in storage areas for each dwelling typology. This will ensure high-quality and healthy living environments for residents. The policy also stipulates that development should maximise opportunities for healthy active lifestyle choices and requires development to avoid unacceptable adverse impacts on the amenity of neighbouring properties and their occupants, specifically with regard to privacy, sunlight, daylight, overbearing effects, noise, odour, traffic and vibration. Development should also promote inclusive design and deter crime and reduce the fear of crime. This will help to create environments that are safe, welcoming

and easy to navigate for all people. A minor positive effect is therefore expected for the policy in relation to SA objective 1: Health and well-being.

6.168 The policy promotes high-quality, inclusive and attractive places in the borough, stipulating that development should be well-connected in transport terms and integrate well into the existing network. The policy will therefore help to increase footfall and attract visitors, helping to support the local economy. The policy is therefore expected to have a minor positive effect in relation to SA objective 4: Economic growth.

6.169 The policy outlines a range of design criteria against which development proposals will be supported. This includes the provision of high-quality, multi-functional green and public spaces, the conservation and creation of habitats to support wildlife and maximising opportunities for Biodiversity Net Gain. Development proposals are also expected to incorporate tree-lined streets and other forms of planting to enhance environmental and visual quality. As such, the policy is expected to have a minor positive effect in relation to SA objective 5: Biodiversity and geodiversity.

6.170 The policy stipulates that all development in the borough must pay regard to local distinctiveness and character. The policy supports proposals that demonstrate a clear understanding of their context, such as important views, topography, landscape and landscape features, townscape, scale and heritage. The policy also stipulates that new development must be of an appropriate density of the area, taking into account the character of the area and making a positive contribution to the visual harmony of the area. By promoting context-sensitive design, the policy will help to conserve and enhance local character, and the public realm. As a result, a significant positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.171 The policy states that development must be locally distinctive, respond cohesively and create a positive sense of place by demonstrating a thorough understanding of the context and character of an area, including heritage. Therefore, the policy is likely to have a minor positive effect in relation to SA objective 7: Historic environment, as it supports development that respects and enhances the historic character and significance of local areas.

6.172 A minor positive effect is expected for the policy in relation to SA objective 9: Soils, as the policy encourages development at appropriate densities for the area, with higher density development supported in sustainable and accessible locations. Higher density development is an efficient use of previously developed land and will help to protect soil quality by reducing land take-up.

6.173 A minor positive effect is expected for the policy in relation to SA objective 10: Climate change mitigation, as the policy seeks to encourage safe and sustainable movement. The policy supports development that is well-connected to existing transport networks and supports a shift from car dependency by prioritising high-quality pedestrian and cycle infrastructure, including Public Rights of Way connections. The policy also promotes walkable neighbourhoods, reduced vehicle speeds and people-focused design. These measures collectively will help to reduce reliance on the private car and associated greenhouse gas emissions.

6.174 The policy also supports development which is designed to reduce overheating and regulate the internal temperature of buildings through building form, orientation, passive ventilation and cooling, landscaping, urban greening and street trees, shading mechanisms, external colouring and green roofs and living walls. These features will help development to adapt to climatic changes and extreme weather events, particularly extreme heat. This will also help to reduce reliance on energy-intensive cooling systems. A minor positive effect is therefore expected for the policy in relation to SA objective 11: Climate change adaptation.

6.175 A minor positive effect is also expected in relation to SA objective 12: Pollution. In supporting habitat conservation, creation of wildlife and opportunities for Biodiversity Net Gain, air pollution will be mitigated through carbon sequestration and interception. Additionally, the policy's prioritisation of sustainable transport, supporting walkable neighbourhoods and high-quality pedestrian and cycle infrastructure will help to reduce reliance on private vehicles and associated air pollution. The policy also stipulates that development should be designed to avoid unacceptable adverse impacts or harm to the amenities of neighbouring properties and their users/occupants in terms of privacy, sunlight and daylight, overbearing, noise, odour, traffic and vibration. This will help to reduce levels of and exposure to noise pollution for residents particularly in relation to new development.

6.176 The policy is expected to have a minor positive effect on SA objective 13: Waste as it states that development should make appropriate and visually attractive provision for service areas, refuse storage (including waste and recycling bins) and collection areas. In addition, by promoting durable design and the use of traditional, long-lasting materials, the policy encourages the creation of buildings with extended lifespans, thereby reducing waste associated with maintenance, repair and replacement.

6.177 The policy sets out the criteria and guidance documents for all new developments to comply with when designing new buildings and places. The policy requires development to have regard to national and local design guidance (including The Kent Design Guide), relevant design guides and design codes. The policy also states that development must meet the Nationally Described Space Standard in respect of internal accommodation, clearly setting out the floor area, number of dwelling storeys, the number of beds and built-in storage areas for each dwelling typology. Such criteria will ensure that new development delivers high quality and sustainable housing, and therefore a minor positive effect is likely in relation to SA objective 14: Housing. However, this is coupled with a minor negative effect as these standards may make development less viable and therefore potentially limit the housing proposals that developers can put forward.

Policy D2: Design Codes and Masterplans

6.178 Policy D2 supports the use of masterplans and design codes for larger developments, requiring the submission of a masterplan for all sites of 100 or more dwellings, or sites for significant non-residential development, and the development of design codes for large key sites, and large-scale strategic sites of 500 or more dwellings. By establishing a clear design framework informed by community engagement and local aspirations, the policy ensures that development will deliver high-quality, sustainable and well-coordinated places. The policy stipulates that the preparation of design codes and masterplans will consider the advice contained in national planning policy, including the National Design Guide and the National Model Design Code and other evolving good design practice. The emphasis on involving communities in shaping development will help to promote a sense of inclusion, thereby supporting the mental and social well-being of communities. The policy is therefore likely to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.179 The policy is expected to have a significant positive effect in relation to SA objective 6: Landscape and townscape, as the requirement for masterplans and design codes for larger developments, which are informed by a thorough understanding of the site and the area, will ensure that new development responds appropriately to its surroundings. The policy also states that for larger schemes proposing 500 or more dwellings, or where significant design implications are identified, these applications will be referred to a Design Review Panel. The use of this safeguard will ensure that such developments are properly assessed at an early stage and therefore help to promote high-

quality design of new development that is contextually appropriate with its surrounding environment.

6.180 The policy requires the use of masterplans and design codes for larger residential development. This will ensure that new residential development is carefully considered, particularly in relation to its layout, density and design quality. The policy is therefore expected to have a minor positive effect in relation to SA objective 14: Housing.

Housing policies

6.181 This section presents the appraisals of the following Local Plan policies:

- Policy H1: Housing to Address Needs
- Policy H2: Affordable Housing
- Policy H3: Build to Rent
- Policy H4: Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites
- Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria
- Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People
- Policy H7: Accessible and Adaptable Homes
- Policy H8: Self and Custom Build Housing
- Policy H9: Houses in Multiple Occupation
- Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation

6.182 The likely effects of the policies in relation to each SA objective are shown in Table 6.7 and described below the table.

Table 6.7: Likely sustainability effects of the housing policies

SA objective	H1	H2	H3	H4	H5	H6	H7	H8	H9	H10
SA1: Health and well-being	+	+	+	0	+	++	++	+	+	+
SA2: Services and facilities	+	0	+	0	+	+	0	+	0	0
SA3: Education	0	0	0	0	+	0	0	0	0	0
SA4: Economic growth	0	0	0	0	0	0	0	0	0	0
SA5: Biodiversity and geodiversity	0	0	0	0	0	0	0	0	0	0
SA6: Landscape and townscape	0	0	0	0	+	0	0	0	+	+
SA7: Historic environment	0	0	0	0	0	0	0	0	0	+
SA8: Water	0	0	0	0	+	0	0	0	0	0
SA9: Soils	0	0	0	0	0	0	0	+	0	0
SA10: Climate change mitigation	+	0	+	0	+	+	0	+	0	0
SA11: Climate change adaptation	0	0	0	0	0	0	0	0	0	0
SA12: Pollution	+	0	+	0	+	+	0	+	0	0

SA objective	H1	H2	H3	H4	H5	H6	H7	H8	H9	H10
SA13: Waste	0	0	0	0	+	0	0	0	+	0
SA14: Housing	++	++	++	++	++	++	++	++	+	+

Policy H1: Housing to Address Needs

6.183 Policy H1 states that housing development will be supported that is consistent with the settlement hierarchy. Therefore, more housing will be delivered in settlements further up the hierarchy, where more services and facilities are available. Therefore, Policy H1 is expected to have a minor positive effect in relation to SA objective 2: Services and facilities. Locating development in settlements further up the hierarchy is likely to also reduce the need to travel via private car to reach certain services and facilities. This will minimise greenhouse gas emissions associated with the private car and therefore a minor positive effect is also expected in relation to SA objective 10: Climate change mitigation. It will also likely minimise air pollution associated with the private car and therefore a minor positive effect is also expected in relation to SA objective 12: Pollution.

6.184 Policy H1 sets out the ways in which the Council will meet local housing need by delivering a wide choice of high quality and well-designed homes. The policy sets out requirements for the mix of dwelling types, tenures and sizes, and the percentage of which should be affordable home ownership and affordable housing rental. This will contribute towards housing delivery and so Policy H1 is expected to have a significant positive effect in relation to SA objective 14: Housing. The availability of housing, including affordable housing, will have positive effects on people's well-being, including the fact the delivery of new homes will contribute towards the creation of mixed, balanced and inclusive communities. Therefore, Policy H1 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

Policy H2: Affordable Housing

6.185 Policy H2 supports the delivery of affordable housing and sets out what percentage of new housing should be affordable. This differs between areas. For example, the requirement for affordable housing is higher on sites within a National Landscape or the Green Belt. Development proposals are required to submit an Affordable Housing Statement setting out how they meet the policy requirements and according to the policy, affordable housing should genuinely be affordable. Overall, therefore, a significant positive effect is expected in relation to SA objective 14: Housing. The provision of affordable housing will help ensure people have a home, which can have positive effects on well-being. Further to this, the policy requires affordable housing provision to be well-integrated into schemes and externally indistinguishable from market housing.

This could have positive effects on social cohesion. Overall, a minor positive effect is expected in relation to SA objective 1: Health and well-being.

Policy H3: Build to Rent

6.186 Policy H3 supports Build to Rent proposals, requiring them to be in sustainable locations with good public transport connections. The sustainable locations are likely to be settlements towards the top of the settlement hierarchy where a number of services and facilities are present. Residents are therefore likely to have good access to everyday amenities. Further to this, the policy requires rental schemes to foster a sense of community through the provision of communal areas, community facilities and services as part of development. As such, a significant positive effect is expected in relation to SA objective 2: Services and facilities. Locating development in these sustainable locations will help reduce reliance on the private car and associated greenhouse gas emissions, as residents will have good access to services and facilities. Therefore, a minor positive effect is expected in relation to SA objective 10: Climate change mitigation. A minor positive effect is also expected in relation to SA objective 12: Pollution, as locating development in sustainable locations and with good public transport connections will help reduce reliance on the private car and associated air pollution.

6.187 The policy seeks to meet the borough's affordable housing need and diversify housing supply through the provision of rental homes. This will help ensure accommodation is available for all, which can have positive effects on well-being. According to the policy, rental schemes should foster a sense of community, and this will be somewhat achieved through the provision of communal areas and community facilities as part of development, which may encourage spontaneous social interaction. Further to this, schemes must provide sufficient internal space for occupants, in line with the Nationally Described Space Standard (or subsequent equivalent). This will help ensure occupants are provided with a comfortable amount of space, with beneficial effects on their well-being. Overall, therefore, a minor positive effect is expected in relation to SA objective 1: Health and well-being.

6.188 As the purpose of Policy H3 is to meet the borough's affordable housing need and to diversify housing supply through the provision of rental homes, a significant positive effect is expected in relation to SA objective 14: Housing.

Policy H4: Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites

6.189 Policy H4 safeguards and protects existing Gypsy, Traveller and Travelling Showpeople sites. This will help ensure pitches and plots continue to be available for Gypsies, Travellers and Travelling Showpeople, meeting their accommodation needs. Therefore, Policy H4 is expected to have a significant positive effect in relation to SA objective 14: Housing.

Policy H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria

6.190 Policy H5 supports the provision of Gypsy, Traveller and Travelling Showpeople sites where they promote peaceful and integrated co-existence between the site and local community and are within close proximity of primary healthcare facilities. This will likely have positive effects on health and well-being and so a minor positive effect is expected in relation to SA objective 1: Health and well-being.

6.191 According to Policy H5, proposals for new, extended or intensified Gypsy, Traveller and Travelling Showpeople sites will be supported where the site is in a sustainable location and is either within or adjacent to settlement confines or within close proximity of a range of services and facilities that are accessible by public transport, including schools. Therefore, it is likely that new sites will have easy access to services and facilities, including schools, and so minor positive effects are expected in relation to SA objectives 2: Services and facilities and 3: Education. Ensuring sites have easy access to existing services and facilities will also help reduce reliance on the private car and associated greenhouse gas emissions, in addition to air pollution. Therefore, minor positive effects are also expected in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

6.192 Policy H5 requires new sites to incorporate appropriate landscaping so as to avoid any adverse landscape impacts. Where proposals are within or adjacent to a National Landscape, the scale and extent of development should be limited, sensitively located and designed to enhance, mitigate or avoid impacts. Further to this, the policy requires proposals to achieve a well-designed layout and to include amenity space, which will help protect and enhance the landscape. Therefore, a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.193 Policy H5 requires sites to not be located within an area at high risk of flooding and so a minor positive effect is expected in relation to SA objective 8: Water. Further to this, the policy requires sites to have access to essential services such as water supply, sewerage and drainage, which will contribute towards this minor positive effect.

6.194 Policy H5 requires new sites for Gypsies, Travellers and Travelling Showpeople to incorporate recycling and waste management. This will help ensure waste is minimised and disposed of and so a minor positive effect is expected in relation to SA objective 13: Waste.

6.195 The provision of new sites for Gypsies, Travellers and Travelling Showpeople in line with the policy criteria will ensure their accommodation needs are met through the provision of high quality sites, and so a significant positive effect is expected in relation to SA objective 14: Housing.

Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People

6.196 Policy H6 requires proposals for accommodation for older and vulnerable people to have good accessibility to a range of services and facilities, including community facilities and primary healthcare facilities. It is likely that social activities will be run at community facilities for residents, which could encourage social interaction with positive effects on well-being. Further to this, ensuring accommodation is located close to healthcare will help ensure easy access to healthcare as and when needed. Therefore, a significant positive effect is expected in relation to SA objective 1: Health and well-being.

6.197 According to the policy, accommodation should be in a sustainable location, within a settlement confines boundary and have good accessibility to infrastructure and services, including shops, community facilities, public transport and primary healthcare. Residents will therefore have easy access to numerous services and facilities and so a minor positive effect is expected in relation to SA objective 2: Services and facilities. The policy goes on to state that these services and facilities should be able to be reached without a car, and that appropriate infrastructure should be provided to support walking and wheeling. This will help minimise private car use and associated greenhouse gas emissions, in addition to air pollution. Therefore, minor positive effects are also expected in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

6.198 Policy H6 supports specialist housing for older people and vulnerable groups, making a positive contribution towards the borough's need for specialist housing. According to the policy, the proposal seeks to meet the genuine needs of the older and vulnerable community, ensuring that provision is affordable for the intended occupants and is of an appropriate mix. Therefore, Policy H6 is expected to have a significant positive effect in relation to SA objective 14: Housing.

Policy H7: Accessible and Adaptable Homes

6.199 Policy H7 primarily seeks to deliver accessible and adaptable homes and requires a certain percentage of new homes to meet M4(3) standards, i.e. they are designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. This will help ensure that new homes meet the accessibility needs of residents and can be easily adapted in the future to meet changing needs. The policy encourages discussions with the Council at an early stage of the planning application process to discuss in what way the proposed schemes can reflect local needs. Overall, Policy H7 will help meet housing needs while also ensuring accommodation is available that suits different needs, including those with disabilities. Therefore, significant positive effects are expected in relation to SA objectives 1: Health and well-being and 14: Housing.

Policy H8: Self and Custom Build Housing

6.200 Self and custom build housing gives people the opportunity to build their own home in a way that suits their needs, which could be related to accessibility as a result of a disability. This will help support people's physical health and mental well-being, and so a minor positive effect is expected in relation to SA objective 1: Health and well-being.

6.201 Policy H8 supports development, specifically self and custom build housing development, in sustainable locations. These sustainable locations are likely to be larger settlements towards the top of the settlement hierarchy that have a large number of services and facilities available. This will ensure easy access to everyday amenities and so Policy H8 is expected to have a minor positive effect in relation to SA objective 2: Services and facilities. With services and facilities located within close proximity of one another, people will not have to travel far to reach them and so the policy will help discourage private car travel and associated greenhouse gas emissions, in addition to air pollution. Therefore, minor positive effects are expected in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

6.202 Policy H8 requires self and custom build plots to use land efficiently, while also providing an appropriate density. This is an efficient use of previously developed land and so a minor positive effect is expected in relation to SA objective 9: Soils.

6.203 Policy H8 supports the delivery of high-quality self and custom build housing, which will help diversify the housing market and increase consumer choice. This will contribute towards overall housing delivery and so a significant positive effect is expected in relation to SA objective 14: Housing.

Policy H9: Houses in Multiple Occupation

6.204 Houses in Multiple Occupation (HMOs) are supported under Policy H9 if no harm will be caused to the amenity of future occupants, neighbours or the wider area. This includes privacy and noise issues and so Policy H9 will help protect residential amenity, with beneficial effects on people's well-being. Further to this, HMOs will only be supported where the living spaces and communal facilities are of a good standard thereby supporting well-being. As such, Policy H9 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.205 The policy requires schemes to not adversely affect the character of the area, including eroding the balance between different types of housing. This will help protect the landscape and townscape and so a minor positive effect is expected in relation to SA objective 6: Landscape and townscape. According to the policy, adequate space should be provided to accommodate bin and recycling storage areas and so a minor positive effect is also expected in relation to SA objective 13: Waste.

6.206 Policy H9 outlines what requirements must be met if a residential property is converted to an HMO. Although certain requirements must be met, the policy generally supports HMOs where appropriate and the criteria will ensure that HMOs that do come forward are appropriately located and of a high quality. This will contribute towards meeting accommodation needs and so a minor positive effect is expected in relation to SA objective 14: Housing.

6.207 Policy H9 states that adequate cycle parking/storage must be provided on site, unless the site is located within 800m of a defined town centre that offers public transport services. This will support cycling, which is an active and more sustainable mode of travel than the car. However, the policy also requires vehicular access and adequate car parking/storage, which could arguably facilitate private car travel and associated greenhouse gas emissions, in

addition to air pollution. Overall, the minor positive effects associated with the provision of cycle parking/storage would be downgraded to negligible effects, as a result of this. Therefore, negligible effects are expected in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

Policy H10: Residential Extensions, Alterations, Annexes and Ancillary Accommodation

6.208 Policy H10 supports alterations and extensions to buildings, provided there is no unacceptable loss of privacy and sunlight, or unacceptable overlooking or overshadowing to neighbouring properties. This will help protect residential amenity, with positive effects on people's well-being. The policy also supports proposals for annexes and ancillary accommodation, which have a functional connection with the main dwelling. For example, the occupant could be a dependent relative of the residents of the main dwelling. This will help families to provide accommodation for relatives who need it, with positive effects on this objective. Overall, therefore, Policy H10 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.209 According to Policy H10, alterations and extensions to buildings must be compatible with and integrate coherently with the character of the original building. They must also be set behind the building line to provide a visual break, with roofs designed to complement the existing roof type and tiled to match the existing dwelling. Further to this, there must be no detrimental effect on the amenity and character of the locality and streetscape. This will help protect the local character of the area and so a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.210 Policy H10 requires alterations and extensions to buildings to not cause harm to the special architectural character of listed buildings and non-listed buildings in conservation areas, which will help protect the historic environment from any adverse effects associated with development. Therefore, a minor positive effect is expected in relation to SA objective 7: Historic environment.

6.211 As Policy H10 supports annexes and ancillary accommodation, it is likely to meet the accommodation needs of some dependents. Therefore, a minor positive effect is expected in relation to SA objective 14: Housing.

Economy and Town Centres

6.212 This section presents the appraisals of the following Local Plan policies:

- Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future
- Policy E2: Strategic Employment Areas
- Policy E3: Other Employment Sites, Premises and Floorspace
- Policy E4: Employment and Skills
- Policy E5: Supporting the Vitality of Town, Service and Local Centres
- Policy E6: Primary Shopping Areas
- Policy E7: Above Ground Floorspace
- Policy E8: Sequential and Local Impact Tests

6.213 The likely effects of the policies in relation to each SA objective are shown in Table 6.8 and described below the table.

Table 6.8: Likely sustainability effects of the Economy and Town Centres policies

SA objective	E1	E2	E3	E4	E5	E6	E7	E8
SA1: Health and well-being	+	+	+	0	+	+	0	+
SA2: Services and facilities	+	0	0	0	++	++	+	++
SA3: Education	+	+	0	++	0	0	0	0
SA4: Economic growth	++	++	++	++	++	++	++	++
SA5: Biodiversity and geodiversity	0	0	0	0	+	0	0	0
SA6: Landscape and townscape	0	0	0	0	+	+	+	0
SA7: Historic environment	0	0	0	0	+	0	+	0
SA8: Water	0	0	0	0	0	0	0	0
SA9: Soils	0	+	0	0	0	0	+	0
SA10: Climate change mitigation	+	0	0	0	+	0	0	+

SA objective	E1	E2	E3	E4	E5	E6	E7	E8
SA11: Climate change adaptation	+	0	0	0	0	0	0	0
SA12: Pollution	+	0	0	0	+	0	0	0
SA13: Waste	0	0	0	0	0	0	+	0
SA14: Housing	0	0	0	0	+	0	+	0

Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future

6.214 Policy E1 supports economic growth and sets out the numerous ways in which this will be achieved, including protecting and retaining existing employment floorspace, supporting the redevelopment or intensification of older and lower quality units, particularly in relation to vacant units, supporting new employment floorspace that is near to the labour supply, supporting business startups and small and medium sized enterprises, and creating conditions in which businesses can innovate and grow. Therefore, Policy E1 is expected to have a significant positive effect in relation to SA objective 4: Economic growth.

6.215 Policy E1 seeks to protect and retain existing employment floorspace, in addition to providing new employment floorspace, and so will help to ensure job opportunities are available for existing and new residents in the area. The availability of job opportunities and employment will have positive effects on people's well-being and so a minor positive effect is expected in relation to SA objective 1: Health and well-being. The fact the policy supports sustainable travel infrastructure opportunities will also contribute positively towards SA objective 1, as it has the potential to support active travel and increase levels of physical activity, while also minimising air pollution which can have adverse effects on people's health. A minor positive effect is also expected in relation to SA objective 12: Pollution, as delivering sustainable travel opportunities will reduce private car travel and associated air pollution.

6.216 The policy supports sustainable travel infrastructure opportunities and improvements, in addition to EV charging points and cycle storage. These measures will support the use of more active travel modes and improve accessibility to services, facilities, everyday amenities and job opportunities. Therefore, a minor positive effect is expected in relation to SA objective 2: Services and facilities.

6.217 The policy supports proposals that will contribute to addressing local skill shortages, supporting local employment, re-skilling and retraining. This will help increase the number of opportunities available to support skills development through training development. Therefore, a minor positive effect is expected in relation to SA objective 3: Education.

6.218 Policy E1 supports a few measures that will help mitigate greenhouse gas emissions associated with use of the private car, such as the delivery of sustainable travel infrastructure opportunities and improvements, including EV charging points and cycle storage. Digital infrastructure improvements to facilitate home working are also likely to discourage travel via private car. The policy also seeks to deliver sustainably constructed business premises, in addition to sustainable business operations and processes – all of which will help mitigate carbon emissions. Therefore, a minor positive effect is expected in relation to SA objective 10: Climate change mitigation. Policy E1 also supports the adaptation of existing businesses in response to climate change and therefore a minor positive effect is also expected in relation to SA objective 11: Climate change adaptation.

Policy E2: Strategic Employment Areas

6.219 Policy E2 retains and safeguards 16 existing strategic employment sites for employment purposes. According to the policy, new employment space, or the expansion or adaptation of employment space in these locations, will generally be supported where uses are for E(g), B2 and B8, and lead to an improvement in the quality and quantity of employment floorspace and related jobs. Additionally, proposals will be supported where they complement the employment area and maximise the employment potential of the area. Development of non E(g), B2 and B8 uses, including sui generis uses, will only be permitted where there is a clear and evidenced justification for a departure from the policy, and where the criteria outlined in the policy are met. Policy E2 is therefore expected promote economic growth and so a significant positive effect is expected in relation to SA objective 4: Economic growth.

6.220 Policy E2 will retain the number of job opportunities available, with the prospect of employment having positive effects on people's overall well-being. Therefore, a minor positive effect is expected in relation to SA objective 1: Health and well-being. According to the policy, development will only be supported where it will not affect the amenity of neighbouring properties. This will help protect people's well-being and subsequently contribute to the minor positive effect already recorded against this objective.

6.221 Policy E2 has the potential to increase the number of training opportunities available, in addition to jobs, and could help supports skills development. Therefore, a minor positive effect is expected in relation to SA objective 3: Education.

6.222 Policy E2 supports the expansion or adaptation of employment space in the strategic employment sites. As the strategic employment sites contain development already, this is an efficient use of previously developed land. Therefore, Policy E2 is expected to have a minor positive effect in relation to SA objective 9: Soils.

Policy E3: Other Employment Sites, Premises and Floorspace

6.223 Policy E3 seeks to prevent the loss of existing employment floorspace, stating that any loss will only be permitted where the criteria outlined in the policy are met. According to the policy, proposals for intensification, redevelopment or upgrading of existing facilities will only be supported where they respond to current modern day business needs, support job retention and creation, as well as maintain the overall employment floorspace. Therefore, Policy E3 is expected to have a significant positive effect in relation to SA objective 4: Economic growth.

6.224 Policy E3 only supports the loss of employment floorspace where the criteria outlined in the policy are met, which include no undue effect on neighbouring residential amenity as a result of transport movements, car parking, noise or hours of operations. This requirement will help protect residential amenity, with positive effects on people's mental health. Therefore, a minor positive is expected in relation to SA objective 1: Health and well-being.

Policy E4: Employment and Skills

6.225 Policy E4 requires development proposals over a certain size to submit an Employment and Skills Training Plan to demonstrate how the proposal will contribute to employing, educating and training local people. According to the policy, the Employment and Skills Training Plan will need to set out what training will be provided to local people, how jobs will be promoted to the community, how local people will be prioritised for new opportunities, including those relating to sub-contractors and how local education will be invested in. This will help ensure numerous education and training opportunities are offered

to local people, in addition to employment. Therefore, significant positive effects are expected in relation to SA objectives 3: Education and 4: Economic growth.

Policy E5: Supporting the Vitality of Town, Service and Local Centres

6.226 Policy E5 supports the vitality and function of town, service and local centres, establishing that development proposals will be supported where they contribute to the regeneration of the town centre, including for retail, leisure, entertainment, regeneration, office, employment, markets and other uses. As the policy supports recreational uses in town centres, as well as proposals that contribute to well-being through improvements to the public realm, the policy is expected to have a minor positive effect in relation to SA objective 1: Health and well-being. The policy helps to promote healthy lifestyles and improve equitable access to recreational opportunities such as open space and leisure facilities. Policy E5 also promotes active frontages, supporting the maintenance of low crime levels and reducing the fear of crime.

6.227 By supporting a variety of uses within the town centre, including leisure, recreation, retail, entertainment and markets, as well as supporting proposals which provide an improved service and experience, Policy E5 supports the maintenance and improvement of access to essential services and facilities. Additionally, the policy supports proposals where they result in improved accessibility and sustainable transport facilities, encouraging more sustainable modes of travel and active transport. Therefore, Policy E5 is expected to have a significant positive effect in relation to SA objective 2: Services and facilities.

6.228 Policy E5 supports proposals for a wide range of uses within Tonbridge Town Centre, including retail, offices, arts, culture, tourism, employment and markets. Within the borough boundary, proposals will also be supported for retail, business, food and beverage, pubs/bars and further uses. As such, the policy is likely to have a significant positive effect in relation to SA objective 4: Economic growth by supporting the growth, resilience and expansion of businesses, and supporting the vitality of businesses within the town centre by contributing to the overall balance, mix and diverse offer of town centre uses to support local communities. The policy also supports meanwhile uses in town centres whereby they enhance the character and vitality of the area, maintain active ground floor frontages and retain any existing shopfronts. This has the potential to increase footfall in these centres, contributing towards economic growth.

6.229 Policy E5 supports proposals that contribute to urban greening, including linking centres to green and blue infrastructure, which provides opportunities for people to access wildlife and open green spaces, and supports the protection and enhancement of habitats and wildlife corridors, including in the town centre. Therefore, the policy is expected to have a minor positive effect in relation to SA objective 5: Biodiversity and geodiversity.

6.230 By supporting development that positively contributes to placemaking, including the identity of the town centre and enhancements to the public realm, Policy E5 is expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape. The presence of active frontages will also contribute towards an enhanced townscape. As the policy also has regard to supporting proposals which enhance heritage assets and their settings, Policy E5 is also expected to have a minor positive effect in relation to SA objective 7: Historic environment, which sets out to protect, conserve and enhance heritage assets and their settings, as well as the historic character of the landscape/townscape.

6.231 By supporting proposals for town centre uses where they improve sustainable travel facilities and urban greening, including linking to blue and green infrastructure, the policy promotes the use of sustainable modes of transport such as walking and the use of public transport. This has the potential to reduce use of the private car and associated greenhouse gas emissions, and so Policy E5 is expected to have a minor positive effect in relation to SA objective 10: Climate change mitigation. These measures will also likely reduce noise and air pollution associated with the private car and so a minor positive effect is also expected in relation to SA objective 12: Pollution.

6.232 Policy E5 supports numerous town centre uses, including residential development. Additionally, within the defined centres, the policy establishes that a change of use at ground floor level to a non-town centre use will not be permitted, unless the site is allocated to deliver residential development. This includes the change of use of existing ground floor premises to residential. Therefore, the policy is likely to have a minor positive effect in relation to SA objective 14: Housing, supporting the contribution towards the borough's housing supply.

Policy E6: Primary Shopping Areas

6.233 The aim of Policy E6 is to ensure that Tonbridge and Malling Borough continues to meet the shopping needs of the community. The policy supports development within the Primary Shopping Area that improves street-level

vibrancy and retains and enhances an active frontage at ground floor level. This will help ensure 'eyes on the street' and potentially help prevent crime at the same time as potentially reducing the fear of crime. Further to this, the policy seeks to ensure accessibility to shops for all users. A minor positive effect is therefore expected against SA objective 1: Health and well-being.

6.234 Policy E6 seeks to ensure that proposals for development in the Primary Shopping Area will improve the quality and mix of Class E uses to enhance the role of the centre and its vitality, viability and street-level vibrancy. As this will help maintain and improve access to essential services and facilities, a significant positive effect is expected against SA objective 2: Services and facilities.

6.235 By supporting the enhancement of the role of the Primary Shopping Areas and the vitality and vibrancy of Class E uses, Policy E6 is expected to have a significant positive effect against SA objective 4: Economic growth.

6.236 Policy E6 supports development proposals which encourage an active frontage and contribute to the character of the town centre and public realm and also supports high-quality shop front design and accessibility for users. As such, it is expected to have a minor positive effect against SA objective 6: Landscape and townscape.

Policy E7: Above Ground Floorspace

6.237 Policy E7 generally supports proposals within defined town centre boundaries for upper floor uses including residential uses, commercial uses, co-working spaces, cultural uses or community facilities, where they are considered to contribute to the centre's vitality, viability and sustainability. As the policy encourages the diversity of town centre uses and the introduction of new mixed uses at above ground floorspaces, it is expected to have a minor positive effect on SA objective 2: Services and facilities.

6.238 Policy E7 supports the introduction of new local employment uses within the town centre by encouraging commercial uses and co-working spaces at above ground level and protects the viability of existing businesses by ensuring that development does not result in the loss of ancillary storage space or other beneficial uses to the ground floor unit. As such, the policy is expected to have a significant positive effect in relation to SA objective 4: Economic growth, by encouraging new business and employment opportunities into town centres, better utilising above ground floorspace.

6.239 Policy E7 establishes that, where upper floors are located within conservation areas or involve heritage assets, development proposals must preserve or enhance the significance of those assets. As such, it will support the protection and enhancement of townscape character and quality, heritage assets and the historic character of the landscape/townscape. Additionally, Policy E7 supports proposals which ensure that any new entrance or use does not affect the character and appearance of the building, the public realm, or the functionality or character of the town centre. The policy is therefore likely to have minor positive effects in relation to SA objectives 6: Landscape and townscape and 7: Historic environment.

6.240 By supporting a diversity of above ground uses, Policy E7 is likely to have a minor positive effect in relation to SA objective 9: Soils, by encouraging the efficient use of existing brownfield land and the re-use of buildings, and therefore minimising development that may otherwise be directed towards greenfield land.

6.241 Policy E7 supports proposals for upper floor uses where the upper floors have sufficient refuse storage and collection space, encouraging good waste management practices and therefore is expected to have a minor positive effect in relation to SA objective 13: Waste.

6.242 Policy E7 supports a range of upper floor uses within town centres, including residential uses. As such it is expected to have a minor positive effect in relation to SA objective 14: Housing, through contributing to housing supply and supporting the diversification of the borough's housing mix.

Policy E8: Sequential and Local Impact Tests

6.243 Policy E8 establishes the conditions whereby a sequential test and/or an impact assessment will be required to support a development proposal, in order to encourage the provision of main town centre uses, including leisure uses, within defined town centres. The policy may therefore have positive effects on well-being by improving access to leisure facilities and so is expected to have a minor positive effect on SA objective 1: Health and well-being.

6.244 Policy E8 outlines that applications for retail and leisure uses outside designated town centre boundaries will be required to include an impact assessment where the development is for 400sqm or more of retail or leisure floorspace and must sufficiently demonstrate that the proposal will not have an adverse effect on any town centre within the borough or in surrounding areas. As such, the policy is likely to have a significant positive effect on SA objective

2: Services and facilities, by improving and maintaining access to leisure facilities within town centres. A minor positive effect is also likely in relation to SA objective 10: Climate change mitigation, as development will be restricted in out of town locations where car use may be high.

6.245 The policy seeks to ensure that retail and leisure uses are primarily directed towards town centres or located in accessible and sustainable locations well-connected to the nearest town centre. When such uses are proposed outside town centres, it must be demonstrated that the proposal will not have an adverse effect on any town centre. If an out-of-town centre location is considered suitable, planning conditions and/or legal agreements may be required to ensure no subsequent future use negatively impacts town centres. As Policy E8 will support the performance, growth and resilience of existing and proposed retail and leisure uses within town centres, as well as supporting the general viability and vitality of town centres, it is considered likely to have a significant positive effect on SA objective 4: Economic growth.

Rural policies

6.246 This section presents the appraisals of the following Local Plan policies:

- Policy R1: Rural Exception Sites
- Policy R2: Housing for Rural Workers
- Policy R3: Replacement Dwellings Outside Settlement Confines
- Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines
- Policy R5: Residential Parks
- Policy R6: Employment Development Outside Existing Settlement Confines
- Policy R7: Agriculture, Forestry and Horticulture
- Policy R8: Farm Diversification
- Policy R9: Sustainable Tourism and Visitor Accommodation
- Policy R10: Equestrian Facilities in the Countryside

6.247 The likely effects of the policies in relation to each SA objective are shown in **Table 6.9** and described below the table.

Table 6.9: Likely sustainability effects of the rural policies

SA objective	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10
SA1: Health and well-being	+	+	+	+	+	+	+	0	+	+
SA2: Services and facilities	0	0	0	0	+	0	0	0	+	0
SA3: Education	0	0	0	0	0	0	0	0	0	0
SA4: Economic growth	0	+	0	0	0	++	+	++	++	+
SA5: Biodiversity and geodiversity	0	0	0	0	0	0	0	0	+	0
SA6: Landscape and townscape	+	+	+	+	+	+	+	+	+	+
SA7: Historic environment	0	0	+	+	0	0	0	0	+	0
SA8: Water	0	0	0	0	0	0	0	0	0	0
SA9: Soils	0	+/-	0	+	0	+	+	+	+	+
SA10: Climate change mitigation	0	0	0	0	0	-	-	0	+	0
SA11: Climate change adaptation	0	0	0	0	0	0	0	0	0	0

SA objective	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10
SA12: Pollution	0	0	0	0	0	-	-	0	+	+
SA13: Waste	0	0	0	0	+	0	0	0	0	+
SA14: Housing	+++	+	0	+	+/-	0	0	0	+	0

Policy R1: Rural Exception Sites

6.248 Policy R1 supports small-scale residential development outside the settlement confines on rural exception sites, provided a number of criteria are met. This includes demonstrating an identified need for local housing within the Parish or an adjacent Parish. The policy also requires that such development be secured as affordable housing in perpetuity through a Legal Agreement, ensuring that it continues to meet the needs of local people. The policy will therefore help to deliver affordable homes, supporting access to housing and contributing positively to the well-being of communities. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.249 The policy will bring forward affordable homes to come forward on rural exception sites located either adjacent to existing settlements or in other sustainable locations near a settlement confine. As such, there is potential for development to adversely affect the landscape surrounding those settlements. However, the policy states that the proposed development must keep within the character of any adjoining development and the locality, which will help to conserve the landscape. Therefore, a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.250 The policy supports the development of affordable housing through small scale residential development in rural areas on rural exception sites and so will help to meet the need for affordable housing across the Local Plan area, including benefitting younger people who may not otherwise be able to get on the property ladder. The policy also states that the proposed development should reflect the required housing need in terms of appropriate size, type, tenure, mix and price, and is of high-quality design. Therefore, the policy is expected to have a significant positive effect against SA objective 14: Housing.

Policy R2: Housing for Rural Workers

6.251 Policy R2 permits housing for rural workers outside of settlement confines, subject to stringent conditions. Such housing must demonstrate that there is an essential occupational or functional need for a full-time worker to live permanently at the site, or due to the nature of the business, to be at the site most of the time. Additionally, the business must show that it has been operating for a minimum of three years and is likely to remain financially viable for the near future. This will ensure that housing for rural workers directly supports stable agricultural or rural enterprises, helping to sustain the rural economy while preventing unnecessary

development in the countryside. Additionally, the provision of accommodation for rural workers directly related to rural businesses in the Green Belt can help to provide stable homes for local residents, particularly those working in rural industries, and support employment within these areas. Therefore, the policy is expected to have minor positive effects in relation to SA objectives 1: Health and well-being and 4: Economic growth.

6.252 The policy stipulates that all permanent housing should be of a size that is commensurate with the established functional requirement and sited as close as possible to existing buildings. This is likely to have a minor positive effect against SA objective 6: Landscape and townscape as containing development close to existing buildings will help to minimise the visual impact of new development and protect the wider rural landscape character of the borough.

6.253 The policy allows housing for rural workers outside settlement confines only when suitable accommodation cannot be found nearby or through the re-use or conversion of existing buildings on-site. While developing greenfield land can negatively impact soils, this requirement helps protect soil by restricting new development to cases where no existing options are available, thereby minimising unnecessary land disturbance. A mixed minor positive and minor negative effect is therefore expected against SA objective 9: Soils.

6.254 The provision of accommodation for rural works directly related to rural businesses outside of settlement confines can help to provide stable homes for local residents working in rural industries. The policy is therefore expected to have a minor positive effect in relation to SA objective 14: Housing.

Policy R3: Replacement Dwellings Outside Settlement Confines

6.255 Policy R3 supports replacement dwellings outside of settlement confines subject to meeting a number of criteria, including suitable access, parking and amenity space without harming the living conditions of nearby residents or adversely impact other nearby uses. This will help to create environments for new occupants that contribute to a high quality of life and also ensure that the amenity of nearby residents is safeguarded. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.256 A minor positive effect is also expected against SA objective 6: Landscape and townscape, as the policy provides stringent criteria for replacement dwellings outside settlement confines. Replacement dwellings must be of a comparable size and scale to the existing dwelling and be capable of being accommodated within the footprint of the existing dwelling, unless there are clear benefits from locating the replacement

dwelling in an alternative position, for example landscape, heritage and local amenity. Additionally, the design must respect the character of the area, be sympathetic to its setting in terms of form and massing and be no more visually intrusive than the dwelling it replaces. These requirements will help to maintain the openness, rural character and visual quality of the borough's countryside. A minor positive is also expected in relation to SA objective 7: Historic environment, as the policy supports locating replacement dwellings in alternative positions where this would protect heritage assets.

Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines

6.257 Policy R4 permits the conversion or sub-division of an existing building to residential use outside settlement confines in exceptional circumstances or where the proposal is sufficiently justified and meets a number of criteria. Residents of the existing building must be able to safely access sustainable transport options to access services and facilities in a nearby settlement, which will include healthcare facilities. This will also help to support the physical health and mental well-being of residents by encouraging active travel. Additionally, the policy stipulates that any curtilage of the dwelling will be restricted to that which is necessary to facilitate parking or provide a reasonable level of amenity garden space. The provision of amenity garden space will help to support healthier lifestyles for occupants by improving their mental and physical well-being through their connection with a green space. As such, the policy is expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.258 The conversion of existing buildings to residential use outside of settlement confines is likely to place residents further from key services and facilities. This would likely result in a minor negative effect in relation to SA objective 2: Services and facilities. However, the policy stipulates that residents of the existing building should be able to safely access sustainable transport options to access services and facilities in a nearby settlement. Therefore, the minor negative effect against SA objective 2: Services and facilities is upgraded to a negligible effect.

6.259 The policy supports the conversion or sub-division of an existing building to residential use outside settlement confines where the building can achieve conversion or sub-division without requiring extension or alteration including new buildings. By focusing on the re-use of existing buildings, the policy reduces the pressure for new development in the countryside, which will limit the adverse visual impacts associated with new development in rural landscapes. A minor positive effect is therefore expected against SA objective 6: Landscape and townscape by ensuring

that development respects existing building form and protects the character of the countryside.

6.260 The policy stipulates that the proposal must not have an adverse effect on the character, appearance or features that are of historic interest, including their settings. As such, the policy is expected to have a minor positive effect in relation to SA objective 7: Historic environment.

6.261 The policy supports the conversion or sub-division of an existing building to residential use outside settlement confines, stipulating that the building should achieve conversion or sub-division to residential use without requiring extension or alteration, including new buildings. The policy therefore encourages the use of brownfield land through the conversion and re-use of an existing building, which will limit development on greenfield land. The policy is therefore expected to have a minor positive effect against SA objective 9: Soils.

6.262 The policy supports the conversion or sub-division of an existing building to residential use outside settlement confines. This is likely to have a minor positive effect against SA objective 14: Housing by supporting rural community housing needs.

Policy R5: Residential Parks

6.263 Policy R5 supports the siting of new caravans within settlement confines or small-scale extensions to existing sites, provided they are sympathetic to the amenity of neighbouring properties. This will help protect residential amenity, with positive effects on well-being. The policy also requires there to be no unacceptable adverse effect on public safety. Overall, therefore, Policy R5 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.264 Policy R5 supports the siting of new caravans within settlement confines. Therefore, it is likely these caravans will be in close proximity to the services and facilities present within that settlement, although this is dependent on the settlement in which the caravan is located. As such, a minor positive effect is expected in relation to SA objective 2: Services and facilities, with some uncertainty.

6.265 The policy stipulates that proposals for new caravans and small-scale extensions to existing sites must not have an adverse impact on the local character, including the character and appearance of the countryside. In relation to small-scale extensions to existing sites, proposals must not harm the openness and character of the Green Belt in terms of scale, location and design, and accords with national

Green Belt policy. Therefore, the policy is expected to have a minor positive effect against SA objective 6: Landscape and townscape.

6.266 A minor positive effect is expected in relation to SA objective 13: Waste as the policy requires proposals for new caravans and small-scale extensions to provide storage areas for waste and recycling.

6.267 The policy is expected to have a minor positive effect against SA objective 14: Housing as it supports proposals for new caravans within settlement confines and small-scale extensions to existing sites which will contribute to meeting housing needs and promoting diversity within the housing market. However, the policy's stringent criteria for caravan parks could also potentially limit the availability and scale of suitable sites. Therefore, the minor positive effect received for this policy against SA objective 14: Housing is coupled with a minor negative effect.

Policy R6: Employment Development Outside Existing Settlement Confines

6.268 Policy R6 supports the intensification or extension of employment development, and the re-use of existing rural buildings for business use despite being located outside of settlement confines, thereby supporting the diversification and enhancement of the rural economy. As such, the policy is expected to increase the number and range of rural job opportunities available. This has the potential to benefit the health and well-being of people in rural communities in the borough, and the policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.269 The policy is expected to have a significant positive effect in relation to SA objective 4: Economic growth as its overarching aim is to support employment development outside existing settlement confines. In relation to the intensification and extension of existing employment development, the policy supports proposals which demonstrate a need to facilitate new or expanding operational functions, and it can be demonstrated that the business premises is operating at full occupancy. This will help to meet increasing demand at existing employment sites by scaling-up businesses and creating new job opportunities, thereby supporting economic vitality. Additionally, the policy supports the re-use, conversion or adaptation of existing redundant rural buildings for business use that are currently or were last used for employment use. The rural building which will be used for a new business must contribute positively to the rural economy through the provision of local employment opportunities. This will help to further support local economic growth.

6.270 The policy stipulates that proposals for the intensification or extension of existing employment development must be of a scale that is consistent with the proposed use and the existing size and scale of the site and is also acceptable considering the character of the area. For both the intensification or extension of existing employment development, and the re-use of existing rural buildings for business use, proposals must not harm the openness and character of the Green Belt in terms of scale, location and design, and comply with national Green Belt policy. The policy will therefore support economic development which respects and integrates with the surrounding landscape and protects the openness and rural character of the borough's Green Belt. The policy's support for the re-use of existing redundant rural buildings will help to reduce the pressure for new employment development in the countryside. This will help to limit the adverse visual impacts associated with new development in the countryside. Therefore, a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.271 The policy supports development proposals that seek to re-use, convert or adapt existing redundant rural buildings for business use. These buildings must be permanent and structurally sound and capable of re-use, conversion or adaptation without major re-building, alterations or extensions. This will help to conserve and enhance soil resources by supporting a more efficient use of land resources and limiting development on greenfield land. As such, a minor positive effect is expected for the policy in relation to SA objective 9: Soils.

6.272 Employment development outside settlement confines is likely to result in increased traffic generation, although the policy acknowledges that proposals should not generate an inappropriate amount or type of additional traffic movements and the site's existing vehicular access and parking provision is suitable or can be made suitable. However, any increase in car use is likely to have minor negative effects in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

Policy R7: Agriculture, Forestry and Horticulture

6.273 Policy R7 supports development proposals for new buildings or structures for the purpose of agriculture, forestry, horticulture and other rural land-based uses. In supporting and enhancing the rural economy, the policy is expected to increase the number and range of rural job opportunities, which could improve the general health and well-being for rural communities. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being.

6.274 Policy R7 is expected to have a minor positive effect in relation to SA objective 4: Economic growth, as it supports proposals for buildings required for agriculture,

forestry or other land-based rural business purposes, which will help to support the future growth of the rural economy.

6.275 The policy supports new buildings and structures for the purpose of agriculture, forestry, horticulture and other rural land-based uses, prioritising the re-use and adaptation of existing buildings before new development is considered. Where new buildings are necessary, they must be appropriately sited, scaled and designed to respect rural distinctiveness and farmstead groupings, and also retain the agricultural character of the site. Therefore, Policy R7 is expected to have a minor positive effect in relation to SA objective 6: Landscape and townscape. By prioritising the re-use and adaptation of existing buildings, the policy will help to limit greenfield land use and therefore a minor positive effect is also expected in relation to SA objective 9: Soils.

6.276 The impact of an enhanced rural economy is likely to have minor negative effects in relation to SA objectives 10: Climate change mitigation and 12: Pollution, as they could encourage greater use of cars in rural areas where there are fewer public transport links and easily accessible active travel routes, with adverse effects on air pollution. There is also some potential for agricultural activities to harm air quality in the Local Plan area due to ammonia and nitrous oxide emissions.

Policy R8: Farm Diversification

6.277 Policy R8 supports proposals for farm diversification, which will help to maintain the commercial viability of farm enterprises and support the wider rural economy. The policy requires development to provide local employment opportunities and states that proposals must sustain the long-term future of an established agricultural business and result in positive and long-term benefits to the rural economy. Overall, Policy R8 is expected to have a significant positive effect in relation to SA objective 4: Economic growth.

6.278 According to Policy R8, development must retain the agricultural character of a site and be of an appropriate scale and design. Further to this, the design and/or location of the building must respect rural distinctiveness and farmstead groupings. Reference is also made to national Green Belt policy and the fact proposals should not harm the openness and character of the Green Belt, in terms of scale, location and design. Overall, a minor positive effect is expected in relation to SA objective 6: Landscape and townscape.

6.279 According to Policy R8, proposals must avoid the loss of best and most versatile agricultural land where possible. Further to this, the policy seeks to prioritise the use of existing buildings which is an efficient use of previously developed land.

Overall, therefore, Policy R8 is expected to have a minor positive effect in relation to SA objective 9: Soils.

Policy R9: Sustainable Tourism and Visitor Accommodation

6.280 Policy R9 supports the delivery of new tourism facilities, including visitor accommodation, provided they are within settlement confines. Depending on the settlement, this may help ensure guests can easily reach amenities. According to the policy, the location of the proposal must be accessible using sustainable modes of transport, including walking, cycling and wheeling. This will help encourage more physical exercise with positive effects on people's physical health and mental well-being. Therefore, Policy R9 is expected to have a minor positive effect in relation to SA objective 1: Health and well-being. The proximity of facilities to sustainable modes of transport may also help ensure easy access to services and facilities and so a minor positive effect is also expected in relation to SA objective 2: Services and facilities.

6.281 Policy R9 supports tourism through the provision of tourism facilities, including visitor accommodation. These facilities should closely relate to or be closely associated with an existing visitor attraction or tourism use that is seeking to expand. This will help contribute to the retention or enhancement of these facilities and the borough's overall tourism offer. Policy R9 also requires proposals to not detract from the vitality and viability of town and village centres. Overall, therefore, a significant positive effect is expected in relation to SA objective 4: Economic growth.

6.282 Policy R9 requires proposals, either alone or cumulatively, to not detract from the experience of visitors or adversely affect the character, historic significance, landscape, natural environment, appearance or amenity of the area. This will help protect the natural and built environment, and so minor positive effects are expected in relation to SA objectives 5: Biodiversity and geodiversity, 6: Landscape and townscape and 7: Historic environment. In terms of protecting the landscape, the policy requires proposals to accord with national Green Belt policy.

6.283 Policy R9 requires proposals to make the best use of existing buildings. This is an efficient use of previously developed land and so a minor positive effect is expected in relation to SA objective 9: Soils.

6.284 Tourism facilities must be provided within settlement confines, in a location accessible via walking, cycling and wheeling. This has the potential to help minimise private car travel and associated greenhouse gas emissions and so a minor positive effect is expected in relation to SA objective 10: Climate change mitigation.

Minimising private car travel may also help protect air quality and so a minor positive effect is also expected in relation to SA objective 12: Pollution.

6.285 As the tourism facilities include accommodation, the accommodation needs of tourist are likely to be met and so a minor positive effect is expected in relation to SA objective 14: Housing.

Policy R10: Equestrian Facilities in the Countryside

6.286 Policy R10 supports equestrian development in the countryside, which can provide recreational and commercial opportunities. As such, minor positive effects are expected in relation to SA objectives 1: Health and well-being and 4: Economic growth.

6.287 The policy emphasises high standards of design, ensuring that the scale of equestrian facilities are no more than is reasonably required for the proper functioning of the enterprise or the use of the land to which they are associated, and ensuring that equestrian facilities are unobtrusively located and designed so as to not introduce a prominent urban element into the countryside, including the impact of any new or improved access and car parking areas. This will help to limit such facilities from giving rise to unacceptable visual impacts on the countryside. Additionally, the policy stipulates that structures, engineering works and buildings serving equine uses should be removed from the site when they are no longer in use and are no longer required to serve the equine use of the land. This will limit the visual impact of redundant structures. A minor positive effect is therefore expected in relation to SA objective 6: Landscape and townscape.

6.288 The policy priorities the re-use, adaptation and conversion of existing buildings within the site, with new buildings or structures proposed only where the re-use, adaptation or conversion of existing buildings is not viable or practical. This will help to limit the take-up of greenfield land, which would help to minimise ground disturbance and soil erosion. Additionally, the policy stipulates that structures, engineering works and buildings serving equine uses should be removed from the site when they are no longer in use and are no longer required to serve the equine use of the land. This will allow for the restoration of soils, and therefore a minor positive effect is expected in relation to SA objective 9: Soils.

6.289 The policy seeks to ensure that proposals for equestrian facilities in the countryside do not lead to increases in light pollution and will not result in ground contamination or pollution risk associated with waste. Alongside this, the proposal must be accompanied by a waste management plan. Therefore, minor positive effects are expected in relation to SA objectives 12: Pollution and 13: Waste.

Infrastructure

6.290 This section presents the appraisals of the following Local Plan policies:

- 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

6.291 The likely effects of the policies in relation to each SA objective are shown in Table 6.10 and are described below the table.

Table 6.10: Likely sustainability effects of the infrastructure policies

SA objective	INF1	INF2	INF3	INF4	INF5
SA1: Health and well-being	+	+	+	++	++
SA2: Services and facilities	++	+	+	++	++
SA3: Education	+	0	0	0	0
SA4: Economic growth	+	0	0	+	0
SA5: Biodiversity and geodiversity	0	0	0	0	+
SA6: Landscape and townscape	0	0	0	+	0
SA7: Historic environment	0	0	0	0	0
SA8: Water	0	0	0	0	+
SA9: Soils	0	0	0	+	0
SA10: Climate change mitigation	+	+	+/-	0	+
SA11: Climate change adaptation	0	+	0	0	+

SA objective	INF1	INF2	INF3	INF4	INF5
SA12: Pollution	+	+	+/-	0	+
SA13: Waste	0	0	0	0	0
SA14: Housing	0	0	0	0	0

Policy INF1: Provision of Infrastructure and Services

6.292 Policy INF1 supports the delivery of new infrastructure and services and improvements to existing infrastructure and services, where there is an identified need. The policy stipulates that new developments will be required to consider their impact upon the capacity of existing infrastructure services, and planning permission will only be granted where it can be demonstrated that there is or will be sufficient infrastructure and services to meet the requirements arising from the proposed development. The delivery of infrastructure to support development, such as healthcare and education facilities will help to sustain communities and ensure that residents benefit from necessary services and facilities. The policy also states that new facilities should be easily accessible by existing or new and improved active transport, such as public transport and walking routes. This has the potential to encourage more walking and cycling, which can have beneficial effects on people's physical health and mental well-being. The policy is therefore expected to have a minor positive effect in relation to SA objective 1: Health and well-being. As the main purpose of this policy is to provide infrastructure and services, a significant positive effect is expected against 2: Services and facilities.

6.293 The policy is expected to have a minor positive effect in relation to SA objective 3: Education as it supports the provision of new education facilities in locations that relate well to both existing and new development. This will help to ensure that education facilities are accessible to communities.

6.294 The policy stipulates that applicants must work with commercial providers at an early stage to provide broadband and mobile connectivity within their housing and employment developments, ensuring high speed connections and sufficient mobile telecommunications coverage are available. The policy is therefore expected to have a minor positive effect in relation to SA objective 4: Economic growth, as reliable digital infrastructure will help to support remote working which will help to improve economic activity.

6.295 The policy supports development that encourages or provides carbon neutral utilities schemes that contribute to helping the Council meet its carbon neutral target. The policy also encourages the use of public transport and active travel, including walking and cycling, to reach new healthcare, education facilities and other services. These facilities should be located to integrate well with both existing and new development. This will help to support reduced travel distances and reduce reliance on the private car and associated greenhouse gas emissions. Therefore, a minor positive effect is expected in relation to SA objective 10: Climate change mitigation. Reduced reliance on the private car is also likely to minimise associated air pollution and therefore a minor positive effect is expected in relation to SA objective 12: Pollution.

Policy INF2: Sustainable Transport and Active Travel

6.296 Policy INF2 sets out that development should contribute towards delivery of a sustainable transport network, reducing reliance upon private motor vehicles and prioritising active travel. In relation to public transport and active travel, the policy stipulates that site promoters should prioritise supporting and enhancing existing bus services, especially those connecting rural service centres and larger villages, and include measures for on-site PRow improvements for walking, wheeling and cycling. Developments should also protect and enhance off-site PRow to achieve a high-quality network of routes for walking, wheeling, cycling and equestrian use. The policy specifies that active travel infrastructure should be accessible and inclusive and that cycleways should provide enough space for adapted cycles such as tricycles, tandems, wheelchair cycles. These measures are expected to have a minor positive effect in relation to SA objective 1: Health and well-being, by increasing people's likelihood of actively travelling which will benefit their mental and physical health through more active lifestyles.

6.297 The policy seeks to ensure that developments are well-linked to public transport and active travel networks, including supporting rail services through improved access and station facilities that make it more desirable, convenient and safer for passengers to undertake linked non-car journeys. This will help residents to reach key services and facilities, including healthcare, education, and employment opportunities more easily without relying on private cars. As such, a minor positive effect is expected in relation to SA objective 2: Services and facilities.

6.298 The policy stipulates that in terms of traffic and highway design, development will be supported where the nature and level of traffic can be accommodated without adversely impacting upon the safety, amenity or character of the surrounding area. This is likely to have a minor positive effect in relation to SA objective 6: Landscape

and townscape, as it will help to ensure that transport infrastructure is integrated sensitively within its setting, preserving local character.

6.299 The policy seeks to reduce the need to travel by private vehicle by encouraging the delivery of high-quality routes for walking, wheeling, cycling and equestrian use, supporting access and rail station facility improvements, and promoting development design and layout that encourages slower driving speeds and prioritises non-motorised travel to foster sustainable transport use. By supporting reliance on the private car, the policy will help to lower greenhouse gas emissions and air pollution. The policy is therefore expected to have minor positive effects against SA objectives 10: Climate change mitigation and 12: Pollution.

Policy INF3: Parking

6.300 Policy INF3 requires new development to consider and provide adequate and well-integrated parking of all types of vehicles, taking account of Kent County Council's Parking Standards. The policy also requires parking design to reflect local circumstances, including proximity and accessibility to public transport, levels of car ownership and local travel patterns. This will ensure that future transport network and parking needs are facilitated, while also ensuring that new parking provision is informed by the transport needs of the existing active travel and public transport provision. The policy stipulates that new parking provision should consider public transport accessibility and include an appropriate level of disabled parking, parking for mobility aids, parking for adaptive bicycles and provision of electric vehicle and bike charging. The policy therefore supports greater use of walking, cycling and other non-car travel, which can improve physical health and enhance mental well-being. This will also help to ensure that residents can reach services and facilities without full car dependency. The policy is therefore expected to have minor positive effects in relation to SA objectives 1: Health and well-being and 2: Services and facilities.

6.301 The policy states that for residential developments, the consideration of the amount, location, layout and design of parking will be required to be considered at an early stage, and as an integral part in the design of the development. Parking provision must be appropriate to the development and designed so as not to detract from the quality or character of the public realm. This is expected to have a minor positive effect against SA objective 6: Landscape and townscape by ensuring that new parking provision does not result in adverse impacts on surrounding areas.

6.302 The policy supports parking for all types of vehicles, including adaptive bicycles and electric vehicles. It states that parking storage for bicycles, e-bicycles and motorcycles should be provided in accordance with Kent County Council guidance. The policy also supports a reduced need to travel by private vehicle by

considering local circumstances in relation to new parking provision, such as how to encourage travel by sustainable modes of transport. This could help to lower greenhouse gas emissions and air pollution associated with private car use. However, the provision of new parking may also perpetuate car dependency, which could also contribute to increased greenhouse gas emissions and pollution. Therefore, the policy is expected to have mixed minor positive and minor negative effects in relation to SA objectives 10: Climate change mitigation and 12: Pollution.

Policy INF4: Community Facilities

6.303 Policy INF4 supports the retention, extension and provision of new community facilities, particularly in areas where there are poor levels of provision and where community facilities are required to meet identified needs arising from new development. The policy also safeguards existing community facilities, allowing loss only if equivalent services are available nearby or replaced with a facility of equal or greater value. The policy includes criteria for proposals for new or improved community facilities, requiring provision within, adjoining or physically near to a built-up settlement confines boundary, unless it can be demonstrated that the proposed location is the only suitable option, is well-related to the community it will serve and will ensure that the character of the area is not harmed. Additionally, facilities must be accessible to the majority of the community by walking or wheeling. This will help to ensure that those with the greatest need are well-served. Additionally, improved access to community facilities via active travel will help to promote healthier and more active lifestyles. The policy also includes criteria in relation to inclusive use, noting that community facilities must be designed to ensure that all potential users can access the facility and provide public toilets suitable for childcare and people with disabilities. This will ensure that there is equal opportunity and access to community facilities. The policy is therefore expected to have significant positive effects in relation to SA objectives 1: Health and well-being and 2: Services and facilities.

6.304 The policy supports designing community facilities for flexible use and shared purposes, to encourage a range of uses and activities, and to ensure adaptability if demand for the facility changes. Additionally, the policy stipulates that where development would result in the loss or partial loss of a community facility, it will not be permitted unless it is demonstrated that the facility has been vacant for 18 months and it can be demonstrated via an active marketing campaign that there is no current or alternative use demand for the facility. This is likely to have a minor positive effect in relation to SA objective 4: Economic growth, as it allows for alternative uses that better support the local economy.

6.305 The policy states that where new and additional community facilities cannot be provided within, adjoining or physically near to a built-up settlement boundary, provision may be located elsewhere if it can be demonstrated that the proposed location is the only suitable option. The site must be well-related to the community it will serve and form part of an existing group of buildings to ensure the character of the area is preserved. As such, the policy is expected to have a minor positive effect against SA objective 6: Landscape and townscape.

6.306 The policy promotes designing community facilities for flexible use and facility sharing. This will help to reduce the need for additional development to support different activities. A minor positive effect is expected against SA objective 9: Soils, as sharing facilities will allow for a better use of space and resources, supporting a more efficient use of land resources.

Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision

6.307 Policy INF5 supports the provision of new and enhanced high quality open space, sports and recreation provision, and the protection of existing assets. The policy stipulates that residential developments of six or more dwellings will be required to provide or contribute towards the provision or improvement of open space, sports and recreation facilities. Additionally, proposals for sport provision will be supported where they meet the needs of the local community and/or unmet need within the borough. The Council will use the Sport England's Sports Facility Calculator and Playing Pitch Calculator to help determine whether a development will be required to provide new provision or contribute to existing provision. This will ensure that residents and visitors have adequate access and provision of sports, recreational facilities and open space. This will promote healthier lifestyles for local communities by improving their mental and physical well-being through increased exercise, social interactions and their connection with nature and open greenspace. As such, the policy is expected to have significant positive effects in relation to SA objectives 1: Health and well-being and 2: Services and facilities.

6.308 The policy states that the provision and design of new open space, sports and recreation provision will be expected to include opportunities for habitat creation. The provision of new open space will also likely improve access to green infrastructure. However, it is acknowledged that using spaces for sports and recreational purposes can sometimes have adverse effects on biodiversity. The policy is therefore expected to have a minor positive effect against SA objective 5: Biodiversity and geodiversity.

6.309 A minor positive is expected for the policy against SA objective 8: Water as the provision and design of new open space, sports and recreation provision will be expected to create opportunities for sustainable urban drainage, thereby helping to manage surface water runoff in relation to new development.

6.310 The policy supports the high-quality provision of open space on-site. Where provision is negotiated off-site, contributions will be sought to provide or improve open space within the ward or nearby ward to which the development is located, to ensure provision is locally specific. Additionally, the provision of new open space, sports and recreation provision must be sustainably located. This will help to encourage access by walking, cycling and public transport, reducing reliance on private vehicles. Additionally, the policy supports the use of lighting including LED lights, which will help to reduce greenhouse gas emissions as they consume less energy than traditional lighting options. A minor positive effect is therefore expected in relation to SA objective 10: Climate change mitigation.

6.311 The provision of new open space is likely to have a minor positive effect in relation to SA objective 11: Climate change adaptation as open spaces will strengthen the natural environment to help mitigate against flood risk and urban heating by increasing permeable land cover and canopy cover.

6.312 The policy's support for sustainably located publicly accessible open space may encourage the use of sustainable travel options, such as walking, cycling and public transport, which can help to reduce air pollution. A minor positive effect is therefore expected against SA objective 12: Pollution.

Development Allocations

6.313 Policy A1: Housing and Employment Allocations sets out the sites that are proposed for housing and employment development. Tables 6.11 and 6.12 set out the likely effects of the site allocations. For the sites that remain unchanged since they were considered as options in Chapter 5, the effects identified here mirror those in Chapter 5. For some of the sites the effects are slightly different due to boundary changes made when the sites were allocated or due to multiple smaller sites being combined into one allocation.

Table 6.11: SA findings for the residential site allocations

Site ID	Site name	Corresponding LAA site(s)	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
AY1	Land at Aylesford Lakes, Aylesford	59675, 59676, 59763, 59678	++	0	+	0	--?	-?	--?	--?	--	++	N/A	0	-?	++
AY2	Land south of High Street, Aylesford	58499, 59674	+	++	++?	0	--?	-?	--?	-?	-	++	N/A	0	-?	+
AY3	North of Pratling Street, Aylesford	68428	+	0	+	0	-?	--?	--?	-?	--?	-	N/A	0	-?	+
AY4	Land east of 4 Pratling Street and south of Pratling Street, Aylesford	68406	--?/+	0	+	0	-?	-?	--?	-?	--?	+	N/A	0	-?	+
BG1	Land North of Borough Green, Sevenoaks	59830, 59732	++	++	++?	0	--?	--?	--?	--?	++/--?	++	N/A	0	-?	++
BG2	Land South and West of Tillmans Off, Crouch Lane, Sevenoaks	59843	++	++	+	0	-?	--?	--?	-?	--?	++	N/A	0	-?	+
EC1	Land Opposite Hale House, Pilgrims Way, Aylesford	59702	++	0	+	0	--?	--?	--?	0	--	+	N/A	0	0	+
EM1	Paris Farm, Rocks Road, East Malling	58576	+	+	++?	0	-?	-?	--?	-?	--	++	N/A	0	-?	++
EP1	Land West of Addlestead Road, East Peckham, Tonbridge	59613	+	+	+	0	0?	-?	--?	-	--	+	N/A	0	0	+
EP2	Land South of Church Lane, Hale Street	58751, 59789, 68376	+	+	+	0	0?	-?	--?	--?	--	+	N/A	0	0	++
HA1	Land North of The Paddock and East of Carpenters Lane, Tonbridge	59776	++	+	++?	0	-?	-?	--?	0	--?	-	N/A	0	-?	++
HA2	Land South of Common Road, Hadlow	59842	++	+	+	0	-?	-?	--?	-	--?	+	N/A	0	0	++
HA3	Land North of Court Lane, Hadlow	59647, 68365	++	+	++?	0	-?	-?	--?	0	--	+	N/A	0	0	+
HA4	Court Lane Nurseries, Court Lane, Hadlow, Tonbridge	68449	++	+	+	0	-?	-?	--?	0	++/--	+	N/A	0	0	+
HI1	East of Riding Lane, Hildenborough	59896	++	+	+	0	-?	-?	--?	--	-	+	N/A	0	0	+
HI2	Land off Stocks Green Road, Hildenborough	59653, 59615, 59692, 68432	++	++	+	0	-?	-?	--?	0	--?	++	N/A	0	0	++
HS1	Land west of Hale Street, East Peckham, Tonbridge	59782	+	0	+	0	-?	-?	--?	0	--	+	N/A	0	0	++
IG1	Land Known as Churchfields Farm and Coney Field, Fen Pond Road, Ightham	59871	+	0	+	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
IG2	Land South of Bramleys, Rectory Lane, Ightham, Sevenoaks	59770	+	0	+	0	-?	--?	--?	-?	--?	-	N/A	0	-?	+
KH1	Land at Broadwater Farm, Kings Hill, West Malling	59740, 59634	++	++	+	0	--?	-?	--?	0	--	+	N/A	0	-?	++
KH2	Land West of King Hill and Northwest of Ashton Way / Malling Road roundabout, West Malling	59603	+	++	+	0	-?	-?	-?	0	--	+	N/A	0	-?	+
KH3	Existing premises at 1 Tower View, Kings Hill, West Malling	68437	++	++	+	0	--?	0	--?	0	++	+	N/A	0	-?	+
KH4	Existing premises at 42 Kings Hill Avenue, Kings Hill	68448	++	++	+	0	-?	0	-?	0	++	+	N/A	0	-?	+
KH5	Existing premises at 11 Tower View, Kings Hill, West Malling	68450	++	++	+	0	-?	0	-?	0	++	+	N/A	0	-?	+
KH6	Existing premises at 32 Tower View, Kings Hill, West Malling	68443	++	++	+	0	0?	0	--?	0	++	+	N/A	0	-?	+
KH7	Existing premises at 34 Tower View, Kings Hill, West Malling	68447	++	++	+	0	0?	0	--?	0	++	+	N/A	0	-?	+
MG1	Land Off Hall Road, Royal British Legion Industries, Aylesford	59781	++	++	++?	0	-?	0	--?	-	++	++	N/A	0	-?	+

Site ID	Site name	Corresponding LAA site(s)	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
MG2	Existing premises at Heart of Kent Hospice, Preston Hall, Aylesford	68351	++	++	-?	0	-?	0	--?	0	++	+	N/A	0	-?	+
MG3	Land At Bunyards, Beaver Road, Allington, Maidstone	59852	++	++	++?	0	-?	-?	-?	-?	--	++	N/A	0	-?	++
MG4	Land east of Kiln Barn Road and west of Hermitage Lane, Aylesford	59861	++	++	-?	0	--?	-?	-?	-?	--	++	N/A	0	-?	++
MG5	Existing premises at 56 to 62 Martins Square, Larkfield	59953	++	++	++?	-	0?	0	--?	-?	++	+	N/A	0	-?	+
MG6	Land adjacent to Larkfield Library	58550	++	++	++?	0	-?	0	--?	-?	++/-	+	N/A	--	-?	+
MG7	Land Between Ashton Way and London Road, Leybourne, West Malling	59756, 59844	++	++	+++?	0	--?	-?	--?	0	--	++	N/A	0	-?	+
MG8	Winterfield Farm, East Malling	58538	++	++	+++?	0	-?	-?	--?	0	--	++	N/A	0	-?	+
PL1	Rear of Platt Mill Close, Platt	58613	+	++	++?	0	-?	--?	--?	-?	--?	+	N/A	0	-?	+
PL2	Land South of Potash Lane and North of Paddock Orchard, Platt	59617	+	0	++?	0	-?	-?	--?	-?	--	-	N/A	0	-?	+
RY1	Holmes Paddock, Ryarsh	58665	+	0	++?	0	-?	--?	--?	-?	--	+	N/A	0	-?	+
SN1	Land north of Holborough Lakes, Snodland	68423	++	++	++?	0	--?	--?	--?	0	--	+	N/A	0	0	++
TO1	Land north east of Tonbridge	59721, 59690, 59693, 59685, 68388, 59690	+	++	+++?	0	-?	-?	-?	--?	--	+	N/A	0	0	++
TO10	The River Centre, Tonbridge	58846	++	++	+++?	0	-?	0	--?	--?	++	++	N/A	0	0	++
TO2	Coblends Nursery and Little Trench Farm, Trench Road, Tonbridge	59746, 59625	++	++	+++?	0	-?	-?	-?	--?	--?	+	N/A	0	-?	++
TO3	Hilden Farm Road, Tonbridge	59745	+	++	++?	0	-?	-?	--?	0	--?	+	N/A	0	-?	+
TO4	Land north west of Hilden Park, Tonbridge	59893, 68401	++	++	++?	0	-?	-?	--?	--?	--?	+	N/A	0	0	++
TO5	Land at south west Tonbridge	59765, 68456	+	++	+++?	0	-?	--?	--?	--?	--?	+	N/A	0	-?	++
TO6	Land Adjacent to Vauxhall Gardens and The Vauxhall Inn, Vauxhall Lane, Tonbridge	68419	++	++	+++?	0	-?	--?	--?	0	-	+	N/A	0	-?	+
TO7	Land North of Priory Road, South of The Railway, Tonbridge	59878	++	++	+++?	0	0?	--?	--?	-?	++	++	N/A	0	0	++
TO8	Angel Centre, Tonbridge	68472	++/- ?	++	+++?	0	0?	0	--?	--?	++	++	N/A	0	0	+
TO9	Sovereign Way North, Tonbridge	68471	++	++	+++?	0	-?	--?	--?	--?	++	++	N/A	0	0	++
WA1	Land East of Red Hill, Watlington, Maidstone	59654	++	+	++?	0	-?	-?	--?	-?	--	++	N/A	--	-?	+
WO1	Land At Wouldham Allotments and Rear of Oldfield Drive, Wouldham, Rochester	68436	+	+	++?	0	-?	--?	--?	0	--	+	N/A	0	0	+
WR1	Land South of London Road and Rear of Howlands Court, Wrotham, Sevenoaks	68372	+	0	++?	0	-?	--?	--?	-?	--?	-	N/A	0	0	+

Table 6.12: SA findings for the employment site allocations

Site ID	Site name	Corresponding HELAA site(s)	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
E1	Celcon Works, Borough Green	58631	+	++	N/A	++	-?	--?	--?	--?	++	++	N/A	--	-?	N/A
E2	East Malling Research Station, New Road, East Malling	59856	+	-	N/A	++	-?	--?	-?	-?	--	-	N/A	0	-?	N/A
E3	Land south of Hermitage Court, Hermitage Lane, Maidstone	59738	+	-	N/A	+	-?	--?	-?	0	--	+	N/A	0	-?	N/A
E4	Land East of Coldharbour Lane (Junction 5 of M20) and south of M20, Aylesford	68444	+	++	N/A	++	--?	-?	-?	-?	--	+	N/A	0	-?	N/A
E5	Land at Spider Hall, Bull Road, Leybourne, West Malling	59863	+	-	N/A	++	-?	--?	-?	-?	--	+	N/A	0	-?	N/A
E6	Land East of Platt Industrial Estate, Platt	59822	+	0	N/A	+	--?	--?	-?	-?	--?	+	N/A	0	-?	N/A
E7	Land west of Hays Road, Snodland	59874	+	++	N/A	+	-?	--?	--?	-?	--?	+	N/A	0	-?	N/A
E8	Land at Sanderson Way and Little Postern, Tonbridge	68358, 68414	+	++	N/A	++	-?	--?	--?	--?	--?	+	N/A	0	-?	N/A
E9	Land west of Rochester Airport, Rochester	68412	+	++	N/A	+	-?	--?	-?	-?	++	+	N/A	0	0	N/A

Recommendation in early draft SA Report

- Policy SP1: Spatial Strategy could refer to biodiversity mitigation measures, specifically outlining how the protection of biodiversity has been considered within the policy.

Council's response

6.314 Addressed in the final policy wording.

Recommendation in early draft SA Report

- Policy SP1: Spatial Strategy could require development to have no adverse effects on the capacity or water quality of any watercourse or floodplain, recognising the flood risk in many parts of the borough.

Council's response

6.315 Addressed in the final policy wording.

Recommendation in early draft SA Report

- Policy SP5: Employment Needs could also include measures to promote active and public transport connectivity to new employment sites.

Council's response

6.316 Not considered appropriate due to the nature of the policy.

Recommendation in early draft SA Report

- Policy SP6: Town Centre Needs could expand further to detail how the retail offer in the borough will be strengthened, for example encouraging leisure, cultural, and commercial opportunities, and the development of the evening economy.

Council's response

6.317 Added to policy SP1 instead.

Recommendation in early draft SA Report

- Policy CC2: Circular Economy could explicitly address how historic buildings could be made more resilient to climate change. The policy could encourage adaptive re-use and retrofit measures that improve energy and carbon efficiency.

Council's response

6.318 The Council considers this to be already covered in the policy wording.

Recommendation in early draft SA Report

- Policy CC6: Water Efficiency could recognise the role of water re-use and rainwater harvesting in reducing surface water runoff.

Council's response

6.319 The Council considers this to be already covered in the policy wording.

Recommendation in early draft SA Report

- Policy CC7: Managing Development within Flood Risk Areas could require development proposals to have no adverse effects on the capacity or water quality of any watercourse or floodplain.

Council's response

6.320 The Council considers this to be already covered in the policy wording. However, additional text has been added to criterion e.

Recommendation in early draft SA Report

- Policy CC8: Sustainable Drainage Systems (SuDS) could reference different forms of SuDS, for example green roofs, swales and rain gardens

Council's response

6.321 Examples have been included in the introductory text.

Recommendation in early draft SA Report

- Policy NE8: Best and Most Versatile Agricultural Land could include a requirement to minimise disturbance to soils and protect soil biodiversity during construction, specifically in the exceptional circumstances where development on BMV land is permitted.

Council's response

6.322 Added to policy at point 7.

Recommendation in early draft SA Report

- Policy HE1: The Historic Environment could require the demolition of heritage assets granted in exceptional circumstances to be fully recorded and archived with the Kent County Council Historic Environment Record.

Council's response

6.323 Added to point 7 of the policy.

Recommendation in early draft SA Report

- Policy HE4: Historic Parks and Gardens (designated and non-designated) could acknowledge the role of historic parks and gardens as valuable green spaces despite the costs associated with accessing them, encouraging development proposals to enhance access routes to the Historic Parks and Gardens.

Council's response

6.324 The Councils considers this to be covered by the Green Infrastructure policy.

Recommendation in early draft SA Report

- Policy HE4: Historic Parks and Gardens (designated and non-designated) could stipulate that development proposals affecting historic parks and gardens will be supported where they maintain, conserve, or enhance biodiversity.

Council's response

6.325 The Council considers this to be covered by the Biodiversity policy.

Recommendation in early draft SA Report

- Policy HE6: Enabling Development for Heritage Assets could include examples of acceptable forms of enabling development.

Council's response

6.326 Not considered appropriate as this is case dependent.

Recommendation in early draft SA Report

- Policy D2: Design Codes and Masterplans could refer to the principles of low-carbon design.

Council's response

6.327 The Council considers this to be covered by the Climate Change policies.

Recommendation in early draft SA Report

- Policies H4: Gypsy, Traveller and Travelling Showpeople – Safeguarding Sites and H5: Gypsy, Traveller and Travelling Showpeople – Site Criteria could be combined into a single policy.

Council's response

6.328 The Council's preference is to retain two separate policies.

Recommendation in early draft SA Report

- Clarity could be provided on what is meant by the "live-work lifestyle for Travellers" under Policy H5.

Council's response

6.329 Policy has been updated in accordance with PPTS definition.

Recommendation in early draft SA Report

- Clarity could be provided on what is meant by "an improvement to the environment" under Policy E3: Other Employment Sites, Premises and Floorspace. It is not clear whether the policy is referring to the natural or built environment.

Council's response

6.330 This has been clarified in the final version of the policy.

Recommendation in early draft SA Report

- Within Policy E6, additional wording could be incorporated to ensure that, where there are opportunities, heritage assets and their settings within and surrounding Primary Shopping Areas are protected and enhanced.

Council's response

The Councils considers this to be covered by the Heritage policies.

Recommendation in early draft SA Report

- Policy R7: Agriculture, Forestry and Horticulture could refer to supporting development for agricultural diversification, including supporting the continued viability of existing agricultural businesses.

Council's response

6.331 This has been addressed in the final version of the policy.

Recommendation in early draft SA Report

- Some clarity could be provided on what is meant by "local amenity" in Policy R8: Farm Diversification.

Council's response

6.332 This is explained in the supporting text.

Recommendation in early draft SA Report

- Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision could require proposals for open space, sports and recreation facilities to have no adverse impact on surrounding residential amenity, in relation to light and noise disturbance.

Council's response

6.333 The Council considers that this is addressed in the Pollution policy. It is also important to recognise that floodlights can be necessary for sports.

Recommendation in early draft SA Report

- Policy INF5 could also state that new facilities, particularly those relating to sport provision, should be of a size and scale which does not detract from the site's existing character.

Council's response

6.334 The Council considers that this is addressed in the Design policies.

Chapter 7

Cumulative effects

7.1 This chapter presents an assessment of the cumulative effects of the Regulation 18 Draft Local Plan on each of the SA objectives, as well as on geographical areas within Tonbridge and Malling Borough. Consideration is also given to the potential for cumulative effects with neighbouring authorities' Local Plans.

7.2 The cumulative effects of the Local Plan are summarised in **Table 7.1**. Unless otherwise stated, the effects are assumed to be long-term and permanent.

7.3 **Table 7.2** and at the end of this chapter presents the total effects of all of the policies in the Local Plan.

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

7.4 The overall scale of development proposed in the Local Plan is likely to benefit people's well-being in terms of providing enough homes to meet local needs. Further to this, the Local Plan focuses development at the larger settlements which tend to have better access to healthcare facilities and where opportunities to walk and cycle day to day are likely to be good. The Local Plan includes Plan Objectives 4 and 6, as well as various policies which will combine to improve the health and wellbeing of local people, both directly and indirectly. In particular, Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision supports the provision of open space, sport and recreation facilities, all of which have the potential to improve both people's physical health and mental well-being. The policy states that residential developments with six or more units must provide or contribute to the provision or improvement of sports, recreation and open space facilities, whilst Plan Objective 3 seeks to provide excellent and easily accessible social infrastructure and green spaces to support community health and wellbeing. This is reinforced through the community infrastructure policies, which support the provision and enhancement of community facilities, healthcare facilities and educational establishments. Policies in the Local Plan addressing the protection and enhancement of open spaces, including those policies in the green and blue infrastructure section of the Local Plan, will further benefit public health by ensuring access to high quality open spaces within the borough which can be used for outdoor activities.

7.5 Other policies will also address health and wellbeing, particularly those that seek to increase levels of walking and cycling – as well as increasing levels of physical

health through exercise, this will reduce car use and the associated pollutants which can be damaging to human health. This will also be achieved through Policy NE2: Air Quality which will help to minimise air pollution and the adverse effects it can have on people's health and Policy INF2: Sustainable Transport and Active Travel, which promotes active and sustainable transport infrastructure.

7.6 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 1.

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

7.7 The Local Plan vision focuses development in the new urban quarter of Tonbridge Town Centre, which will improve the range of services and facilities available in the borough. Indeed, development is generally proposed in higher tier settlements where more services and facilities are available, through Policies SP1: Spatial Strategy and SP3: Settlement Hierarchy and general development principles. This will help improve equality and access to community facilities and services. Moreover, the scale of development proposed by the Local Plan is likely to stimulate the development of further services and facilities.

7.8 While the population growth resulting from the residential development proposed in the Local Plan could put pressure on existing services and facilities, the Local Plan makes provision for the retention, enhancement, and delivery of new facilities, particularly community, indoor, and outdoor sports facilities, through Policies INF4: Community Facilities and INF5: Outdoor and Indoor sports, recreation and open space provision.

7.9 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 2.

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

7.10 The level of development proposed in the Local Plan could result in increased pressure on places at existing schools. However, it could also stimulate the provision of new schools. Indeed, the Local Plan specifies that sustainable communities will be

supported through the provision of appropriately cited infrastructure and facilities. This is reflected in Local Plan Policy INF1: Provision of Infrastructure and Services, which states that new education facilities should be provided in locations that relate well to both existing and new development. Further to this, Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future supports proposals that will contribute to addressing local skill shortages and support local employment, re-skilling and retraining. Policy E4: Employment and Skills requires large applications to be accompanied by an Employment and Skills Training Plan to demonstrate how the proposal will contribute to employing, educating and training local people.

7.11 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 3.

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

7.12 The Local Plan supports the delivery of employment land to meet local needs, which will create new job opportunities for existing and new residents. The amount of residential development proposed in the Local Plan will also support the growth of the Borough's economy by providing housing which will support people wishing to work in the Borough.

7.13 The Local Plan indicates an identified need for new employment areas of 361,500 sqm over the Plan period. Employment needs in the borough will be met existing commitment, and by allocating sufficient suitable sites across the borough which are attractive to developers and future occupiers, as articulated in Policy SP5: Employment Needs and through Policy A1: Housing and Employment Allocations, which allocates nine sites for employment development. The policies in the economy section of the Local Plan set out various ways in which the Council will seek to stimulate the borough's economy, supporting key business sectors, providing additional employment land and floorspace, and supporting an appropriate scale of growth and diversification of the rural economy. Policies E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future and E5: Supporting the Vitality of Town, Service and Local Centres will broadly have positive effects on SA Objective 4, as protecting and strengthening the vitality and vibrancy of the borough's towns and village centres will benefit the local economy.

7.14 Policies SP3: Settlement Hierarchy and General Development Principles and SP1: Spatial Strategy aim to boost economic growth by prioritising development in urban areas and town centres, which will stimulate growth, business expansion, and infrastructure investment. However, concentrating development in larger settlements may foster an inequitable distribution of opportunities across settlements.

7.15 There is also some potential tension between the policies in the Local Plan that seek to protect and enhance the built and natural environment, and the objective of supporting the local economy. For example, policies such as SP7: Green Belt and SP8: Managing Development in the Green Belt restrict employment development, with the exception of certain small-scale and specific circumstances, such as agriculture, re-use of existing rural buildings for business use, and additional housing (with more detail provided in Policy R6: Employment Development Outside Existing Settlement Confines). Policy NE11: Ground Contamination also sets out strict criteria for new development on contaminated land which could be seen as potentially restricting employment-related development, to the detriment of the local economy. However, overall, it is considered that such measures will serve to direct economic growth to the most appropriate locations with the borough, and it is recognised that protecting and enhancing the local environment will have indirect positive effects for the economy, by making the borough more attractive to visitors and investors.

7.16 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to SA Objective 4.

SA objective 5: To protect and enhance biodiversity and geodiversity

7.17 Tonbridge and Malling contains or is within close proximity of a number of designated and non-designated biodiversity and geodiversity assets. The overall scale of growth proposed through the Local Plan could result in adverse impacts on biodiversity, including habitat loss, fragmentation and disturbance, as well as the displacement of species as a result of construction and human activities once development is occupied. Although it is stipulated in Policy SP1: Spatial Strategy that development will follow a 'brownfield first' principle, some development would still be directed to greenfield sites and so have a greater potential for harm.

7.18 Various policies in the Local Plan, particularly those contained in the 'Natural Environment' chapter, specifically aim to conserve and enhance biodiversity. This is particularly important as a number of the site allocations are within close proximity of internationally or nationally designated biodiversity sites, geodiversity sites, or Ancient Woodland, or contain an existing green infrastructure asset. Policy NE4:

Designated Sites, Irreplaceable Habitat and Priority Habitats and Species prevents development which will have an adverse impact on priority habitats and species, other than in exceptional circumstances. Policy NE5: Biodiversity Net Gain also helps to address habitat loss and fragmentation by making Biodiversity Net Gain mandatory in most development. Taken together, these should limit the potential adverse impacts of new development provided for by the Local Plan.

7.19 The HRA Report for the Local Plan undertook Screening and Appropriate Assessment in relation to likely significant effects identified regarding recreational pressure, air quality and water quality, quantity, level and flow. It concludes that, with the recommendations made in the report in relation to mitigation of recreational pressure at North Downs Woodlands SAC implemented, the Local Plan will not have adverse effects on the integrity of any European sites.

7.20 Overall, the Local Plan is expected to have a cumulative mixed minor positive and minor negative (+/-) effect in relation to SA Objective 5. T

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

7.21 Tonbridge and Malling contains land that falls within two National Landscapes: Kent Downs to the north and High Weald to the south. While no strategic allocations are made in the National Landscapes, the large-scale development proposed in the Local Plan could have adverse effects on the general character and quality of the borough's landscapes and townscapes. However, it also offers opportunities to achieve enhancements through high quality and appropriately located new development which may benefit the townscape and landscape.

7.22 The Local Plan contains specific mitigation regarding the protection and enhancement of the borough's landscapes and townscapes. There are a number of policies relating to the Green Belt (Policy SP7: Green Belt and Policy SP8: Managing Development in the Green Belt), green gaps (Policy SP9: Local Green Gap) and the provision of green infrastructure (e.g. Policies NE6: Green and Blue Infrastructure and NE5: Biodiversity Net Gain). These policies will benefit the overall character and appearance of Tonbridge and Malling, and the setting of built development, while policies requiring high quality design (Policies D1: Achieving High Quality Design and D2: Design Codes and Masterplans) will also provide mitigation. Some of the sites proposed for allocation are located in rural areas outside of settlements, with a small few located in the National Landscapes. Given that approximately 27% of the Borough is located within the Kent Downs National Landscape to the north and High

Weald National Landscape in the south, policies in the Local Plan relating to the protection and conservation of the National Landscapes will be particularly important in mitigating the potential negative effects of new development on this objective. This includes policies such as NE2: National Landscapes and NE1: Conserving and Enhancing the Natural Environment.

7.23 Overall, the Local Plan is expected to have a cumulative minor negative (-) effect in relation to SA Objective 6.

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

7.24 The large-scale development proposed in the Local Plan could have negative effects on the historic environment, for example by impacting upon the setting of heritage assets. However, effects will depend to a large extent on the design and layout of development which is not yet known.

7.25 However, a number of Local Plan policies address the protection and enhancement of the historic environment and so should help to mitigate the potential negative effects of the overall scale of new development on cultural heritage. In particular, Policy HE1: The Historic Environment states that all designated heritage assets and their settings will be given the highest level of protection and should be conserved and enhanced in a manner appropriate to their significance. The policy sets out detailed criteria that will apply to new developments, with proposals being required to conserve and enhance the significance of designated and non-designated heritage assets and their settings. Other policies that address high quality design more specifically (Policies D1: Achieving High Quality Design and D2: Design Codes and Masterplans) should also provide mitigation for the potential impacts of new development on cultural heritage features in and around the borough.

7.26 Overall, the Local Plan is expected to have a cumulative mixed minor positive and minor negative (+/-) effect in relation to SA Objective 7.

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

7.27 The River Medway is the Borough's primary watercourse, which flows northwards through Tonbridge and into the neighbouring borough of Maidstone, and the Medway conurbation in Kent, before emptying into the Thames Estuary. The main tributaries to the River Medway flow to the north from Tonbridge and to the west

of Snodland in the north east of the borough. Land adjacent to the river and its tributaries is categorised as fluvial Flood Zones 2 and 3.

7.28 The overall scale of development proposed through the Local Plan could result in an increased risk of flooding, particularly if development is in areas of high fluvial or surface water flood risk. A number of the allocated sites have been identified as having potential significant negative effects on this objective due to their proximity to areas of flood risk. However, the Local Plan includes a number of policies which seek to ensure that new development does not increase the risk of flooding. These include Policies CC7: Managing Development within Flood Risk Areas and CC8: Sustainable Drainage Systems in particular. Measures outlined by Policy CC1: Strategic Climate Change, which seeks to mitigate and adapt to the effects of climate change, are also expected to contribute towards mitigating flood risk.

7.29 Overall, the Local Plan is expected to have a cumulative minor negative (-) effect in relation to SA Objective 8.

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

7.30 Tonbridge and Malling Borough Council's Local Plan prioritises the development of brownfield land over greenfield land, although some development will still come forwards on greenfield land in order to meet the Borough's housing target. Indeed, most of the sites proposed for allocation are located on greenfield land – some of which is classified as best and most versatile agricultural land. However, a number of policies in the 'Economy' chapter of the Local Plan, particularly Policies E5: Supporting the Vitality of Town, Service and Local Centres and E8: Sequential and Local Impact Tests will have positive effects on SA Objective 9 as they seek to direct development to town centre locations where brownfield land is more likely to be available and promote the efficient use of land in those areas. The overarching housing policies are also expected to have a positive effect on this objective, particularly Policy SP2: Delivering homes for our communities, which identifies that the housing requirement will come forward in the most sustainable settlements.

7.31 Overall, the Local Plan is expected to have a cumulative mixed minor positive and minor negative (+/-) effect in relation to SA Objective 9.

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

7.32 The effects of human activities on the climate are irreversible on the timescale of humans alive today, although every little bit of avoided future temperature increase results in less warming. The amount of development proposed in the Local Plan could increase the number of cars on the road, contributing further towards greenhouse gas emissions. Likewise, the number of new homes that will be built could also increase levels of carbon with adverse effects on climate change mitigation. However, there are regulations in place that seek to reduce emissions, namely the amended Building Regulations 2010 and Future Building Standard from 2026 that require CO₂ emissions from new build homes and other buildings, including offices and shops, to be 30% lower than current standards. Alongside this, the Local Plan includes some ambitious policies seeking to mitigate climate change, particularly in the 'Natural Environment' and 'Climate Change' chapters, but also within the Vision and seven Plan objectives. Policies such as CC1: Strategic Climate Change and CC4: Energy and Heating set out wide ranging measures which will combine to help achieve SA Objective 10. They collectively address key aspects of climate change mitigation, including reducing greenhouse gas emissions through reducing reliance on the private car, and incorporating renewable and low carbon energy technology and storage into new development. Policies D1: Achieving High Quality Design and CC3: Sustainable Design and Construction also require new development in Tonbridge and Malling to adhere to high standards of design and construction.

7.33 In terms of reducing emissions from transport sources, in conjunction with the shift to electric vehicles which may help reduce emissions associated with private vehicles, Local Plan Policy INF2: Sustainable Transport and Active Travel specifically aim to reduce car usage, providing measures to maximise and prioritise sustainable and active travel infrastructure such as the provision of access and bus service improvements. This will help reduce greenhouse gas emissions associated with use of the private car, particularly diesel and petrol cars.

7.34 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 10.

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

7.35 The effects of human activities on the climate are irreversible on the timescale of humans alive today, although anticipating the adverse effects of climate change and taking appropriate action to prevent or minimise the damage they can cause may minimise the severity of the impact of climate change on residents within Tonbridge and Malling. It is important to ensure that the large-scale development proposed in the Local Plan is resilient to the effects of climate change. In the Local Plan, climate change adaptation is addressed directly through Policy CC1: Strategic Climate Change, which stipulates that all new development will be expected to maximise the use of measures to adapt to the impacts of climate change, particularly in response to biodiversity, flooding, overheating and water scarcity where required and feasible.

7.36 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 11.

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

7.37 Tonbridge and Malling contains six Air Quality Management Areas (AQMAs) and the main pollutant of concern is NO₂. There have been some exceedances of the annual mean NO₂ air quality objective of 40µg/m³ at one of the six AQMAs: Watlington AQMA. The amount of development proposed in the Local Plan is likely to contribute towards air pollution due to the increase in cars on the road – particularly in the short-term and on a temporary basis as a result of an increase in construction traffic associated with new development. However, future baseline air pollution levels are likely to be reduced by increasing uptake of electric vehicles, driven by the Government's commitment to ban the sale of all new petrol and diesel cars by 2030 and gradual rollout of electric vehicle charging networks. Electric vehicles do, however, contribute to non-exhaust emissions through particulates from tyres.

7.38 Numerous policies in the Local Plan will help to mitigate the negative effects of the overall scale of growth proposed in the Local Plan, including in the short-term. In particular, Policy INF2: Sustainable Transport and Active Travel seek to limit air pollution through encouraging a modal shift and increasing levels of sustainable transport use. The location of most development in the larger settlements will also

mean that opportunities to make use of sustainable modes of transport day-to-day should be good.

7.39 Overall, the Local Plan is expected to have a cumulative minor positive (+) effect in relation to SA Objective 12.

SA objective 13: To protect material assets and minimise waste

7.40 All new development will inevitably involve an increase in mineral use and levels of pollution in the short-term and on a temporary basis; however, it is assumed that the impacts will be mitigated in the planning process and not significantly influenced by the location of new development. Policy D2: Design Codes and Masterplans states that design codes that deliver sustainable design must be prepared for large key sites of 500 dwellings or more. This will ensure the sustainable use of natural resources, protecting material assets. Additionally, Policies CC1: Strategic Climate Change and C2: Circular Economy support the reuse of existing buildings and materials and require that development proposals prioritise the reuse and retrofit of existing buildings wherever possible before considering the design of new buildings.

7.41 Overall, the Local Plan is expected to have a cumulative negligible (0) effect in relation to SA Objective 13.

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

7.42 The Local Plan provides for a minimum of 19,746 new homes within Tonbridge and Malling over the Plan period, which equates to 1,097 homes per year. Development will be focused in and around the Principal Service Centres, Service Centres, Primary and Secondary Villages. The policies within the 'Housing' chapter of the Local Plan will combine to ensure that new housing including that allocated in Policy A1: Housing and Employment Allocations is of high quality and includes a range of tenures, including housing to meet the needs of specific groups such as the elderly and students. Policy H2: Affordable Housing will provide 40% affordable homes on sites capable of delivering ten homes or more across most of the borough, and six or more homes in designated rural areas. The policy also commits the Council to ensuring that 50% of affordable housing contributions are allocated to social rental homes, 30% to affordable rental homes and 20% for intermediate accommodation. Policy H1: Housing to Address Needs sets out that the Council will

deliver a diverse supply of new homes in terms of type, size, and location, and Policy SP4: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs provides for sufficient suitable land to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople.

7.43 There is some potential tension between the policies in the Local Plan that seek to protect and enhance the built and natural environment, and the objective of supporting new housing development. However, these tensions are unlikely to be significant.

7.44 Overall, the Local Plan is expected to have a cumulative significant positive (++) effect in relation to SA Objective 14.

Table 7.1: Cumulative effects of the Regulation 18 Draft Local Plan

SA objective	Tonbridge and Malling Local Plan cumulative effect
SA1: Health and well-being	+
SA2: Services and facilities	+
SA3: Education	+
SA4: Economic growth	++
SA5: Biodiversity and geodiversity	+/-
SA6: Landscape and townscape	-
SA7: Historic environment	+/-
SA8: Water	-
SA9: Soils	+/-
SA10: Climate change mitigation	+
SA11: Climate change adaptation	+
SA12: Pollution	+

SA objective	Tonbridge and Malling Local Plan cumulative effect
SA13: Waste	0
SA14: Housing	++

Cumulative effects on geographical areas

7.45 Most of the growth proposed in the Tonbridge and Malling Local Plan is to be focused around Tonbridge, Aylesford, Borough Green, Snodland, Kings Hill and Hildenborough. Some of the allocations proposed for residential growth are in relatively close proximity to one another. Allocations at Aylesford, Snodland and Kings Hill could result in cumulative effects in the north east of the Borough. For example, there could be particular pressure on the road network and services and facilities in that area. Although the new housing and employment land to be delivered in these areas will contribute significantly towards growth and regeneration, it is also likely that the large scale of development could have adverse effects on the natural, built and historic environment. There could be some issues with service capacity, but the 'Infrastructure' policies should help address this.

7.46 There is significant growth proposed as single allocations at Borough Green, North Tonbridge and Snodland. Although new housing will be delivered to meet needs in those areas, there is potential for development of such a large scale to have adverse effects on the natural, built and historic environment. These developments may also increase the strain on existing services and facilities in the areas, although infrastructure delivery is supported by the Local Plan and should help mitigate any adverse effects on service availability.

7.47 There is some growth proposed adjacent to smaller settlements in the borough and so there is potential for some adverse effects on the natural environment, although the Local Plan provides different forms of mitigation to address this.

Potential for cumulative effects with neighbouring authorities' plans

Gravesham Borough

7.48 The Development Plan for Gravesham comprises the Local Plan Core Strategy and Local Plan Policies Map (2014), Local Plan First Review (1994) and the Kent Minerals and Waste Local Plan 2024-30 (2025). The Local Plan Core Strategy seeks to deliver 6,170 new dwellings in the period 2011 to 2028, much of which will be delivered in the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area, Gravesend Town Centre Opportunity Area and the Gravesend Riverside East and North East Gravesend Opportunity Area. Dwellings will also be delivered borough-wide and on known sites that have development potential. The Local Plan Core Strategy also seeks to deliver 186,490sqm employment floorspace – most of which would be at the Northfleet Embankment and Swanscombe Peninsula East Opportunity Area. Gravesham Borough Council is currently in the process of updating its evidence base to inform work on the new Local Plan.

7.49 Some development is allocated in the north of Gravesham Borough on the outskirts of Gravesend. However, given its location well away from the northern border of Tonbridge and Malling and the limited growth in the more rural south of the district, any effects between the two plans will be limited.

Medway

7.50 Medway Council's Local Plan (2003) will be replaced by the emerging Local Plan, which recently underwent Regulation 19 consultation. The emerging Local Plan seeks to meet the housing need of 24,540 dwellings and the employment floorspace need of 240,500sqm over the period 2026 to 2041. The development strategy for Medway prioritises regeneration and directs development to urban waterfront and centre opportunity areas. Chatham will be an important focus for much of the urban regeneration, with development proposed in the centre of Chatham and in areas adjacent to the centre, such as Chatham Intra and the station gateway. Outside of the urban regeneration areas, the Council will support the expansion of suburban neighbourhoods and villages.

7.51 A significant amount of residential growth is proposed for the Capstone Valley in the south west of Medway district, bordering Tonbridge and Malling to the north east. Policy SA7: Capstone Valley proposes up to 3,958 new homes, a primary school, a secondary school and a local centre. This could have effects on Tonbridge and

Malling, such as an increase in the number of cars in the area and associated air pollution and greenhouse gas emissions, in addition to disturbance to the natural and built environment. These effects may be particularly felt in the settlements of Aylesford and Snodland and could have an adverse cumulative impact with the allocations in that area. The development would also, however, provide housing, job opportunities, potential employees to support the growth of new employment and services and facilities (particularly education) that residents of Tonbridge and Malling could also benefit from.

Maidstone Borough

7.52 Maidstone Borough Council's Local Plan Review (2024) seeks to deliver 19,669 new dwellings in the period 2021 to 2038, in addition to 119,250sqm employment floorspace. The Maidstone Urban Area will be the focus for development, in addition to Lenham Heath and Lidsing which will comprise two new garden settlements. Development will also take place at Invicta Park Barracks and through the delivery of Woodcut Farm, which is a business park located at Junction 8 of the M20.

7.53 The residential development proposed in Maidstone Borough at Invicta Park Barracks is close to the eastern boundary of Tonbridge and Malling. Policy LPRS5(B) proposes approximately 1,300 dwellings at the site. In addition, there are numerous residential allocations in or adjacent to Maidstone town centre. These developments could have effects on Tonbridge and Malling, such as an increase in the number of cars in the area and associated air pollution and greenhouse gas emissions, in addition to disturbance to the natural and built environment. These effects may be particularly felt in the settlements of Ditton, Larkfield and West Malling and could have an adverse cumulative impact taking into account the allocations in those areas. The developments would also, however, provide housing, job opportunities, potential employees to support the growth of new employment and services and facilities that residents of Tonbridge and Malling could also benefit from.

Tunbridge Wells Borough

7.54 Tunbridge Wells Council recently consulted upon the Main Modifications to the new emerging Local Plan. In its new Local Plan, the Council seeks to deliver 12,204 dwellings over the period 2020 to 2038, in addition to 14ha of employment floorspace. Most of this development will be located in Paddock Wood, followed by Capel, the new garden settlement at Tudeley Village and Royal Tunbridge Wells. Further to this, a new business park will be delivered to the north of North Farm/Kingstanding Way in Royal Tunbridge Wells.

7.55 The residential development in Paddock Wood is in the north west of Tunbridge Wells Borough, close to the south-eastern boundary of Tonbridge and Malling. Policy STR/SS 1 allocates between approximately 3,490 and 3,590 dwellings on sites in and adjacent to Paddock Wood along with a two-form entry expansion of the local secondary school and two two-form entry primary schools. Further to the west but still close to the south-eastern border with Tonbridge and Malling Policy is Tudeley. Policy STR/SS 3 allocates approximately 2,800 dwellings for a new garden settlement at Tudeley along with a six-form entry secondary school, three-form entry primary school and employment land. These developments could have effects on Tonbridge and Malling, such as an increase in the number of cars in the area and associated air pollution and greenhouse gas emissions, in addition to disturbance to the natural and built environment. These effects may be particularly felt in Tonbridge and could have an adverse cumulative impact with the allocations in that part of the Borough. The development would also, however, provide housing, job opportunities, potential employees to support the growth of new employment and services and facilities (particularly education) that residents of Tonbridge and Malling could also benefit from.

Sevenoaks District

7.56 Sevenoaks District Council's Local Plan comprises the Core Strategy Development Plan (2011) and Allocations and Development Management Plan (2015). The Core Strategy seeks to deliver 2,300 dwellings in the period 2006 to 2026 – most of which will be located in the urban areas of Sevenoaks and Swanley. It also supports the delivery of employment floorspace at these two settlements. The Local Plan Review is due to be published for Regulation 18 Consultation in late-2025.

7.57 Most of the growth in the adopted Local Plan is focused around Sevenoaks, Edenbridge, Westerham and Swanley. Of these settlements, Sevenoaks is the closest to the border with Tonbridge and Malling. However, much of the proposed growth in the adopted Local Plan has been brought forward therefore any effects of future growth – in advance of that being considered through the Local Plan Review process – are likely to be limited on Tonbridge and Malling.

Table 7.2: Total effects of the Regulation 18 Draft Local Plan

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Vision	+	+	+	+	+	+	+	+	+	+	+	+	+	+
Objective 1	0	0	0	0	0	0	0	0	+	++	++	0	+	0
Objective 2	0	0	0	-?	++	++	++	0	0	0	0	0	0	-?
Objective 3	0	0	0	0	-?	-?	-?	-?	-?	0	0	0	0	++
Objective 4	++	+	0	0	-?	-?	-?	-?	-?	0	0	0	0	0
Objective 5	0	0	0	++	-?	-?	-?	-?	-?	0	0	0	0	0
Objective 6	0	++	0	+	-?	-?	-?	-?	-?	0	0	0	0	0
Objective 7	+	0	0	+	0	0	0	0	0	++	0	+	0	0
Policy SP1: Spatial Strategy	++	++	0	++	-	--/+	--?	--	--	+	-	+	0	+
Policy SP2: Delivering Homes for our Communities	0	0	0	0	-?	-?	-?	-?	-?	0	0	0	0	++
Policy SP3: Settlement Hierarchy and General Development Principles	+	++	0	0	+	+	0	0	0	+/-	0	+/-	0	++
Policy SP4: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs	0	0	0	0	-?	-?	-?	-?	-?	0	0	0	0	++
Policy SP5: Future Employment Growth	+	0	0	++	-?	-?	-?	-?	-?	0	0	0	0	0
Policy SP6: Town Centre Needs	0	+	0	++	0	0	0	0	0	0	0	0	0	0
Policy SP7: Green Belt	+	0	0	0	+	++	0	0	0	0	0	0	0	0
Policy SP8: Managing Development in the Green Belt	+	0	0	-	+	++	0	0	+	0	0	0	0	++/-
Policy SP9: Local Green Gap	+	0	0	0	+	++	0	0	0	0	0	0	0	0
Policy CC1: Strategic Climate Change	+	+	0	+	+	+	0	+	+	++	++	+	+	0
Policy CC2: Circular Economy	0	0	0	0	0	0	+	0	++	++	0	+	++	0

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy CC3: Sustainable Design and Construction	+	0	0	0	+	0	0	+	+	++	++	0	+	0
Policy CC4: Energy and Heating	+	0	0	0	0	0	0	+	0	++	0	+	0	0
Policy CC5: Renewable and Low Carbon and Heat Projects	+	0	0	0	+	+	+	+	+	++	0	+	0	0
Policy CC6: Water Efficiency	0	0	0	0	0	0	0	++	0	+	0	+	0	0
Policy CC7: Managing Development Within Flood Risk Areas	+	0	0	+	0	0	0	++	0	0	++	0	0	0
Policy CC8: Sustainable Drainage Systems (SUDS)	+	0	0	0	+	+	0	++	0	+	++	0	0	0
Policy NE1: Conserving and Enhancing the Natural Environment	+	0	0	0	++	++	0	+	++	+	+	+	0	0
Policy NE2: National Landscapes	0	0	0	0	+	++	+	0	0	0	0	+	0	0
Policy NE3: Landscape Character	0	0	0	0	+	++	+	+	0	0	0	0	0	0
Policy NE4: Designated Sites, Irreplaceable Habitat and Priority Habitat and Species	+	0	0	0	++/-	0	0	0	0	+	+/-	+	0	0
Policy NE5: Biodiversity Net Gain	0	0	0	0	++	0	0	+	0	+	+	+	0	0
Policy NE6: Green and Blue Infrastructure	+	0	0	0	++	+	+	+	+	+	+	+	0	0
Policy NE7: Woodland, Trees and Hedgerows	+	0	0	0	+	+	+	0	0	+	+	+	0	0
Policy NE8: Best and Most Versatile Agricultural Land	0	0	0	+	+	+	+	+	++	+	0	0	0	+
Policy NE9: Noise, Vibration and Odour	+	0	0	0	+	+	+	+	++	+	0	++	0	0
Policy NE10: Air Quality	+	0	0	0	+	+	+	0	0	0	0	++	0	0
Policy NE11: Ground Contamination	+	0	0	0	0	0	0	+	++	0	0	++	0	0
Policy NE12: Light Pollution	+	0	0	0	+	+	+	+	++	+	0	++	0	0
Policy HE1: The Historic Environment	0	0	0	0	0	+	++	0	0	0	0	0	0	0
Policy HE2: Listed Buildings	0	0	0	0	0	0	++	0	+	0	+	0	0	0
Policy HE3: Conservation Areas	+	0	0	0	+	+	++	0	0	+	0	0	0	0

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy HE4: Historic Parks and Gardens (designated and non-designated)	0	0	0	0	0	+	++	0	0	0	0	0	0	0
Policy HE5: Archaeology	0	0	0	0	0	0	++	0	0	0	0	0	0	0
Policy HE6: Enabling Development for Heritage Assets	0	0	0	0	0	+	++	0	0	0	0	0	0	0
Policy D1: Achieving High Quality Design	+	0	0	+	+	++	+	0	+	+	+	+	+	+/-
Policy D2: Design Codes and Masterplans	+	0	0	0	0	++	0	0	0	0	0	0	0	+
Policy H1: Housing to Address Needs	+	+	0	0	0	0	0	0	0	+	0	+	0	++
Policy H2: Affordable Housing	+	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy H3: Build to Rent	+	+	0	0	0	0	0	0	0	+	0	+	0	++
Policy H4: Gypsy, Traveller and Travelling Showpeople - Safeguarding Sites	0	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy H5: Gypsy, Traveller and Travelling Showpeople - Site Criteria	+	+	+	0	0	+	0	+	0	+	0	+	+	++
Policy H6: Specialist Housing to Meet the Needs of Older and Vulnerable People	++	+	0	0	0	0	0	0	0	+	0	+	0	++
Policy H7: Accessible and Adaptable Homes	++	0	0	0	0	0	0	0	0	0	0	0	0	++
Policy H8: Self and Custom-Build Housing	+	+	0	0	0	0	0	0	+	+	0	+	0	++
Policy H9: Houses in Multiple Occupation	+	0	0	0	0	+	0	0	0	0	0	0	+	+
Policy H10: Residential Extensions, Alterations, Annexes, and Ancillary Accommodation	+	0	0	0	0	+	+	0	0	0	0	0	0	+
Policy E1: Supporting a Prosperous, Inclusive and Sustainable Economic Future	+	+	+	++	0	0	0	0	0	+	+	+	0	0
Policy E2: Strategic Employment Areas	+	0	+	++	0	0	0	0	+	0	0	0	0	0
Policy E3: Other Employment Sites, Premises and Floorspace	+	0	0	++	0	0	0	0	0	0	0	0	0	0
Policy E4: Employment and Skills	0	0	++	++	0	0	0	0	0	0	0	0	0	0
Policy E5: Supporting the Vitality of Town, Service and Local Centres	+	++	0	++	+	+	+	0	0	+	0	+	0	+
Policy E6: Primary Shopping Areas	+	++	0	++	0	+	0	0	0	0	0	0	0	0

Policy	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
Policy E7: Above Ground Floorspace	0	+	0	++	0	+	+	0	+	0	0	0	+	+
Policy E8: Sequential and Local Impact Tests	+	++	0	++	0	0	0	0	0	+	0	0	0	0
Policy R1: Rural Exception Sites	+	0	0	0	0	+	0	0	0	0	0	0	0	++
Policy R2: Housing for Rural Workers	+	0	0	+	0	+	0	0	+/-	0	0	0	0	+
Policy R3: Replacement Dwellings Outside Settlement Confines	+	0	0	0	0	+	+	0	0	0	0	0	0	0
Policy R4: Conversion of an Existing Building to Residential Use Outside Settlement Confines	+	0	0	0	0	+	+	0	+	0	0	0	0	+
Policy R5: Residential Parks	+	+	0	0	0	+	0	0	0	0	0	0	+	+/-
Policy R6: Employment Development Outside Existing Settlement Confines	+	0	0	++	0	+	0	0	+	-	0	-	0	0
Policy R7: Agriculture, Forestry and Horticulture	+	0	0	+	0	+	0	0	+	-	0	-	0	0
Policy R8: Farm Diversification	0	0	0	++	0	+	0	0	+	0	0	0	0	0
Policy R9: Sustainable Tourism and Visitor Accommodation	+	+	0	++	+	+	+	0	+	+	0	+	0	+
Policy R10: Equestrian Facilities in the Countryside	+	0	0	+	0	+	0	0	+	0	0	+	+	0
Policy INF1: Provision of Infrastructure and Services	+	++	+	+	0	0	0	0	0	+	0	+	0	0
Policy INF2: Sustainable Transport and Active Travel	+	+	0	0	0	0	0	0	0	+	+	+	0	0
Policy INF3: Parking	+	+	0	0	0	0	0	0	0	+/-	0	+/-	0	0
Policy INF4: Community Facilities	++	++	0	+	0	+	0	0	+	0	0	0	0	0
Policy INF5: Outdoor and Indoor Sports, Recreation and Open Space Provision	++	++	0	0	+	0	0	+	0	+	+	+	0	0

Chapter 8

Monitoring

8.1 The SEA Regulations require that “the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”. Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.2 Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken. Given the relatively early stage of the Local Plan, indicators and targets for all SA objectives have been included. These indicators and targets were originally developed and included as part of the original SA Scoping Report for the new Local Plan that was produced in November 2021 and updated in January 2022 but have been reviewed and updated during the preparation of the November 2022 SA Report and this current SA Report.

8.3 The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already commenced and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up-to-date and reliable.

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

Sub-objectives

- To reduce health inequalities amongst different groups in the community.
- To improve access to health and social care services.

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

Indicators

1. Percentage of the resident population who consider themselves to be in good or very good health.
2. Life expectancy at birth for males and females.
3. Percentage of working-age population who have a long-term health problem or disability.
4. Police recorded crimes per 1,000 of the population.

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

Sub-objectives

- To improve access to leisure facilities.
- To maintain and improve access to essential services and facilities.
- To promote the use of more sustainable modes of transport.
- To encourage walking, cycling and the use of public transport.

- To provide, protect and enhance active travel routes, including Public Rights of Way networks.

Indicators

1. Average household size
2. Households assessed as homeless per 1,000 population.
3. Number of applications on the housing register.
4. House prices-earnings ratio.
5. Average broadband speed across the local authority area.
6. New permanent pitches/plots approved.
7. Number of C2 units (net) permitted.
8. Amount and type of new open space secured through S106.

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

Sub-objectives

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

Indicators

1. Percentage of residents aged 16 years and over with Level 4 or above qualifications.

2. Percentage of residents aged 16 years and over with no qualifications.

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

Sub-objectives

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

Indicators

1. Town Centre Vacancy Levels.
2. Prior notification- loss of office floorspace from prior notification.
3. Annual average unemployment rate.
4. Gains/losses in employment floorspace.
5. Applications for businesses operating from a residential property.
6. Number of new jobs created in the borough.

SA objective 5: To protect and enhance biodiversity and geodiversity

Sub-objectives

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

Indicators

1. Average percentage of BNG achieved.
2. Percentage of SSSIs in favourable condition.
3. Percentage of Local Wildlife Sites in positive conservation management.
4. Ancient woodland loss (ha).
5. Additional Tree Preservation Orders made.

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

Sub-objectives

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

Indicators

1. Number of new dwellings (net) permitted within the Kent Downs and High Weald National Landscapes.
2. Number of overturns against statutory advice.
3. Quantum of floorspace (net) permitted for employment uses within the Kent Downs and High Weald National Landscapes.
4. Average density of residential development.
5. Number of planning applications referred to a Design Review Panel.

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

Sub-objectives

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

Indicators

1. Number of heritage assets recorded as 'at risk' in the borough.
2. Number of new designated and non-designated heritage assets recorded.
3. Number of Conservation Area Appraisals reviewed/adopted.

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

Sub-objectives

- To protect water resources such as those used for the supply of water and abstraction.
- To reduce the risk of flooding to existing communities and ensure no new developments are at risk.
- To improve water quality including contributing towards achievement of relevant River Basin Management Plan aims.
- To minimise water consumption, such as through high standards of water efficiency.
- To ensure infrastructure is adequate to support water supply and sewer connections.
- To ensure that wastewater treatment infrastructure is available.

Indicators

1. Number of planning permissions granted contrary to Environment Agency and Lead Local Flood Authority (LLFA) advice on flooding grounds.
2. Per capita consumption of water in litres.
3. Percentage of river and groundwater units with biological and/or chemical quality rated as good.

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

Sub-objectives

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

Indicators

1. Percentage of housing development on greenfield/brownfield land.
2. Percentage of employment development on greenfield/brownfield land.
3. Number of dwellings recorded on the Brownfield Land Register.
4. Area (ha) of best and most versatile (Grades 1-3a) lost to development.

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

Sub-objectives

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

Indicators

1. Carbon dioxide emissions data per capita (tCO₂e).
2. Number of cars or vans in household.
3. Publicly available electric vehicle charging points.
4. Number of applications permitted for the generation of renewable or low carbon energy.

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

Sub-objectives

- To contribute to climate change adaptation.
- To ensure that developments are designed and constructed to assist in climate change adaptation i.e. reduce overheating, urban cooling, etc.
- To encourage best practice measures for managing flood risk such as SuDS or other flood alleviation measures.
- To reduce the risk of, and minimise flooding from all known sources, taking into account the impact of climate change.
- To avoid development in areas at risk of flooding or in adjacent areas that would increase flood risk.
- To ensure that nature-based solutions are maximised such as green walls, tree-planting, natural flood management solutions, etc.
- To ensure that there is suitable energy infrastructure capacity.

Indicators

1. Method of travel to work.
2. Percentage of new dwelling energy performance certificates at band C and above.
3. Percentage of all non-domestic energy performance certificates at band C and above.
4. Woodland as a percentage of area in the borough.

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

Sub-objectives

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

Indicators

1. Number of AQMA's in the Borough where NO₂ results exceed the National Air Quality objectives for which they were declared.
2. Publicly available electric vehicle charging points.

SA objective 13: To protect material assets and minimise waste

Sub-objectives

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

Indicators

1. Percentage of household waste sent for recycling and composting.

2. Number of fly tip incidents.
3. Allocations in the Local Plan that are located on minerals safeguarding sites.
4. Allocations in the Local Plan that are located on best and most versatile agricultural land (Grade 1-3a).

SA objective 14: To protect a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures

Sub-objectives

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

Indicators

1. New homes (net) completed.
2. New permanent pitches/plots approved.
3. New affordable homes (net) completed by tenure and type.
4. Percentage of new 1, 2, 3, 4+ bedroom dwellings (net) delivered.
5. Number of new applicants to the Self-Build Register and Custom Build Register.
6. Number of self-build and custom-build plots granted permission.

Chapter 9

Conclusions

9.1 The SA of the Regulation 18 Draft Local Plan for Tonbridge and Malling Borough has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the PPG. The SA objectives developed at the Scoping stage of the SA process (and refined since) have been used to undertake a detailed appraisal of the current consultation document.

9.2 The Regulation 18 Draft Local Plan provides a vision for the borough in 2042 together with supporting objectives, and a range of strategic and development management policies covering key topics. Strategic options are also presented for the plan area, as well as identifying reasonable alternative site options for residential, employment and mixed use development. Due to the overall scale of development proposed in the Local Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular those relating to biodiversity and geodiversity, landscape, cultural heritage, the water environment and soil resources. Some of these effects have the potential to be significant, depending on the extent to which they may be mitigated. However, the development proposed will meet the need for housing in the borough and will also stimulate the economic growth of Tonbridge and Malling Borough.

9.3 As the plan-making process progresses and the Draft Local Plan is refined for Regulation 19 consultation, the policies included within it and any additional options will continue to be subject to SA, with the findings feeding into the preparation of the plan.

Next steps

9.4 This SA Report will be available for consultation alongside the Regulation 18 Draft Local Plan between November 2025 and January 2026.

9.5 The consultation responses on the Regulation 18 Draft Local Plan and this SA Report will be taken into account in the next stages of the Local Plan preparation process.

LUC

November 2025

Appendix A

Consultation comments received in relation to the SA Scoping Report

Table A.1: Responses to representations received on the SA Scoping Report consulted upon between May and June 2025

Consultee	Comment	LUC's response
Historic England	Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Tonbridge and Malling Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets. Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/. This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.	Noted.
Natural England	Natural England welcomes the opportunity to engage with you authority at this scoping stage of the SA.	Noted.

Consultee	Comment	LUC's response
	Relevant plans and programmes Natural England has not reviewed in detail the plans, policies and programmes listed in Appendix A of the report, but we advise that the list of types of plans which relate to the natural environment appear to be largely comprehensive. In particular, we welcome the inclusion of Natural England's Green Infrastructure Framework (2023) and Kent and Medway Local Nature Recovery Strategy (LNRS).	
	Baseline Information The recently updated Kent Downs Landscape Character Assessment (2020) provides a useful guide to landscape characters areas of the Kent Downs National Landscape to aid the SA in this section, it further assesses changes and trends since the last iteration in 1995.	Relevant information from the Kent Downs Landscape Character Assessment has been added to the baseline information.
	We note that section 3.62 – 3.68 of the report details the current state of open space provision within the borough, acknowledging that there exists a greenspace deficit. Natural England's Green Infrastructure (GI) Standards, part of the GI Framework, provides clarity on the requirements for GI including accessible natural greenspace requirements. It would be useful to state how the Borough is meeting these standards within the report. This will be aided by the GI Map, also part of the GI Framework.	Reference to GI standards has been added to the report.
	Whilst we note that this chapter identifies the hierarchy of designated sites within the plan area, it does not reference the wider assets such as habitats and species of principal importance in England.	Text has been added to the baseline information on priority habitats within the borough. The site

Consultee	Comment	LUC's response
	Information pertaining to these assets should be available via the Kent and Medway Biological Records Centre and the evidence underpinning the Kent and Medway LNRS. Further to this, we advise that you consider the information in the attached Annex A for our advice on sources of local plan evidence on the natural environment.	assessment criteria have also been updated to include habitats from the Priority Habitat Inventory. The Kent and Medway LNRS will be added to the SA once it is complete.
	Key sustainability issues Overall, we welcome the overarching sustainability themes and issues identified within the report, as they cover most of the natural environment issues and areas within our remit. In particular, we welcome reference to the enhancement, extension and connection of natural assets and sites and the consideration of access to greenspace.	Noted.
	However, there are a further sustainability issues (constraints and/or objectives) within some themes that should be considered within the SA or given added clarity. We include comments on these further areas for consideration with the SA Framework below. <i>Climate</i> Natural England advise that this section could be strengthened by acknowledging the opportunity to use Nature-based Solutions (NbS) for climate adaptation that can deliver multifunctional benefits. Natural England's Climate Change Adaptation Manual is a particularly useful resource in this regard.	Text has been added to the 'Likely evolution of the issue without the Local Plan' section of the SA under 'Climate' on the opportunity to use nature-based solutions for climate adaptation.

Consultee	Comment	LUC's response
	<i>Landscape character</i> We welcome the inclusion of direct and indirect effects of development on protected landscapes within this section but advise that it could be strengthened by the addition of poor quality design as a key sustainability issue, as well as the scale of development. As is recognised, the Kent Downs National Landscape and the High Weald National Landscape are within the plan area, thus there is the potential for development to adversely affect their distinctive character and special qualities. We advise that good quality design plays an important role in mitigating such adverse effects to both landscape character and visual impacts.	Issues relating to poor quality design and the scale of development have been added to the 'Key sustainability issues' section of the SA under 'Landscape character'.
	<i>Ecology and biodiversity</i> Whilst we welcome acknowledgement of the potential impact of development on natural assets as a sustainability issue, development also offers the opportunity to support landscape scale nature recovery. We advise that the report acknowledges this opportunity as a key sustainability issue.	Text has been added to the 'Likely evolution of the issue without the Local Plan' section of the SA under 'Ecology and biodiversity' (now referred to as 'Ecology, biodiversity and geodiversity') on the opportunity that development presents to support landscape scale nature recovery.
	<i>Air quality</i> Whilst we welcome the inclusion of air quality as a key sustainability issue, it is not clear if the report acknowledges the importance of air quality for not only human health but also the health and biodiversity of our flora and fauna. We advise that this connection is made explicit in this section.	Text has been added to the 'Key sustainability issues' section of the SA under 'Air quality' and 'Ecology and biodiversity' (now referred to as 'Ecology, biodiversity and geodiversity') on the effects poor air quality can have on flora and fauna.

Consultee	Comment	LUC's response
	<i>Geodiversity</i> Whilst the report acknowledges geodiversity in the baseline information and subsequent SA Framework, it is absent from the key sustainability issues. We advise that the need to protect and enhance geodiversity should be considered a key sustainability issue.	The section 'Ecology and biodiversity' has been renamed 'Ecology, biodiversity and geodiversity', with text added on the importance of protecting and enhancing geodiversity.
	Sustainability Appraisal framework The following key issues should be given further consideration with the SA Framework: <i>SA objective 1: To improve human health and well-being</i> Natural England welcomes the commitment to equitable access to green space, and the connection this objective makes between human health, connection to nature, and green infrastructure (GI). However, we advise that this could be strengthened by committing to meeting Natural England's GI Standards. These standards define what good GI 'looks like' and aim to enable equitable provision of good GI.	The appraisal of the Local Plan options, policies and site allocations against the SA objectives contained within the SA framework will be guided in part by the appraisal questions (i.e. the sub-objectives) accompanying each SA objective. These questions are high-level and non-exhaustive and adding a sub-objective that commits Tonbridge and Malling Borough Council to meet Natural England's GI Standards would be too prescriptive. The extent to which the Local Plan requires new developments to meet Natural England's GI Standards is for the Council to consider.
	<i>SA objective 2: To improve equality and access to community facilities and services</i> Active Travel: Whilst we welcome the commitment "To encourage walking, cycling and the use of public transport", we advise that this could be strengthened by making an explicit commitment to the provision, protection and enhancement of active travel routes.	The following sub-objective has been added to the SA framework under SA objective 2: ■ To provide, protect and enhance active travel routes, including Public Rights of Way networks.

Consultee	Comment	LUC's response
	Public Rights of Way: The report identifies that the borough has strong Public Rights of Way (PRoW) networks, which are essential to enable active travel and access to nature. We therefore advise that could be strengthened by including the following sub-objective, and a related indicator: "To protect and enhance existing public rights of way networks"	
	<i>SA objective 5: To protect and enhance biodiversity and geodiversity</i> Local Nature Recovery Strategy: Whilst we welcome and support the sub-objective "To protect, enhance and expand ecological networks and their interconnectivity", we would like to see this objective have an explicit ambition to support the development and implementation of the Kent and Medway LNRS. As the report notes in section 2.24, the LNRS is key to delivering a strategic approach to maintaining and enhancing ecological networks.	The following sub-objective has been added to the SA framework under SA objective 5: ■ To support the development and implementation of the Kent and Medway Local Nature Recovery Strategy.
	Protected species: Whilst we welcome the commitment of the SA to "To protect, conserve and enhance priority species and habitats", it should be noted that not all protected species will be priority species. Thus, we advise this sub-objective is amended to consider all protected species.	The sub-objective has been amended as follows: ■ To protect, conserve and enhance <u>protected species, including</u> priority species, and habitats, <u>including</u> those of conservation importance that contribute to reversing the trend of ecological decline.
	<i>SA objective 6: To protect and enhance the borough's landscape and townscape character and quality</i>	Support noted.

Consultee	Comment	LUC's response
	Natural England welcome this objective and have no comments to make.	
	<i>SA objective 9: To conserve and enhance soil and mineral resources, use land efficiently and guard against land contamination</i> Open mosaic habitat: Whilst Natural England overall support the objective “To encourage development of brownfield land and the re-use of buildings, minimising greenfield development as far as possible”, it should be noted that some previously developed (brownfield) land can contain Open Mosaic Habitats on Previously Developed Land, a priority habitat which can be extremely diverse. We therefore advise that this sub-objective is amended, or a further sub-objective added, that acknowledges the ecological importance of these habitats.	Biodiversity is covered by SA objective 5: To protect and enhance biodiversity and geodiversity. One of the sub-objectives has been amended as follows: ■ To protect and enhance habitats and wildlife corridors, <u>including on brownfield land</u>.
	Best and Most Versatile (BMV) Agricultural Land: We welcome the commitment to protecting BMV land in this section.	Support noted.
	<i>SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation</i> Nature-based Solutions: We welcome the inclusion of a sub-objective that encourages the use of SuDS and other nature-based solutions for the purposes of climate change adaptation.	Support noted.
	<i>SA objective 12: To reduce levels of and exposure to noise, light and air pollution</i>	The SEA topics mentioned have been added.

Consultee	Comment	LUC's response
	Impacts to nature: As discussed above, excess noise, light and air pollution can not only impact human health, but biodiversity and the health of the natural environment. These factors are also key elements of the special qualities of the two protected landscapes. We therefore advise that 'Biodiversity', 'Flora and Fauna', and 'Landscape' are added to the SEA topics column.	
	Site assessment criteria <i>SA objective 1: To improve human health and well-being</i> Access to greenspace: Natural England note that this section does not include an indicator related to greenspace, connecting people with nature, or GI, despite the commitment in the SA Framework. Natural England's GI Standards (part of the GI Framework) encourage local authorities to adopt the following local Greenspace Close to Home Access targets: <i>EITHER a Doorstep OR Local Accessible Greenspace:</i> ■ A Doorstep Accessible Greenspace of at least 0.5ha within 200 metres (under 5 mins walk), ■ A Local Accessible Natural Greenspace of at least 2ha within 300 metres (5 mins walk from home) <i>AND a Neighbourhood Accessible Natural Greenspace:</i> ■ A medium sized Neighbourhood Accessible Natural Greenspace (10ha) within 1km (15 minutes' walk from home).	Access to open space is covered under SA objective 1. The distance thresholds used were developed by LUC, based on research undertaken by the Chartered Institution of Highways and Transportation.

Consultee	Comment	LUC's response
	<i>SA objective 5: To protect and enhance biodiversity and geodiversity</i> Natural England welcome the inclusion of an indicator to consider impacts on designated sites. However, we advise that it would be more appropriate to utilise the Impact Risk Zones for designated sites instead of a 250m buffer as a way of assessing whether impacts will be negative. These zones are site and features specific and indicate the types of development proposal which could potentially have adverse impacts.	Engagement with Natural England's National Planning Delivery Team in July 2024 has led to the conclusion that the SSSI IRZs dataset is not appropriate for use in SA. The dataset has been designed for use at the planning application stage and on a site-by-site basis, rather than for strategic-level assessment such as SA. In any case, recent updates to the dataset have rendered it unsuitable for use in GIS analysis as it no longer includes data attributes in the shapefiles (instead loading a webpage where relevant criteria are listed).
	<i>SA objective 6: To protect and enhance the borough's landscape and townscape character and quality</i> Natural England do not agree that a 500m buffer for negative impacts to protected landscapes is appropriate. Impact to National Landscapes, in particular the Kent Downs with distant views to and from the scarp slope as one of the special qualities, occur over significantly greater distances.	500m was considered a reasonable distance and has been used in other SAs for Local Plans elsewhere which have been found sound and adopted. This distance threshold has been used in other SAs for Local Plans elsewhere, which have been sound and adopted. However, in recognition of Natural England's comments, the criteria have been amended such that sites within 1km could have a significant negative effect. This is uncertain because effects cannot be determined with any certainty based on distance alone and effects will depend on factors such as visibility and viewpoints and the specific design and layout of new development. Therefore, while distances may vary depending on the characteristics of a protected

Appendix A Consultation comments received in relation to the SA Scoping Report

Consultee	Comment	LUC's response
		landscape, for the purposes of the SA a set distance has been used.
Environment Agency	The baseline ecological information in the report should also include priority habitats including rivers and streams, not just designated sites. This is because to achieve a net gain for biodiversity, there should be a wider consideration of where hot spots for biodiversity are.	Reference to priority habitats will be added to the baseline information. Consideration will be given to priority habitats in the site assessment work.
	The proximity to features of importance for biodiversity should be taken into consideration when forming Local plan policy and site allocations.	This comment relates more to the Local Plan than the SA.

Appendix B

Review of relevant plans, policies and programmes

International plans and programmes of most relevance for the Local Plan

B.1 Declaration on Climate, Relief, Recovery and Peace (COP28 Declaration) (2023) [See reference 14] – international commitment to address the complex challenges posed by climate change, particularly in the most vulnerable regions. Although non-binding and outside the formal UNFCCC negotiations, this declaration unites the concerns and proposed solutions of countries and institutions across humanitarian, development, climate, and peace sectors. It aims to urgently enhance climate resilience in vulnerable communities that are most affected by climate-related conflicts and crises.

B.2 Convention on Biological Diversity (2022) [See reference 15] – COP15 Kunming-Montreal adopted the “Kunming-Montreal Global Biodiversity Framework” (GBF), including four goals and 23 targets for achievement by 2030.

B.3 The Glasgow Pact (UN Framework Convention on Climate Change, 2021) – nations adopted the Glasgow Climate Pact [See reference 16]. The package of decisions consists of a range of agreed items, including strengthened efforts to build resilience to climate change, to curb greenhouse gas emissions and to provide the necessary finance for both. Nations reaffirmed their duty to fulfil the pledge of providing \$100 billion annually from developed to developing countries. And they collectively agreed to work to reduce the gap between existing emission reduction plans and what is required to reduce emissions. They also agreed to phase down unabated coal power and inefficient subsidies for fossil fuels.

B.4 United Nations Declaration on Forests and Land Use (COP26 Declaration) (2021) [See reference 17] – international commitment to halt and reverse forest loss and land degradation by 2030 while delivering sustainable development and promoting an inclusive rural transformation.

B.5 The 2030 Agenda for Sustainable Development (2015) [See reference 18] – adopted by all United Nations Member States, provides a shared blueprint for

peace and prosperity for people and the planet and includes 17 Sustainable Development Goals (SDGs), designed to achieve a better and more sustainable future for all.

B.6 The United Nations Paris Climate Change Agreement (2015) [\[See reference 19\]](#) – an international agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

B.7 The United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998) [\[See reference 20\]](#) – establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.8 The United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002) [\[See reference 21\]](#) – sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.9 The International Convention on Wetlands (Ramsar Convention) (1976) [\[See reference 22\]](#) – an international agreement with the aim of conserving and managing the use of wetlands and their resources.

B.10 The European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979) [\[See reference 23\]](#) – aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.11 The International Convention on Biological Diversity (1992) [\[See reference 24\]](#) – is an international commitment to biodiversity conservation through national strategies and action plans.

B.12 The European Habitats Directive (1992) [\[See reference 25\]](#) – together with the Birds Directive, sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.13 The European Birds Directive (2009) [\[See reference 26\]](#) – requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.14 The United Nations Declaration on Forests (New York Declaration) (2014) [\[See reference 27\]](#) – sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

B.15 The Valletta Treaty (1992) [\[See reference 28\]](#), formerly the European Convention on the Protection of the Archaeological Heritage (Revisited) – aims to protect the European archaeological heritage “as a source of European collective memory and as an instrument for historical and scientific study”.

B.16 The United Nations (UNESCO) World Heritage Convention (1972) [\[See reference 29\]](#) – promotes co-operation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations.

B.17 The European Convention for the Protection of the Architectural Heritage of Europe (1985) [\[See reference 30\]](#) – defines ‘architectural heritage’ and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.18 The European Landscape Convention (2002) [\[See reference 31\]](#) – promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

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

Climate change adaptation and mitigation

B.19 Clean Energy Industries Sector Plan (2025) [\[See reference 32\]](#) is the UK government’s strategic initiative, under the Modern Industrial Strategy, to position the nation as a global leader in frontier clean energy technologies by 2035. The Plan sets out an ambition to double investment across key clean

energy industries, such as wind (onshore, offshore, floating), nuclear fission, fusion, hydrogen, carbon capture, usage and storage (CCUS), greenhouse gas removals, and heat pumps, to over £30 billion per year, while continuing to support other vital technologies like solar, long-duration energy storage and bioenergy. It aims to catalyse private sector engagement by deploying targeted public investment, including more than £8.3 billion through Great British Energy and Great British Energy-Nuclear up to 2029 and a Clean Energy Supply Chain Fund, and by reducing barriers to investment, thereby providing industry certainty and encouraging deployment and innovation.

B.20 The Hydrogen Update to the Market (2025) [\[See reference 33\]](#) provides a detailed overview of the UK's hydrogen sector progress in the first half of 2025 and outlines forthcoming opportunities as part of the government's Clean Energy Superpower and Growth Missions. It reports substantial milestones, including the shortlist of 27 projects advancing to Hydrogen Allocation Round 2 (HAR 2), with HAR 3 and HAR 4 scheduled from 2026 and 2028 respectively; HAR 1 winners have begun construction, unlocking over 700 skilled jobs across industrial regions. Significant investment commitments include over £500 million allocated toward developing the first regional hydrogen transport and storage network, aiming for operation by 2031, supported by a forthcoming Hydrogen to Power Business Model in 2026. The report highlights plans to abolish Climate Change Levy charges on electricity used in hydrogen electrolysis, regulatory and sector development initiatives, including skills and infrastructure planning, and signals the intent to publish a comprehensive UK Hydrogen Strategy in autumn 2025.

B.21 The Onshore Wind Strategy (2025) [\[See reference 34\]](#) presents the country's first dedicated strategy to accelerate onshore wind deployment as a key component of its Clean Power 2030 mission. The strategy sets a target of deploying 27-29 GW of onshore wind capacity across Great Britain by 2030, significantly increasing from existing capacity of over 16 GW, and backed by over 40 actions to tackle barriers such as planning delays, aviation and defence conflicts, grid access, and community engagement. New measures include the creation of an Onshore Wind Council to oversee implementation, potential expansion of the Clean Industry Bonus to support UK-based supply chains, workforce and skills development initiatives, and a programme to repower ageing turbines while smoothing the consenting and survey process for new projects. The strategy also outlines mechanisms to ensure community benefit through up to £70 million annually (£5,000 per MW) in local investment, while projecting creation of up to 45,000 direct and indirect jobs by 2030. The overarching aim is to deliver affordable, home grown renewable energy, reduce

reliance on volatile gas markets, and bolster energy security through rapid onshore wind expansion

B.22 The Clean Power 2030 Action Plan (2024) [\[See reference 35\]](#) aims to secure a fully clean electricity system by 2030, enhancing energy security, reducing fossil fuel reliance, and cutting emissions. It focuses on expanding renewables, improving grid infrastructure, accelerating planning, and fostering investment through Great British Energy. Flexible energy solutions like battery storage and hydrogen aim to support stability, while regulatory reforms aim to lower consumer bills. With £40 billion in annual investment, the plan aims to drive economic growth, job creation, and long-term sustainability, as well as position the UK as a leader in renewable energy and advancing the net-zero transition.

B.23 The Policy Statement on Onshore Wind (2024) [\[See reference 36\]](#) outlines a commitment to double onshore wind energy capacity by 2030. To achieve this, the policy removes previous planning restrictions specific to onshore wind projects in England, placing them on equal footing with other energy developments within the National Planning Policy Framework (NPPF). This change aims to boost Britain's energy independence, reduce energy bills, support high-skilled jobs, and address the climate crisis. The government also plans to consult on incorporating large onshore wind proposals into the Nationally Significant Infrastructure Project regime to expedite their approval process.

B.24 The National Adaptation Programme and the Fourth Strategy for Climate Adaptation Reporting (2023) [\[See reference 37\]](#) sets out a series of actions for the following sectors over a 5-year period:

- Infrastructure - new commitments on resilience standards, investment in water quality and a new transport adaptation strategy
- Nature environment - Local Nature Recovery Strategies, incorporate climate change adaptation into the design of Environmental Land Management schemes and Nature Recovery Projects
- Health, communities and the built environment - investment in flood and coastal erosion schemes, Adverse Weather & Health Plan, update the National Planning Policy Framework to support both adaptation and mitigation efforts and provide local climate projections
- Business and industry - Green Finance Strategy 2023, new strategy on supply chains and imports and survey business readiness for climate impacts.

B.25 International impacts – the government will adapt and build resilience in vulnerable communities to climate related disasters and continue to drive international action and consensus in negotiations on climate adaptation

B.26 Met Office, State of the UK Climate (2024) [\[See reference 38\]](#) – the tenth in the annual series of reports that provide a summary of the UK weather and climate through the calendar year 2023, alongside the historical context for a number of essential climate variables. It provides an accessible, authoritative and up-to-date assessment of UK climate trends, variations and extremes based on the most up to date observational datasets of climate quality.

B.27 HM Government, The Carbon Budget Delivery Plan (2023) [\[See reference 39\]](#) – explains how the Government intends to meet its legally-binding climate goals, setting out a package of quantified and unquantified proposals and policies, and associated timescales and delivery risks this also includes:

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

B.28 Department for Energy Security and Net Zero, Powering up Britain (2023) [\[See reference 40\]](#) – sets out the department’s approach to energy security and net zero, and acts as an introduction to Powering Up Britain: Energy Security Plan, and Powering Up Britain: Net Zero Growth Plan.

B.29 HM Government, The Net Zero Growth Plan (2023) [\[See reference 41\]](#) – outlines the Government’s plans to reach net zero and unlock the financial benefits that this can bring.

B.30 Defra, The Environment Improvement Plan 2023 [\[See reference 42\]](#) for England is the first revision of the 25YEP – it builds on the 25YEP vision with a new plan setting out how they will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country.

B.31 HM Government, UK Climate Change Risk Assessment 2022 [\[See reference 43\]](#) – outlines the UK government and devolved administrations’ position on the key climate change risks and opportunities that the UK faces

today. The risk assessment considers sixty-one UK-wide climate risks and opportunities cutting across multiple sectors of the economy and prioritises the following eight risk areas for action in the next two years:

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

B.32 Department for Energy Security and Net Zero, Prime Minister's Office, 10 Downing Street, and Department for Business, The British Energy Security Strategy (2022) [\[See reference 44\]](#) – sets out how the UK will enhance its energy security, setting out plans for future deployment of wind, new nuclear, solar and hydrogen, and for supporting the production of domestic oil and gas in the nearer term. The strategy builds on the Prime Minister's 'Ten point plan for a green industrial revolution', and the 'Net zero strategy'. Key aims and commitments include:

- New commitments to supercharge clean energy and accelerate deployment, which could see 95% of Great Britain's electricity set to be low carbon by 2030.
- Supporting over 40,000 more jobs in clean industries, totalling 480,000 jobs by 2030.
- Accelerated expansion of nuclear, wind, solar, hydrogen, oil and gas, including delivering the equivalent to one nuclear reactor a year instead of one a decade.
- Offshore wind – Aim of providing up to 50GW by 2030, of which 5GW is planned to be from floating offshore wind in deeper seas. This is aimed to be underpinned by new planning reforms to cut the approval times for new

offshore wind farms from 4 years to 1 year and an overall streamlining which will aim to reduce the time it takes for new projects to reach construction stages while improving the environment.

- Oil and gas – A licensing round for new North Sea oil and gas projects was launched, with a new taskforce providing bespoke support to new developments.
- Onshore wind – The Government plans to consult on developing partnerships with a limited number of supportive communities who wish to host new onshore wind infrastructure in return for guaranteed lower energy bills.
- Heat pump manufacturing – The Government aimed to run a Heat Pump Investment Accelerator Competition worth up to £30 million to make British heat pumps, with hopes to reduce demand for gas.

B.33 HM Government, The Environment Act 2021 [\[See reference 45\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. The Environment Act will deliver:

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

B.34 HM Government, The Net Zero Strategy: Build Back Greener (2021) [\[See reference 46\]](#) – sets out policies and proposals for decarbonising all sectors of the UK economy to meet net zero targets by 2050. It sets out strategies to keep the UK on track with carbon budgets, outlines the National Determined Contribution (NDC) and sets out the vision for a decarbonised economy in 2050. Its focus includes:

- Policies and proposals for reducing emissions across the economy in key sectors (power, fuel supply and hydrogen, industry, heat and buildings, transport, natural gas and waste).

- Policies and proposals for supporting transition across the economy through innovation, green investment, green jobs, embedding net-zero in government, local climate action, empowering people and businesses, and international leadership and collaboration.

B.35 Department for Energy Security and Net Zero and Department for Business, Energy & Industrial Strategy, The Industrial Decarbonisation Strategy (2021) [See reference 47] – aims to support existing industry to decarbonise and encourage the growth of new, low carbon industries to protect and create skilled jobs and businesses in the UK encouraging long-term investment in home-grown decarbonisation technology. The strategy builds in the Prime Minister’s 10 Point Plan for a Green Industrial Revolution and sets out the government’s vision for building a competitive, greener future for the manufacturing and construction sector and is part of the government’s path to net zero by 2050. The strategy aims to reduce emissions by two-thirds in just 15 years and support up to 80,000 jobs over the next thirty years and includes measures to produce 20 terawatt hours of the UK industry’s energy supply from low carbon alternatives by 2030. It also aims to introduce new rules on measuring the energy and carbon performance of the UK’s largest commercial and industrial buildings, providing potential savings to businesses of around £2 billion per year in energy costs in 2030 and aiming to reduce annual carbon emissions by over 2 million tonnes – approximately 10% of their current emissions. Other key commitments within the Strategy include:

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

B.36 Department for Business, Energy & Industrial Strategy, The Heat and Buildings Strategy (2021) [\[See reference 48\]](#) – sets out the Government’s plan to significantly cut carbon emissions from the UK’s 30 million homes and workplaces. This strategy aims to provide a clear direction of travel for the 2020s, set out the strategic decisions that need to be taken this decade, and demonstrate how the UK plans to meet its carbon targets and remain on track for net zero by 2050. Key aims of the strategy include:

- Reduce direct emissions from public sector buildings by 75% against a 2017 baseline by the end of carbon budget 6.
- Significantly reduce energy consumption of commercial, and industrial buildings by 2030.
- Phase out the installation of new natural gas boilers beyond 2035.
- Significantly grow the supply chain for heat pumps to 2028: from installing around 35,000 hydronic heat pumps a year to a minimum market capacity of 600,000 per year by 2028.
- Reduce the costs of installing a heat pump by at least 25-50% by 2025 and to ensure heat pumps are no more expensive to buy and run than gas boilers by 2030.
- Achieve 30-fold increase in heat pumps manufactured and sold within the UK by the end of the decade.
- Grow the market for heat pumps notably via a £450 million Boiler Upgrade Scheme to support households who want to switch with £5,000 grants.
- Improve heat pump appeal by continuing to invest in research and innovation, with the £60 million Net Zero Innovation Portfolio ‘Heat Pump Ready’ Programme supporting the development of innovation across the sector.
- Ensure all new buildings in England are ready for Net Zero from 2025. To enable this, new standards will be introduced through legislation to ensure new homes and buildings will be fitted with low-carbon heating and high levels of energy efficiency.
- Establish large-scale trials of hydrogen for heating, including a neighbourhood trial by 2023.
- Ensure as many fuel poor homes in England, as reasonably practicable, achieve a minimum energy efficiency rating of band C by the end of 2030.

- Support social housing, low income and fuel poor households via boosting funding for the Social Housing Decarbonisation Fund and Home Upgrade Grant, which aim to improve the energy performance of low income households' homes, support low carbon heat installations and build the green retrofitting sector to benefit all homeowners.
- Scale up low-carbon heat network deployment and to enable local areas to deploy heat network zoning – Heat Network Transformation Programme of £338 million (over 2022/23 to 2024/25).

B.37 Department for Energy Security and Net Zero, The UK Hydrogen Strategy (2021) [See reference 49] – sets out the approach to developing a substantial low carbon hydrogen sector in the UK and to meet the ambition for 5GW of low carbon hydrogen production capacity by 2030. The Strategy outlines the role of hydrogen in meeting net zero targets, the existing opportunity within the UK, a strategic framework, a roadmap for the economy, and the UK Government's commitments for a hydrogen economy. The Energy Performance of Buildings Regulations (2021).

B.38 HM Government, The Energy Performance of Buildings Regulations (2021) [See reference 50] – seek to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

B.39 Defra, The Waste Management Plan for England (2021) [See reference 51] – sets out the measures for England to work towards a zero waste economy.

B.40 Department for Business, Energy & Industrial Strategy, The Energy White Paper: Powering our net zero future (2020) [See reference 52] – builds on the Prime Minister's Ten Point Plan for a green industrial revolution. The white paper addresses the transformation of the UK's energy system, promoting high-skilled jobs and clean, resilient economic growth during its transition to net-zero emissions by 2050. Key aims of the paper include:

- Supporting green jobs – The government aims to support up to 220,000 jobs in the next 10 years.
- Transforming the energy system – To transform its electricity grid for net-zero, the white paper highlights how this will involve changing the way the

country heats its homes, how people travel, doubling the electricity use, and harnessing renewable energy supplies.

- Keeping bills affordable – The government aims to do this by making the energy retail market “truly competitive”. This will include offering people a method of switching to a cheaper energy tariff and testing automatically switching consumers to fairer deals to tackle “loyalty penalties”.
- Generating emission-free electricity by 2050 – The government aims to have “overwhelmingly decarbonised power” in the 2030s in order to generate emission-free electricity by 2050.
- Establishing UK Emissions Trading Scheme – The government aims to establish a UK Emissions Trading Scheme (UK ETS) from 1 January 2021 to replace the current EU ETS at the end of the Brexit Transition Period.
- Exploring new nuclear financing options – The government is continuing to explore a range of financing options for new nuclear with developers including the Regulated Asset Base (RAB) funding model.
- Further commitments to offshore wind – The white paper lays out plans to scale up its offshore wind fleet to 40 gigawatts (GW) by 2030, including 1GW of floating wind, enough to power every home in the country.
- Carbon capture and storage investments – Including £1bn worth of investments in state-of-the-art CCS in four industrial clusters by 2030. With four low-carbon clusters set up by 2030, and at least one fully net-zero cluster by 2040.
- Kick-starting the hydrogen economy – The government plans to work with industry to aim for 5GW of production by 2030, backed up by a new £240m net-zero Hydrogen Fund for low-carbon hydrogen production.
- Investing in electric vehicle charge points – The government plans to invest £1.3bn to accelerate the rollout of charge points for electric vehicles as well as up to £1bn to support the electrification of cars.
- Supporting the lowest paid with their bills – The government aims to support those with lower incomes through a £6.7bn package of measures that could save families in old inefficient homes up to £400.
- Moving away from fossil fuel boilers – The government aims, by the mid-2030s, for all newly installed heating systems to be low-carbon or to be appliances that it is confident can be converted to a clean fuel supply.
- Supporting North Sea oil and gas transition – The white paper notes the importance of supporting the North Sea oil and gas transition for the

people and communities most affected by the move away from fossil fuels. The government aims to achieve this by ensuring that the expertise of the oil and gas sector be drawn on in developing CCS and hydrogen production to provide new green jobs for the future.

B.41 HM Treasury, National Infrastructure Strategy: Fairer, faster greener (2020) [\[See reference 53\]](#) – sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050. This will be enabled by clear support for private investment and through a comprehensive set of reforms to the way infrastructure is delivered.

B.42 Climate Change Committee, The Sixth Carbon Budget report (2020) [\[See reference 54\]](#) – based on an extensive programme of analysis, consultation and consideration by the Committee and its staff, the report builds on the evidence published last year for their Net Zero advice. Their recommended pathway requires a 78% reduction in UK territorial emissions between 1990 and 2035. In effect, bringing forward the UK's previous 80% target by nearly 15 years.

B.43 Department for Transport, Decarbonising Transport: Setting the Challenge (2020) [\[See reference 55\]](#) – sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.44 HM Government, Flood and Coastal Erosion Risk Management: Policy Statement (2020) [\[See reference 56\]](#) – sets out the Government's long-term ambition to create a nation more resilient to future flood and coastal erosion risk, and in doing so, reduce the risk of harm to people, the environment and the economy. The Policy Statement sets out five policy areas which will drive this ambition. These are:

- Upgrading and expanding our national flood defences and infrastructure;
- Managing the flow of water more effectively;

- Harnessing the power of nature to reduce flood and coastal erosion risk and achieve multiple benefits;
- Better preparing our communities; and
- Enabling more resilient places through a catchment-based approach.

B.45 HM Government, The Waste (Circular Economy) (Amendment) Regulations (2020) [See reference 57] – seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

B.46 Climate Change Committee, Net Zero – The UK’s contribution to stopping global warming (2019) [See reference 58] – responds to a request from the Governments of the UK, Wales and Scotland, asking the Committee to reassess the UK’s long-term emissions targets. Our new emissions scenarios draw on ten new research projects, three expert advisory groups, and reviews of the work of the IPCC and others. The report’s key findings are that:

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

B.47 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018) [See reference 59] – sets out visions for the following sectors:

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

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

B.48 Our Waste, Our Resources: A strategy for England (2018) [\[See reference 60\]](#) – aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.49 HM Government, The Clean Growth Strategy (2017) [\[See reference 61\]](#) – sets out the approach of the Government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

B.50 Department for Communities and Local Government, The National Planning Policy for Waste (NPPW) (2014) [\[See reference 62\]](#) – identifies key planning objectives, requiring planning Authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy;
- Ensure waste management is considered alongside other spatial planning concerns;
- Provide a framework in which communities take more responsibility for their own waste;

- Help secure the recovery or disposal of waste without endangering human health and without harming the environment; and
- Ensure the design and layout of new development supports sustainable waste management.

B.51 Department of Energy & Climate Change, The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK 2012 [\[See reference 63\]](#) – aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.52 HM Government, The Promotion of the Use of Energy from Renewables Sources Regulations 2011 [\[See reference 64\]](#) – required the Government to ensure that renewable energy comprised 15% of the UK's total energy mix by 2020. The Renewable Energy Directive has now been superseded by Directive (EU) 2018/2001 (RED II). Although the UK has now been released from the renewable energy targets under RED II following Brexit, the UK-EU Trade and Cooperation Agreement includes a commitment to promote energy efficiency and the use of energy from renewable sources and reaffirmation of the EU's 2030 “targets” and the UK's 2030 “ambitions” for renewable energy and energy efficiency.

B.53 HM Government, The National Flood and Coastal Erosion Risk Management Strategy for England 2011 [\[See reference 65\]](#) – sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

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

B.54 HM Government, The Flood and Water Management Act 2010 [\[See reference 66\]](#) and The Flood and Water Regulations 2019 [\[See reference 67\]](#) – sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce

the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.55 HM Government, The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) [\[See reference 68\]](#) – sets out a five-point plan to tackle climate change. The points are as follows: protecting the public from immediate risk, preparing for the future, limiting the severity of future climate change through a new international climate agreement, building a low carbon UK and supporting individuals, communities and businesses to play their part.

B.56 HM Government, The UK Renewable Energy Strategy (2009) [\[See reference 69\]](#) – sets out the ways in which we will tackle climate change by reducing our CO2 emissions through the generation of a renewable electricity, heat and transport technologies.

B.57 HM Government, The Climate Change Act 2008 [\[See reference 70\]](#) – sets targets for UK greenhouse gas emission reductions of at least 100% by 2050, against a 1990 baseline (this was previously 80% but was updated to a net zero target in June 2019).

B.58 HM Government, The Planning and Energy Act (2008) [\[See reference 71\]](#) – enables local planning authorities to set requirements for carbon reduction and renewable energy provision. It should be noted that while the Housing Standards Review proposed to repeal some of these provisions, at the time of writing there have been no amendments to the Planning and Energy Act.

Health and well-being

B.59 Planning Policy for Traveller Sites (2024) [\[See reference 72\]](#) outlines objectives to ensure fair treatment of Gypsies, Travellers and Travelling Showpeople while respecting the interests of the settled community. Local planning authorities are encouraged to assess and address the need for Gypsy, Traveller and Travelling Showperson sites collaboratively, developing fair strategies and identifying appropriate land. The policy emphasises protecting the Green Belt from inappropriate development, promoting private site provision, and reducing unauthorised developments through effective planning and enforcement. This policy should be read alongside the National Planning Policy Framework to guide local authorities in plan-making and decision-taking regarding Gypsy, Traveller and Travelling Showperson sites.

B.60 The Policy Statement on New Towns (2024) [\[See reference 73\]](#) outlines a strategic vision to stimulate economic growth and enhance living standards by constructing 1.5 million new homes during the current parliamentary term. Central to this initiative is the development of large-scale communities, each comprising at least 10,000 homes, through both standalone new towns on greenfield sites and significant urban extensions or regeneration projects. These developments aim to address housing demand, alleviate constraints in existing urban areas, and align with national infrastructure plans. To ensure these new towns are well-connected, sustainable, and desirable places to live, the government has introduced a 'New Towns Code' mandating high standards of design and infrastructure, with a target of 40% affordable housing, focusing on social rented homes. An independent New Towns Taskforce, chaired by Sir Michael Lyons, has been established to advise on suitable locations for these developments, with a final shortlist expected within 12 months.

B.61 The Department for Levelling Up, Housing and Communities, Levelling Up and Regeneration Act (2023) [\[See reference 74\]](#) – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of SEA, HRA and EIA will eventually be replaced by a simpler process known as 'Environmental Outcomes Reports'.

B.62 Natural England, The Green Infrastructure Framework (2023) [\[See reference 75\]](#) – the framework will help increase the amount of green cover to 40% in urban residential areas. The Green Infrastructure Framework provides a structure to analyse where greenspace in urban environments is needed most. It aims to support equitable access to greenspace across the country, with an overarching target for everyone being able to reach good quality greenspace in their local area. From parks to green roofs, and increased tree cover, the Green Infrastructure Framework will make a significant contribution to nature recovery by embedding nature into new developments. Increasing the extent and connectivity of nature-rich habitats will also help increase wildlife populations, build resilience to the impacts of climate change, and ensure our cities are habitable for the future

B.63 Department for Levelling Up, Housing and Communities and Homes Office Anti-Social Behaviour Action Plan (2023) [\[See reference 76\]](#) – sets out a comprehensive strategy to combat anti-social behaviour (ASB) and restore public confidence in community safety. The plan emphasises a zero-tolerance

approach and introduces several key measures, including increasing the use of hotspot policing and enforcement, and changing laws and systems to take a zero-tolerance approach to anti-social behaviour.

B.64 Homes England, The Homes England Strategic Plan 2023 to 2028 (2023) [\[See reference 77\]](#) – sets out a vision to drive regeneration and housing delivery, to ensure that more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.65 Department for Levelling Up, Housing and Communities, The White Paper Levelling Up the United Kingdom (2022) [\[See reference 78\]](#) – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to population, health and well-being state that by 2030:

- The gap in Healthy Life Expectancy (HLE) between local areas where it is highest and lowest will have narrowed, and by 2035 HLE will rise by five years.
- Well-being will have improved in every area of the UK, with the gap between top performing and other areas closing.
- Homicide, serious violence, and neighbourhood crime will have fallen, focused on the worst-affected areas.
- Pride in place, such as people's satisfaction with their town centre and engagement in local culture and community, will have risen in every area of the UK, with the gap between the top performing and other areas closing.
- The number of primary school children achieving the expected standard in reading, writing and maths will have significantly increased. In England, this will mean 90% of children will achieve the expected standard, and the percentage of children meeting the expected standard in the worst performing areas will have increased by over a third.
- Renters will have a secure path to ownership with the number of first-time buyers increasing in all areas; and the Government's ambition is for the number of non-decent rented homes to have fallen by 50%, with the biggest improvements in the lowest performing areas.

B.66 Department for Levelling Up, Housing and Communities, A fairer private rented sector White Paper (2022) [\[See reference 79\]](#) – aims to build upon the vision of the Levelling Up White Paper and reform the Private Rented Sector and improve housing quality. It outlines that everyone deserves a secure and

decent home and outlines measures to improve the experience of renters in the Private Rented Sector.

B.67 The National Design Guide (2021) [\[See reference 80\]](#) – sets out the Government’s priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. Environment Agency, The State of the Environment: Health, People and the Environment (2021) [\[See reference 81\]](#) focuses on the relationship between human health and people’s access to and connection with a clean, high quality natural environment. It presents information on England’s environment, and people’s exposure to environmental pollutants, flooding and climate change in relation to human health. It highlights environmental inequalities that contribute to differences in health outcomes for people in England.

B.68 HM Government, Build Back Better: Our Plan for Health and Social Care (2021) [\[See reference 82\]](#) – sets out the Government’s new plan for health and social care. It provides an overview of how this plan will tackle the elective backlog in the NHS and put the NHS on a sustainable footing. It sets out details of the plan for adult social care in England, including a cap on social care costs and how financial assistance will work for those without substantial assets. It covers wider support that the government will provide for the social care system, and how the government will improve the integration of health and social care. It explains the government’s plan to introduce a new Health and Social Care Levy.

B.69 HM Government, The COVID-19 Mental Health and Wellbeing Recovery Action Plan (2021) [\[See reference 83\]](#) – sets out the Government’s plan to prevent, mitigate and respond to the mental health impacts of the pandemic during 2021 and 2022. Its main objectives are to support the general population to take action and look after their own mental well-being; to take action to address factors which play a crucial role in shaping mental health and well-being outcomes; and, to support services to meet the need for specialist support.

B.70 Ministry of Housing, Communities & Local Government, The Charter for Social Housing Residents: Social Housing White Paper (2020) [\[See reference 84\]](#) – sets out the Government’s actions to ensure residents in social housing are safe, listened to, live in good quality homes and have access to redress when things go wrong.

B.71 Public Health England, Using the planning system to promote healthy weight environments (2020), Addendum (2021) [\[See reference 85\]](#) – provides

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

B.72 Public Health England, PHE Strategy 2020-25 (2019) [\[See reference 86\]](#) – identifies PHE’s priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

B.73 Homes England, The Homes England Strategic Plan 2018 to 2023 [\[See reference 87\]](#) – sets out a vision to ensure more homes are built in areas of greatest need, to improve affordability, and make a more resilient and diverse housing market.

B.74 Ministry of Housing, Communities & Local Government, The Housing White Paper 2017 (Fixing our broken housing market) [\[See reference 88\]](#) – sets out ways to address the shortfall in affordable homes and boost housing supply. The White Paper focuses on the following:

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

B.75 Ministry of Housing, Communities and Local Government, The Planning Policy for Traveller Sites 2015 [\[See reference 89\]](#) – sets out the Government’s planning policy for traveller sites, replacing the older version published in March

2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.76 Department for Communities and Local Government, The Technical Housing Standards – Nationally Described Space Standard (2015) [\[See reference 90\]](#) – sets out the Government's new nationally described space standard. The standard deals with internal space within new dwellings and sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy, as well as floor areas and dimensions for key parts of the home.

B.77 UK Parliament, The Select Committee on Public Service and Demographic Change Report Ready for Ageing? (2013) [\[See reference 91\]](#) – warns that society is underprepared for the ageing population. The report states “longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises”. The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.78 Institute of Health Equity, Fair Society, Healthy Lives (2011) [\[See reference 92\]](#) – investigates health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

B.79 HM Government, Laying the foundations: A housing strategy for England [\[See reference 93\]](#) – aims to provide support to deliver new homes and improve social mobility.

B.80 HM Government, Healthy Lives, Healthy People: Our strategy for public health in England 2010 [\[See reference 94\]](#) – sets out how the Government's approach to public health challenges will:

- Protect the population from health threats – led by central Government, with a strong system to the frontline;
- Empower local leadership and encourage wide responsibility across society to improve everyone's health and well-being and tackle the wider factors that influence it;

- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework;
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier; and
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.81 HM Government, The Environmental Noise Regulations 2006 [\[See reference 95\]](#) – the Regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

Environment (biodiversity/geodiversity, landscape and soils)

B.82 The Climate and Nature Bill (2024) [\[See reference 96\]](#) is a proposed piece of legislation aimed at addressing the climate and ecological crises by setting legally binding targets to limit global heating and restore nature. It seeks to ensure that the UK does its fair share in reducing greenhouse gas emissions in line with the most up-to-date science, aiming to keep global temperature rises below 1.5°C. The bill also emphasises protecting and restoring biodiversity, requiring the government to develop and implement a strategy for nature recovery. A key aspect is the inclusion of a citizens' assembly to guide decision-making, ensuring public involvement in shaping climate and nature policies. The bill proposes stricter accountability measures, obliging the government to take action beyond existing net-zero commitments and biodiversity targets. It has gained support from environmental groups, scientists, and some MPs, though it has not yet been passed into law.

B.83 Defra, The Environment Improvement Plan 2023 [\[See reference 97\]](#) for England is the first revision of the 25YEP – it builds on the 25YEP vision with a new plan setting out how we will work with landowners, communities and businesses to deliver each of our goals for improving the environment, matched with interim targets to measure progress. Taking these actions will help us restore nature, reduce environmental pollution, and increase the prosperity of our country. To achieve its vision, the 25YEP set out 10 goals. We have used those 10 goals set out in the 25YEP as the basis for this document: setting out the progress made against all 10, the specific targets and commitments made in relation to each goal, and our plan to continue to deliver these targets and the overarching goals. The environmental goals are:

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

B.84 Defra, The waste prevention programme for England: Maximising Resources, Minimising Waste (2023) [\[See reference 98\]](#) – sets out government’s priorities for managing resources and waste, in line with the resources and waste strategy for England.

B.85 Defra, 25 Year Environment Plan: progress reports (2023) [\[See reference 99\]](#) – sets out the progress made in improving the environment through the 25 Year Plan and the indicator framework, which contains 66 indicators arranged into 10 broad themes.

B.86 Environment Agency, Working with nature (2022) [\[See reference 100\]](#) – discusses the importance of nature in providing ecosystem services and presents recent and historical trends in biodiversity. It outlines some of the main pressures affecting England’s habitats, wildlife and ecosystems: land use;

climate change; pollution; invasive non-native species; and hydrological change.

B.87 Defra, Establishing the Best Available Techniques for the UK (UK BAT) (2022) [\[See reference 101\]](#) – sets out a new framework that aims to improve industrial emissions and protect the environment through the introduction of a UK BAT regime. It aims to set up a new structure of governance with a new independent body in the form of Standards Council and the Regulators Group, consisting of government officials and expert regulators from all UK nations. It aims to also establish a new UK Air Quality Governance Group to oversee the work of the Standards Council and the delivery of the requirements under this new framework. It is anticipated that the BATC for the first four industry sectors will be published in the second half of 2023.

B.88 HM Government, The Environment Act 2021 [\[See reference 102\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. Biodiversity elements in the Act include:

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

B.89 Natural England, Climate Change Adaptation Manual (2020) [See reference 103] – a resource to support practical and pragmatic decision-making relating to climate change adaptation. The manual brings together recent science, experience and case studies to be used by managers of nature reserves and other protected sites, conservation and land management advisors, and environmental consultants.

B.90 Defra, Landscapes Review (2019) [See reference 104] – explores the fragmented and often marginalised system of managing National Parks and AONBs recommends actions to achieve structural reform. The review looks at:

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

B.91 HM Government, The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 [See reference 105] – protect biodiversity through the conservation of natural habitats and species of wild fauna and flora, including birds. The Regulations lay down rules for the protection, management and exploitation of such habitats and species, including how adverse effects on such habitats and species should be avoided, minimised and reported.

B.92 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018) [See reference 106] – sets out goals for improving the environment over the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. The gov.uk website notes that the 25 Year Plan sits alongside two other

important government strategies: the Industrial Strategy and Clean Growth Strategy (the former summarised in the Economic growth section below, the latter under Climate Change above).

B.93 HM Government, Environmental Damage (Prevention and Remediation) Regulations 2015 [\[See reference 107\]](#) – wide-ranging government regulations that can potentially apply to many businesses. The regulations oblige those who create environmental damage, whether by water pollution, adversely affecting protected species or sites of special scientific interest (SSSIs), or by land pollution that causes risks to human health, to not only cease the damage, but also to implement a wide variety of remedial measures to restore affected areas.

B.94 Defra, Biodiversity offsetting in England Green Paper (2013) [\[See reference 108\]](#) – biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.95 Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011) [\[See reference 109\]](#) – guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

B.96 Defra Right of Way Circular (1/09) (2011) [\[See reference 110\]](#) – gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way.

B.97 HM Government, The Countryside and Rights of Way Act 2010 [\[See reference 111\]](#) – an Act of Parliament to make new provision for public access to the countryside.

B.98 Defra, Safeguarding our Soils – A Strategy for England (2009) [\[See reference 112\]](#) – sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention on tackling degradation threats, including better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and dealing with contaminated land.

B.99 Defra, England Biodiversity Strategy Climate Change Adaptation Principles (2008) [\[See reference 113\]](#) – sets out principles to guide adaptation to climate change. The principles are take practical action now, maintain and increase ecological resilience, accommodate change, integrate action across all

sectors and develop knowledge and plan strategically. The precautionary principle underpin all of these. Natural Environment and Rural Communities Act 2006.

B.100 HM Government, The Natural Environment and Rural Communities Act 2006 [\[See reference 114\]](#) – places a duty on public bodies to conserve biodiversity.

B.101 HM Government, Wildlife and Countryside Act 1981 (as amended) [\[See reference 115\]](#) – enacted primarily to implement the Birds Directive and Bern Convention in Great Britain. The Act received royal assent on 30 October 1981 and was brought into force in incremental steps. It is supplemented by the Wildlife and Countryside (Service of Notices) Act 1985, which relates to notices served under the 1981 Act. The act contains four parts and 17 schedules, which cover:

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

B.102 HM Government, The National Parks and Access to the Countryside Act 1949 [\[See reference 116\]](#) – an Act of Parliament to make provision for National Parks and the establishment of a National Parks Commission; to confer on the Nature Conservancy and local authorities' powers for the establishment and maintenance of nature reserves; to make further provision for the recording, creation, maintenance and improvement of public paths and for securing access to open country.

Historic environment

B.103 Historic England, Corporate Plan 2023-2026 (2023) [\[See reference 117\]](#) – contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes priorities to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

B.104 Department for Digital, Culture Media & Sport, The Heritage Alliance, The Heritage Statement 2017 [\[See reference 118\]](#) – sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.105 Historic England, Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8 (2016) [\[See reference 119\]](#) – sets out requirements for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

B.106 HM Government, The Government's Statement on the Historic Environment for England 2010 [\[See reference 120\]](#) – sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.107 HM Government, The Planning (Listed Buildings and Conservation Areas) Act 1990 [\[See reference 121\]](#) – an Act of Parliament that changed the laws for granting of planning permission for building works, with a particular focus on listed buildings and conservation areas.

B.108 HM Government, The Ancient Monuments and Archaeological Areas Act 1979 [\[See reference 122\]](#) – a law passed by the UK government to protect the archaeological heritage of England and Wales and Scotland. Under this Act, the Secretary of State has a duty to compile and maintain a schedule of ancient monuments of national importance, in order to help preserve them. It also creates criminal offences for unauthorised works to, or damage of, these monuments.

B.109 HM Government, The Historic Buildings and Ancient Monuments Act 1953 [\[See reference 123\]](#) – an Act of Parliament that makes provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

Water and air

B.110 The National Framework for Water Resources 2025: Water for Growth, Nature and a Resilient Future (2025) [\[See reference 124\]](#) provides a strategic blueprint for managing England's long-term water needs. It emphasises the twin imperatives of securing resilient water supplies to support housing, energy, food production, economic growth, and a thriving natural environment, while safeguarding ecosystems through sustainable abstraction and nature-based solutions. The Framework projects significant pressures on water resources driven by climate change, population growth, and emerging industrial demands, forecasting a shortfall of up to 5 billion litres per day by 2055. It calls for integrated, multi-sector planning across national, regional, and local levels, combining demand management (such as leakage reduction and efficiency improvements) with development of new infrastructure and environmental enhancements.

B.111 Defra, Plan for Water: Our Integrated Plan for Delivering Clean and Plentiful Water (2023) [\[See reference 125\]](#) – sets out actions to transform the management of the water system, deliver cleaner water for nature and people, and secure a plentiful water supply. The Plan also sets out measures to address sources of pollution, and boost water supplies through more investment, tighter regulation, and more effective enforcement.

B.112 The Air quality strategy for England (2023) [\[See reference 126\]](#) – sets out local authorities' powers and responsibilities as well as the actions that Defra expects local authorities to take in support of the governments long-term air quality goals, including new PM2.5 targets.

B.113 The Environment Act 2021 [\[See reference 127\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers:

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

B.114 Environment Agency, Managing Water Abstraction (2021) [\[See reference 128\]](#) – the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.115 CIEEM, National Chalk Streams Strategy (2021) [\[See reference 129\]](#) – built around the “trinity of ecological health”: water quantity, water quality and habitat quality and included 30+ recommendations to Defra, the Environment Agency, Natural England, the water companies, NGOs and stakeholders.

B.116 Environment Agency, Meeting our future water needs: a national framework for water resources (2020) [\[See reference 130\]](#) – sets the strategic direction for long term regional water resources planning. The framework is built on a shared vision to:

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

B.117 Defra, The Clean Air Strategy (2019) [\[See reference 131\]](#) – sets out the comprehensive action that is required from across all parts of Government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.118 Department for Transport, The Road to Zero (2018) [\[See reference 132\]](#) – sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.119 HM Government, Our Waste, Our Resources: A strategy for England (2018) [\[See reference 133\]](#) – aims to increase resource productivity and eliminate avoidable waste by 2050. The Strategy sets out key targets which include: a 50% recycling rate for household waste by 2020, a 75% recycling rate for packaging by 2030, 65% recycling rate for municipal solid waste by 2035 and municipal waste to landfill 10% or less by 2035.

B.120 Environment Agency, The Environment Agency's Approach for Groundwater Protection (2018) [\[See reference 134\]](#) – contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. Many of the approaches set out in the position statements are not statutory but may be included in, or referenced by, statutory guidance and legislation.

B.121 HM Government, The Water Environment (Water Framework Directive) (England and Wales) Regulations (2017) [\[See reference 135\]](#) – protect inland surface waters, transitional waters, coastal waters and groundwater, and outlines the associated river basin management process. These Regulations establish the need to prevent deterioration of waterbodies and to protect, enhance and restore waterbodies with the aim of achieving good ecological and chemical status.

B.122 Defra, The UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (2017) [\[See reference 136\]](#) – sets out the Government's ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra-low emission vehicles, a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help Local Authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.123 Environment Agency, Drought response: our framework for England (2017) [\[See reference 137\]](#) – tells you how drought affects England and how the Environment Agency works with government, water companies and others to manage the effects on people, business and the environment. It aims to ensure consistency in the way we co-ordinate drought management across England. It sets out:

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

B.124 HM Government, The Nitrate Pollution Prevention Regulations (2016) [\[See reference 138\]](#) – provides for the designation of land as nitrate vulnerable zones and imposes annual limits on the amount of nitrogen from organic manure that may be applied or spread in a holding in a nitrate vulnerable zone. The Regulations also specify the amount of nitrogen to be spread on a crop and how, where and when to spread nitrogen fertiliser, and how it should be stored. It also establishes closed periods during which the spreading of nitrogen fertiliser is prohibited.

B.125 HM Government, The Water Supply (Water Quality) Regulations (2016) [\[See reference 139\]](#) – focus on the quality of water for drinking, washing, cooking and food preparation, and for food production. Their purpose is to protect human health from the adverse effects of any contamination of water intended for human consumption by ensuring it is wholesome and clean.

B.126 HM Government, The Environmental Permitting Regulations (2016) [\[See reference 140\]](#) – streamline the legislative system for industrial and waste installations into a single permitting structure for those activities which have the potential to cause harm to human health or the environment. They set out how to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment and human health.

B.127 HM Government, The Air Quality Standards Regulations (2016) [\[See reference 141\]](#) – set out limits on concentrations of outdoor air pollutants that impact public health, most notably particulate matter (PM10 and PM2.5) and nitrogen dioxide (NO₂). It also sets out the procedure and requirements for the designation of Air Quality Management Areas (AQMAs).

B.128 Defra, The Water White Paper (2012) [\[See reference 142\]](#) – sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.129 HM Government, The National Policy Statement for Waste Water (2012) [\[See reference 143\]](#) – sets out Government policy for the provision of major waste water infrastructure. The policy set out in this NPS is, for the most part, intended to make existing policy and practice in consenting nationally significant waste water infrastructure clearer and more transparent.

B.130 HM Government, The Flood and Water Management Act 2010 [\[See reference 144\]](#) and The Flood and Water Regulations (2019) [\[See reference 145\]](#) – sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.131 HM Government, Groundwater (England and Wales) Regulations (2009) [\[See reference 146\]](#) – implement in England and Wales Community legislation on pollution of groundwater. They provide rules for the granting by the Environment Agency of a permit under these Regulations, consent under section 91(8) of the Water Resources Act 1991 and (with exceptions) an environmental permit under the Environmental Permitting (England and Wales) Regulations. In addition, the Regulations create an offence of discharge of a hazardous substance or non-hazardous pollutant without a permit, provide for powers of enforcement of the Environment Agency and prescribe penalties for offences committed under these Regulations.

B.132 HM Government, Flood Risk Regulations (2009) [\[See reference 147\]](#) – these Regulations outline a set of tasks, which the county council is required to follow between now and approximately 2015. The regulations also implement the 2007 EU Floods Directive. In accordance with the regulations the council has a series of new responsibilities, these are:

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

B.133 HM Government, Future Water: The Government's Water Strategy for England (2008) [\[See reference 148\]](#) – sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.134 Defra, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (2007) [\[See reference 149\]](#) – sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy’s objectives. The objectives of the strategy are to:

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

B.135 HM Government, The Environmental Noise Regulations (2006) [\[See reference 150\]](#) – apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at workplaces; inside means of transport; or military activities in military areas.

B.136 HM Government, The Urban Waste Water Treatment Regulations (2003) [\[See reference 151\]](#) – protect the environment from the adverse effects of urban waste water discharges and certain industrial sectors, notably domestic and industrial waste water. The regulations require the collection of waste water and specifies how different types of waste water should be treated, disposed and reused.

B.137 HM Government, The Environmental Protection Act (1990) [\[See reference 152\]](#) – makes provision for the improved control of pollution to the air, water and land by regulating the management of waste and the control of emissions. Seeks to ensure that decisions pertaining to the environment are made in an integrated manner, in collaboration with appropriate authorities, non-governmental organisations and other persons.

Economic growth

B.138 Infrastructure: A 10 Year Strategy (2025) [\[See reference 153\]](#) sets out an integrated plan to transform economic, housing and social infrastructure over the next decade. It commits to at least £725 billion in public investment,

supplemented by private financing via carefully targeted public-private partnership models and a new National Wealth Fund. The strategy introduces multiyear capital budgets (initially five-year, reviewed biennially) and establishes the National Infrastructure and Service Transformation Authority (NISTA) to unify planning, improve project delivery, assure major schemes, and coordinate a transparent Infrastructure Pipeline launched in July 2025. It aims to boost growth, align infrastructure with government missions, including housing, clean energy, public services and net zero, reduce planning delays, build institutional capacity, support supply chains and skills development, and provide stability and clarity to investors.

B.139 The UK's Modern Industrial Strategy (2025) [\[See reference 154\]](#) outlines a 10 year plan to boost business investment and elevate the UK's performance in eight designated growth driving sectors: advanced manufacturing; clean energy industries; creative industries; defence; digital and technologies; financial services; life sciences; and professional & business services. The strategy aims to provide long term stability and certainty to encourage both domestic and international investment, through sector plans, streamlined regulation, enhanced access to finance, including via the National Wealth Fund and British Business Bank, and by accelerating grid connections and infrastructure delivery. It includes regional and place-based initiatives, with targeted support for city regions, industrial clusters and Industrial Strategy Zones to drive inclusive growth across the UK . The strategy is also supported by a robust monitoring framework overseen by a newly established Industrial Strategy Advisory Council, and embeds vocabulary around long-termism, pro-business engagement, competition policy, skills development and innovation.

B.140 The Plan for Change (2024) [\[See reference 155\]](#) outlines the UK Government's framework for long-term policy delivery across five priority areas: economic growth, healthcare, public safety, opportunity, and clean energy. It sets out specific targets within this Parliament, underpinned by aims to ensure economic stability, reform public services, and implement a more mission-focused approach to governance.

B.141 UK Parliament, The Levelling Up and Regeneration Act (2023) [\[See reference 156\]](#) – sets out the direction for planning and makes provisions to support the levelling-up agenda. It seeks to streamline the planning process whilst attaching greater weight to development plans. It also aims to improve infrastructure delivery with a new levy system, improve alignment between plans to address cross-boundary issues, and will introduce added protection for heritage assets. The Act also states that existing EU-generated systems of

SEA, HRA and EIA will eventually be replaced by a simpler process known as ‘Environmental Outcomes Reports’.

B.142 The Department for Levelling Up, Housing and Communities, Levelling Up the United Kingdom White Paper (2022) [\[See reference 157\]](#) – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030. Missions which relate to economy and employment state that by 2030:

- Pay, employment and productivity will have risen in every area of the UK, with each containing a globally competitive city, with the gap between the top performing and other areas closing.
- The number of people successfully completing high-quality skills training will have significantly increased in every area of the UK. In England, this will lead to 200,000 more people successfully completing high-quality skills training annually, driven by 80,000 more people completing courses in the lowest skilled areas.
- Domestic public investment in Research & Development outside the Greater South East will increase by at least 40% and at least one third over the Spending Review period, with that additional government funding seeking to leverage at least twice as much private sector investment over the long term to stimulate innovation and productivity growth.
- Every part of England that wants one will have a devolution deal with powers at or approaching the highest level of devolution and a simplified, long-term funding settlement.

B.143 HM Treasury, The Growth Plan (2022) [\[See reference 158\]](#) – makes growth the government’s central economic mission, setting a target of reaching a 2.5% trend rate. Sustainable growth will lead to higher wages, greater opportunities and provide sustainable funding for public services. The Chancellor of the Exchequer’s “growth plan” contained a raft of significant tax measures, with major changes being announced for both individuals and businesses.

B.144 HM Treasury, Build Back Better: Our Plan for Growth (2021) [\[See reference 159\]](#) – sets out a plan to ‘build back better’ tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

B.145 Defra, The Agricultural Transition Plan 2021 to 2024 (2020) [\[See reference 160\]](#) – aims to drive competitiveness, increase productivity, reduce carbon emissions, and generate fairer returns across the agricultural industry. The Transition Plan introduces several new schemes to improve the environment, animal health and welfare, and farm resilience and productivity (e.g., grants will be available for sustainable farming practices, creating habitats for nature recovery and making landscape-scale changes such as establishing new woodland and other ecosystem services).

B.146 HM Government, The Agriculture Act (2020) [\[See reference 161\]](#) sets out how farmers and land managers in England will be rewarded in the future with public money for “public goods” – such as better air and water quality, thriving wildlife, soil health, or measures to reduce flooding and tackle the effects of climate change, under the Environmental Land Management Scheme. The Act will help farmers to stay competitive, increase productivity, invest in new technology and seek a fairer return from the marketplace. Agricultural Transition Plan 2021 to 2024.

B.147 HM Government, UK Industrial Strategy: Building a Britain fit for the future (2018) [\[See reference 162\]](#) – lays down a vision and foundations for a transformed economy. Areas including artificial intelligence and big data; clean growth; the future of mobility; and meeting the needs of an ageing society are identified as the four ‘Grand Challenges’ of the future.

B.148 LEP Network, The LEP Network Response to the Industrial Strategy Green Paper Consultation (2017) [\[See reference 163\]](#) – seeks to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long-term Industrial Strategy.

B.149 Infrastructure and Projects Authority, The National Infrastructure Delivery Plan 2016-2021 (2016) [\[See reference 164\]](#) – brings together the Government’s plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

Transport

B.150 The Department for Transport, Future of Transport: supporting rural transport innovation (2023) [\[See reference 165\]](#) – shows how innovative and emerging transport technologies could address some of the major challenges in

rural communities. It highlights the importance of transport to everyday life rural life and provides guiding principles for the introduction of new technologies and services.

B.151 The Department for Levelling Up, Housing and Communities, Levelling Up the United Kingdom White Paper (2022) [\[See reference 166\]](#) – sets out how the UK Government will spread opportunity more equally across the UK. It comprises 12 UK-wide missions to achieve by 2030, which includes the following key mission relating to transport and travel:

- By 2030, local public transport connectivity across the country will be significantly closer to the standards of London, with improved services, simpler fares and integrated ticketing.

B.152 Secretary for Transport, The Cycling and Walking Investment Strategy Report to Parliament (2022) [\[See reference 167\]](#) – sets out the objectives and financial resources for cycling and walking infrastructure. It states the Government's long-term ambition is to make walking and cycling the natural choices for shorter journeys. It aims to double cycling by 2025, increase walking activity, increase the percentage of children that usually walk to school and reduce the number of cyclists killed or seriously injured on England's roads.

B.153 Department for Transport, Future of freight plan (2022) [\[See reference 168\]](#) – the vision is to create a freight and logistics sector that is cost-efficient, reliable resilient, environmentally sustainable and valued by society. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas:

- National Freight Network (NFN)
- Enabling the transition to net zero
- Planning
- People and skills
- Data and technology

B.154 Department for Transport, Decarbonising Transport: A Better, Greener Britain (2021) (Decarbonising Transport Plan (DTP)) [\[See reference 169\]](#) – sets out the Government's commitments and the actions needed to decarbonise the entire transport system in the UK. It follows on from the Decarbonising Transport: Setting the Challenge report published in 2020. The DTP commits the UK to phasing out the sale of new diesel and petrol heavy goods vehicles by 2040, subject to consultation, in addition to phasing out the sale of polluting cars

and vans by 2035. The DPT also sets out how the government will improve public transport and increase support for active travel, as well as creating a net zero rail network by 2050, ensuring net zero domestic aviation emissions by 2040, and a transition to green shipping.

B.155 HM Government, The Environment Act 2021 [\[See reference 170\]](#) – sets statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water, and resource efficiency and waste reduction. It also establishes the Office for Environmental Protection which will act as an impartial and objective body for the protection and improvement of the environment. The Act sets out legislation which covers local air quality management frameworks and the recall of motor vehicles.

B.156 Department for Transport, Decarbonising Transport: Setting the Challenge (2020) [\[See reference 171\]](#) – sets out the strategic priorities for the new Transport Decarbonisation Plan (TDP), published in July 2021. It sets out in detail what government, business and society will need to do to deliver the significant emissions reduction needed across all modes of transport, putting us on a pathway to achieving carbon budgets and net zero emissions across every single mode of transport by 2050. This document acknowledges that while there have been recently published strategies to reduce greenhouse gas emissions in individual transport modes, transport as a whole sector needs to go further and more quickly, therefore the TDP takes a coordinated, cross-modal approach to deliver the transport sector's contribution to both carbon budgets and net zero.

B.157 Department for Transport, Jet Zero Strategy Delivering net zero aviation by 2050 (2020) [\[See reference 172\]](#) – aims to reduce in-sector emissions from aviation by around 50% by 2050. The strategy is underpinned by three principles:

- International leadership: Leading coordinated global efforts to tackle international aviation emissions, including through ongoing work in the International Civil Aviation Organization.
- Delivered in partnership: Working with all parts of the sector and different partners to develop, test, implement and invest in the solutions needed.
- Maximising opportunities: Using the opportunity of the Jet Zero transition to boost the economy, create new jobs, develop new industries, and become a more energy secure nation.

B.158 Department for Transport, The Road to Zero (2018) [\[See reference 173\]](#) – sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It

explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

B.159 Department for Transport, The Transport Investment Strategy 2017 [\[See reference 174\]](#) – sets out four objectives that the strategy aims to achieve:

- Create a more reliable, less congested, and better connected transport network that works for the users who rely on it;
- Build a stronger, more balanced economy by enhancing productivity and responding to local growth priorities;
- Enhance our global competitiveness by making Britain a more attractive place to trade and invest; and
- Support the creation of new housing.

B.160 Highways England, The Highways England Sustainable Development Strategy and Action Plan (2017) [\[See reference 175\]](#) – designed to communicate the company's approach and priorities for sustainable development to its key stakeholders. Highways England aims to ensure its action in the future will further reduce the impact of its activities seeking a long-term and sustainable benefit to the environment and the communities it serves. The action plan describes how Highways England will progress the aspirations of their Sustainable Development and Environment Strategies. It describes actions that will enable the company to deliver sustainable development and to help protect and improve the environment.

B.161 Department for Transport, Airports: The Government's View Summary Document – Moving Britain Ahead (2016) [\[See reference 176\]](#) – supports the construction of a new runway at Heathrow airport to provide strategic and economic benefits to the UK, offering the best deal for passengers and increasing the number of UK airports connected to Heathrow.

B.162 Department for Transport, Door to Door: A strategy for improving sustainable transport integration (2013) [\[See reference 177\]](#) – focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options;
- Convenient and affordable tickets;

- Regular and straightforward connections at all stages of the journey and between different modes of transport; and
- Safe and comfortable transport facilities.

B.163 The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

Sub-national plans and programmes of most relevance to the Local Plan

B.164 Kent County Council, The Kent Minerals and Waste Local Plan 2024–2039 (2025) [See reference 178] provides the statutory framework for the sustainable management of minerals supply and waste infrastructure across the county. It replaces the previous 2013–2030 Plan and sets out policies to ensure a steady and adequate supply of minerals, while safeguarding important resources and facilities from conflicting development. The Plan also establishes the spatial strategy for new and existing waste management capacity to meet future growth needs, support the transition to a circular economy, and address climate change commitments. For Tonbridge and Malling, the Plan is directly relevant as it identifies mineral safeguarding areas, waste management capacity requirements, and policies that influence the location, design, and delivery of new development, ensuring that growth in the borough is compatible with the county’s minerals and waste planning objectives.

B.165 Kent Council Leaders, Kent Interim Plan for Local Government Reorganisation 2025 [See reference 179] sets out the position of the 14 Kent Council leaders in developing proposals for local government reorganisation. It establishes certain principles in response to the Ministerial letter of 5th February 2025, including structures, processes and timelines for submitting a proposal to Government.

B.166 Kent County Council, Commissioning Plan for Education Provision in Kent 2025-2029 (2025) [See reference 180] – a five year rolling plan which serves as a strategic framework to ensure that there are sufficient educational places available in the right locations to meet the needs of all learners. It focuses on planning for future demand, addressing demographic changes, and ensuring that high-quality education is accessible to all students, including those with special educational needs and disabilities (SEND).

B.167 Tonbridge and Malling Borough Council, Annual Service Delivery Plan 2025/26 (2025) [\[See reference 181\]](#) – sets out the priority actions for the year, along with key milestones and targets that could be used to monitor whether the Council was on track with delivery. The Plan also provided the opportunity to realign the Key Performance Indicators, strengthened accountability and aligned priorities with budget setting.

B.168 Kent County Council, Local Transport Plan 5: Striking the Balance 2024 – 2037 (2024) [\[See reference 182\]](#) – provides the overarching strategy for the full transport mix in Kent. It outlines ambitions, outcomes, and objectives to be delivered by proposals in the plan to enhance transport across Kent over the next 13 years. The plan aims to improve all types of journeys by focusing on roads, public transport, walking, cycling, and other modes of travel.

B.169 Kent County Council, Local Flood Risk Management Strategy 2024 – 2034 (2024) [\[See reference 183\]](#) – sets out how local flood risk will be managed in the county by the local authorities involved. The strategy is designed to reduce the risk of flooding in Kent by providing a framework for managing surface water, groundwater, and ordinary watercourse flooding. The objectives of the local strategy are:

- Improve Risk Management Authorities' understanding of local flood risk mechanisms in Kent including the risks resulting from climate change, and to share this understanding with partners to create an evidence base for flood risk and climate adaptation.
- Protect the people and businesses of Kent from flooding through the delivery of flood risk management projects and programmes using new or innovative techniques where appropriate.
- Development and infrastructure delivery in Kent takes an active role in flood risk management, taking opportunities to manage on-site and off-site flood risk.
- Residents and businesses of Kent are able to better prepare, understand and manage their own flood risk as appropriate, by having access to relevant flood risk information and support from risk management authorities. Communities and individuals are empowered to act to protect themselves from flooding through individual efforts, partnerships and joint working.
- NHS Kent and Medway, Medway Joint Local Health and Wellbeing Strategy 2024 – 2028 (2024) [\[See reference 184\]](#) provides a high-level framework for improving health and well-being in Medway. The strategy is

used to inform commissioning across the health and care system. The strategy covers 4 main themes for Medway:

- healthier, longer lives for everyone
- reduce poverty and inequality
- safe, connected and sustainable places
- connected communities and cohesive services.

B.170 Tonbridge and Malling Borough Council, Tonbridge and Malling Community Safety Partnership Plan 2024-2025 (2024) [\[See reference 185\]](#) – sets out the objectives that the Partnership will work towards to address community safety issues in the Borough over the coming year. The plan is based on a Strategic Assessment that uses current data and trends to identify priorities aimed at reducing and addressing crime and disorder in the area. The priorities agreed through the Strategic Assessment for 2024/25 are:

- Anti-Social Behaviour – including environmental crime
- Acquisitive Crime – including shoplifting, theft and burglary
- Domestic Abuse
- Preventing Extremism and Hate
- Safeguarding Vulnerable people – including mental health, child criminal sexual exploitation, gangs, modern slavery and human trafficking, substance misuse and youth diversion
- Tackling violent crime – including Serious Violence, Violence Against Women and Girls and Stalking

B.171 High Weald National Landscape, The High Weald National Landscape AONB Management Plan 2024-2029 (2024) [\[See reference 186\]](#) – outlines a strategic approach to conserving and enhancing the area's natural beauty, biodiversity, and cultural heritage.

B.172 Tonbridge and Malling Heritage Strategy (2025) [\[See reference 187\]](#) aims to provide an evidence-based Vision for the Borough's historic environment to inform and support the Local Plan. Part One identifies and assesses heritage within the Borough, and outlines a set of key heritage 'Themes', which characterise the Borough's unique heritage. This is followed in Part Two by a plan for a Positive Strategy, which includes examination of how heritage can be a driver for Positive Change within the borough, followed by a list of the Challenges facing the borough's heritage and potential responses to

address these. The Strategy's findings will feed into the Strategic Aims which will set out the Council's next steps.

B.173 Tonbridge and Malling Borough Council Corporate Strategy 2023-2027 (2023) [\[See reference 188\]](#) – follows on from the 2020-2023 Corporate Strategy. It provides a vision for the next three years for the Council to continue to be financially sustainable with strong leadership that delivers valued services and a commitment to delivering innovation and change to meet the needs of the borough.

B.174 Tonbridge and Malling Borough Council Economic Development Strategy 2023-2027 [\[See reference 189\]](#) – focuses on fostering a resilient, dynamic, and inclusive economy. The strategy emphasises the need for sustainable growth through “Investing in our local economy to help support residents and businesses and foster sustainable growth.” Key initiatives the strategy focuses on includes efforts to market Tonbridge and Malling as a tourism destination, and offers various initiatives, such as grants and mentoring for local businesses. This includes green grants designed to help at least 20 businesses reduce their carbon footprints.

B.175 Kent County Council, Kent Drug and Alcohol Strategy 2023-2028 (2022) [\[See reference 190\]](#) – seeks to address the harms associated with alcohol and drug use, with a focus on fostering partnerships to tackle both the root causes and the consequences of substance abuse.

B.176 Southern Water, Medway River Basin Catchment Drainage and Wastewater Management Plan (2022) [\[See reference 191\]](#) – identifies the main challenges relating to drainage and wastewater systems as the growing population, the changing climate and environmental need. The plan aims to:

- Reduce the number of spills from the 238 storm overflows which together currently spill around 4,300 times per annum.
- Separate or attenuate excess rainwater in the sewer networks to reduce the risks of flooding and frequency of storm overflow discharges, especially in Motney Hill, Ticehurst, Hildenborough, High Halden, Penshurst and Gravesend.
- Investigate the potential impact of wastewater discharges on the Swale and Medway Estuary and Marshes and identifying the requirements to achieve nutrient neutrality and Good Ecological Status/Potential.

- Plan for potential significant developments at Northfleet, Rochester Riverside, Hoo, Chatham Docks, Paddock Wood, Tudley, South Godstone, Ebbsfleet and the Invicta Park Barracks at Maidstone.
- Improve the resilience of our networks and treatment works to prevent pollution incidents, particularly in Tunbridge Wells, Crowborough, Hildenborough and Paddock Wood.
- Reduce the risk of sewer blockages by increasing sewer jetting and targeting customer campaigns to reduce the amount of FOG (fats, oils and grease) and non-flushables in the sewer network around Rochester, Gillingham and Chatham.

B.177 Reduce the risk to groundwater by reducing leakage from our sewers in the Sittingbourne, Strood, Rochestester, Chatham, Gillingham and Rainham areas

B.178 Kent County Council, Framing Kent's Future 2022 – 2026 (2022) [\[See reference 192\]](#) – sets out the priorities that the Council will focus on over the next four years to tackle the challenges and make the most of the opportunities that the county is facing. The strategy is based around four key priorities that will frame the Council's response to the challenges and opportunities up to 2026:

- Levelling up Kent – The momentum of the national Levelling Up agenda will be used make Kent a successful place and narrow the gaps in outcomes between different parts of Kent and between Kent and the rest of the South East.
- Infrastructure for communities – as the county continues to grow, the Council will seek to ensure that all communities, new and existing, have the right infrastructure around them for a good quality of life.
- Environmental step change – Kent County Council plans to build on its efforts to achieve ambitious Net Zero targets while addressing the climate impacts already being experienced. This includes protecting and enhancing the natural environment, collaborating with partners to make Kent Net Zero by 2050.
- New models of care and support – the Council aims to take advantage of opportunities to address the demand and resource challenges facing people-based services, with a focus on providing better care and support. This includes integrating social care and public health services with partners and supporting vulnerable children and families.

B.179 Kent County Council, Making A Difference Everyday: Our Adult Social Care Strategy 2022 to 2027 (2022) [\[See reference 193\]](#) – outlines Kent’s vision for social care, seeking to support residents to live as full and safe a life as possible and make informed choices.

B.180 Tonbridge and Malling Borough Council, Air Quality Action Plan (2022) [\[See reference 194\]](#) – outlines four key priority areas. The overarching aim of this Action Plan is to address the AQMA and further aid a behavioural shift to promote sustainable methods of transport. This will help reduce the levels of harmful pollutants and the potential threat to health and well-being of the population within the borough.

B.181 Across the transport sector, the Air Quality Action Plan intends to implement a series of measures to achieve the overarching aim – these include developing a Quality Bus Partnership Scheme, encouraging taxi/private hire companies to switch to low emission vehicles, and developing Freight Quality Partnerships in addition to other measures. From a planning and infrastructure perspective, the Council outlines the additional measures including the installation of electric charging points and installation of green walls and vegetation across the borough. These measures need to be considered for any future development.

B.182 Tonbridge and Malling Borough Council: Borough Economic Recovery Strategy 2021-2023 (2021) [\[See reference 195\]](#) – seeks address the economic recovery following the COVID-19 pandemic and the severity of its effect on business activity on both national and local levels.

B.183 Kent Downs National Landscape, The Kent Downs National Landscape Management Plan 2021-2026 (2021) [\[See reference 196\]](#) – seeks to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened well into the future.

B.184 Tonbridge & Malling Borough Council Housing Delivery Test Action Plan (2021) [\[See reference 197\]](#) – outlines the issues affecting the housing supply in Tonbridge and Malling Borough and identifies actions to help boost the delivery of new homes, which include the adoption of the up-to-date Local Plan, development of an Urban Capacity Study, and through Planning Performance Agreements (PPAs).

B.185 Kent Nature Partnership, Biodiversity Strategy 2020 to 2045 (2020) [\[See reference 198\]](#) – sets out how the county will deliver healthy sustainable and coherent biodiversity in Kent. It aims to provide a natural environment that

inspires citizen engagement and is well used and appreciated, so that the health and well-being of such connection can be realised by Kent County's residents.

B.186 Draft Kent and Medway Local Nature Recovery Strategy (2025) [\[See reference 199\]](#)

B.187 Tonbridge and Malling Borough Council, Climate Change Strategy 2020 – 2030 (2020) [\[See reference 200\]](#) – sets out how the Borough Council intends to address climate change along with the Strategy to achieve the aspiration of a carbon neutral borough by 2030.

B.188 Kent County Council, Kent and Medway Energy and Low Emissions Strategy Implementation Plan 2020-2023 (2020) [\[See reference 201\]](#) – sets out the response to the UK climate emergency and promotes clean and resilient economic recovery that eliminates poor air quality, reduces fuel poverty and promotes the development of an affordable, clean and secure energy supply across Kent and Medway.

B.189 Kent County Council, Active Travel Strategy 2018/2019 (2018) [\[See reference 202\]](#) – builds on the statutory transport, environment and road safety policies to promote walking and cycling as a regular means of travel. The Strategy sets out actions to ingrate active travel into planning, provide and maintain appropriate routes for active travel and support active travel within the community.

B.190 Kent County Council, Growth and Infrastructure Framework (2018) [\[See reference 203\]](#) – provides a strategic framework across a range of infrastructure for planned growth up to 2031. The Framework covers all forms of infrastructure to support the economic, environmental, and social needs of Kent and Medway and allows growth and infrastructure requirements to be considered over a spatial perspective.

B.191 Tonbridge and Malling Borough Council, Contaminated Land Inspection Strategy (2016) [\[See reference 204\]](#) – seeks provide a system for the identification and remediation of land where contamination is causing an unacceptable risk to human health or the wider environment because of the historic or current use and circumstances of the land. The Strategy highlights the principles of pollutant linkages and the three components of contaminant risk: contaminant, receptor and pathway.

B.192 Kent County Council, Kent Environment Strategy (2016) [\[See reference 205\]](#) – identifies the significant environmental challenges for Kent County currently and into the future.

B.193 Tonbridge and Malling Borough Council, Tonbridge and Malling Cycling Strategy 2014-2019 (2014) [\[See reference 206\]](#) – collates the relevant policies and related action plans to promote cycling and the development of appropriate cycling facilities throughout the borough.

B.194 Kent County Council, Kent Joint Health and Wellbeing Strategy (2014) [\[See reference 207\]](#) – seeks to improve health and well-being outcomes, deliver better coordinated care, and improve the public's experience of integrated health and social care services in the county.

B.195 Kent County Council, Kent Design Guide (no date) [\[See reference 208\]](#) – seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas.

B.196 Tonbridge and Malling Borough Council, Managing Development and the Environment 2010 [\[See reference 209\]](#) – forms part of the Local Development Framework for Tonbridge and Malling. The document aims to set out the policy direction to deliver the following aim: “to manage development so that environmental quality is maintained and enhanced whilst preserving a sense of place” as well as achieving the best balance between the built and natural environment.

B.197 Tonbridge and Malling Borough Council, Local Development Framework – Tonbridge Central Area Action Plan 2008 [\[See reference 210\]](#) – considers the access movement and connectivity, town centre profile, the role of water, design quality and different character areas in the central area of Tonbridge.

B.198 Tonbridge and Malling Borough Council, Local Development Framework – Development Land Allocations 2008 [\[See reference 211\]](#) – forms part of the Local Development Framework for Tonbridge and Malling. The document lists, and specifically identifies on the Proposals Map, all development sites necessary to meet the needs of the area as identified in general terms in the Core Strategy.

B.199 Tonbridge and Malling Borough Council (various dates) Character Area Appraisals SPD [\[See reference 212\]](#) – supplements Policy SQ1 (Landscape and Townscape Protection and Enhancement) in the Managing Development and the Environment DPD, providing more detail on the character of the main built-up areas in the borough.

B.200 Tonbridge and Malling Borough Council Affordable Housing Supplementary Planning Document 2008 [\[See reference 213\]](#) – a supplementary planning document founded on the need for affordable housing in Tonbridge and Malling.

B.201 Tonbridge and Malling Borough Council, Local Development Framework – Core Strategy (Adopted 2007) [\[See reference 214\]](#) – sets the general locations for the delivery of housing and other strategic development requirements and broad areas of constraint for developments until 2021. This Strategy enables the social, economic, and environmental needs of the borough to be met in a sustainable way.

B.202 Tonbridge and Tunbridge Wells – Tonbridge Urban Transport Delivery Strategy 2007 [\[See reference 215\]](#) – sets the context for modelling work in support of the Tonbridge Central Area Action Plan. The Strategy seeks to identify ways to regenerate and improve connectivity within Tunbridge and Tunbridge Wells.

Surrounding development plans

B.203 The adopted Local Plans for the local authority areas surrounding Tonbridge and Malling which could potentially contribute to in-combination effects with the new Tonbridge and Malling Local Plan are outlined below.

B.204 Maidstone Borough Local Plan Review 2021-2038 (adopted March 2024) – The Local Plan Review sets out the framework for development in the borough until 2038. This includes provision of 19,669 dwellings and 543 pitches for Gypsies, Travellers and Travelling Showpeople. During the plan period, the Maidstone Borough Council also plans to provide for 119,250m² of employment floorspace, and a minimum of 14,360m² of retail, food and beverage floorspace, all of which can met through land allocations and the Maidstone Town Centre Broad Location in the Local Plan. The Local Plan Review was adopted by Full Council on 20 March 2024 following receipt of the Inspector's Final Report on 8 March 2024.

B.205 Tunbridge Wells' Development Plan comprises their Site Allocations Local Plan (adopted 2016), Core Strategy (adopted 2010) and saved Local Plan 2006 policies. The Core Strategy sets out the amount of development required across the borough to 2026 and is the central part of the Development Plan for the borough. During the Plan period, up to 6,000 additional homes must be provided in the borough. In addition, over the period to 2017, 26,500m² of additional (non-food) floorspace will also be provided. A new Local Plan,

covering the period up to 2038, has completed its Examination and Main Modifications consultation in April 2025.

B.206 Sevenoaks District Council's Local Plan comprises their Core Strategy (adopted 2011) and Allocations and Development Management Plan (adopted 2015). The Core Strategy sets out the vision and policies for future development in the district over the period to 2026. This includes the provision of 165 dwellings (net addition) on average, annually, equivalent to 3,300 new dwellings over the period 2006 to 2026. The majority of new housing development will be focused in the urban areas of Sevenoaks and Swanley. The strategy will also deliver 86.1ha of employment land, predominately in Sevenoaks, Swanley and Edenbridge. Sevenoaks District Council's Allocations and Development Management Plan includes specific allocations for open space, residential, employment and mixed-use development across the district. With regard to new housing development, most of the new units will be concentrated in the Sevenoaks Urban Area, with approximately 163 units planned. In relation to employment sites, 69.6ha of existing employment sites will be retained, intensified and regenerated. The largest of these is at Station Road, Edenbridge, with a total of 18.8ha, followed by Vestry Road, Sevenoaks, with a total of 11.3ha. Sevenoaks District Council is now preparing a new Local Plan to 2040. A second Regulation 18 consultation ran between November 2023 and January 2024, and the next version of the Local Plan is expected in autumn 2025.

B.207 Gravesham Borough Council's Local Plan Core Strategy (2014) sets out the Council's long-term spatial vision for the borough and covers the period from April 2011 to March 2028. This includes the provision of at least 6,170 new dwellings and 186,490m² employment floorspace. The development will be distributed through the borough as follows: 3,890 new dwellings in addition the employment floorspace will be provided in the Opportunity Areas at Northfleet Embankment and Swanscombe Peninsula East, Gravesend Riverside East and North East Gravesend, Ebbsfleet and Gravesend Town Centre, and on land at the Coldharbour Road Key Site; and around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt. The Council is reviewing the Core Strategy to look ahead to 2037, with evidence indicating a housing need of around 10,700 dwellings, which may involve Green Belt release. Two Regulation 18 consultations on the Site Allocations and Development Management Policies document have already been held.

B.208 The Medway Local Plan was adopted in 2003. The policies were due to expire in September 2007 and so Medway Council applied to the Secretary of

State to save those policies which remained in conformity with national and sub-national planning policies. Medway Council is currently working on their new Local Plan, which will replace the 2003 one. The new Local Plan will guide the development and use of land in Medway from 2022 until 2041. A Regulation 19 consultation was undertaken in July to August 2025, and the Council is aiming to submit the new Plan for independent examination by early 2026.

Appendix C

Baseline information

C.1 Baseline information provides the basis for predicting and monitoring the likely sustainability effects of a plan and helps to identify key sustainability issues and means of dealing with them.

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

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

C.3 This section presents the relevant baseline information for Tonbridge and Malling Borough. Data referred to have been chosen primarily for regularity and consistency of collection, to enable trends in the baseline situation to be established, and also to enable subsequent monitoring of potential sustainability effects.

Climate change adaptation and mitigation

Climate change

C.4 Climate change presents a global risk, with a range of different environmental, social and economic impacts that are likely to be felt within Tonbridge and Malling Borough across numerous receptors. A key challenge in protecting the environment will be to tackle the causes and consequences of climate change. The consequences include predictions of warmer, drier summers and wetter winters with more severe weather events all year, as well as higher sea levels and increased river flooding. A strong reaction is required

from planning to ensure appropriate action can be taken to help species and habitats adapt and to enable the agricultural sector to continue to deliver diverse, affordable and good quality produce.

C.5 There has been a general trend towards warmer average temperatures in recent years. 2024 was provisionally the fourth warmest year on record for the UK, with a mean temperature of 9.78°C, which is 0.64°C above the 1991-2020 average. Only 2022, 2023 and 2014 recorded higher average temperatures. All the top ten warmest years for the UK in the series from 1884 have occurred since 2000, with five of them in the most recent decade [\[See reference 216\]](#).

C.6 Tonbridge and Malling Borough Council's Climate Change Strategy 2020-2030 states that, based on the Paris Agreement's commitment for staying "well below 2°C and pursuing 1.5°C global temperature rise", the Tyndall Centre for Climate Research recommends that Tonbridge and Malling Borough stays within a maximum cumulative CO₂ emissions budget of 6.4 million tonnes (MtCO₂) between 2020 and 2100 [\[See reference 217\]](#). According to 2017 CO₂ emissions, Tonbridge and Malling Borough Council will use the entire budget by 2027. To remain within the recommended budget, the borough needs to transition from fossil fuels. Therefore, the overarching commitment of the Council is to be carbon neutral by 2030.

C.7 The Tonbridge and Malling Borough Climate Change Strategy 2020-2030 states that the borough currently experiences hotter, drier summers and warmer, wetter winters. This has resulted in increased severe weather incidents such as storms and flooding. The Council has recently worked with Kent County Council to produce the Kent County Council Climate Change Adaptation Plan 2025-2028, which was recommended for adoption in December 2024 [\[See reference 218\]](#).

C.8 A summary of UK Climate Projections 2018 (UKCP2018) for Kent County identified the following climate changes:

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

C.9 The Intergovernmental Panel on Climate Change AR6 Synthesis Report (2023) highlights that an increase in greenhouse gas emissions is predicted to continue into 2030 making it likely that global warming will exceed 1.5°C, which in turn means that it will become harder to maintain global temperatures below

2°C. This will elicit climate hazards such as increased incidences of heatwaves, droughts, increased global monsoon precipitation, tropical storms, very wet and very dry weather. Natural land and ocean carbon sinks will become less effective, sea levels will rise, become more acidic and experience deoxygenation amongst other climate events [\[See reference 219\]](#). The Paris Agreement is a legally binding international treaty involving 196 parties. The overarching goal of this agreement is to limit global warming increasing to 1.5°C by the end of the century. Achieving this goal still requires a lot of action but since 2016 when the agreement was established, low carbon solutions and new markets for climate resilience have emerged.

C.10 The climate emergency declaration and aim for carbon neutrality increase the urgency and need for new development to be net zero carbon. The Tyndall Centre has identified a carbon budget for local authorities in England. For Tonbridge and Malling, it is recommended that the borough should:

- Stay within a maximum cumulative carbon dioxide emissions budget of 6.4 million tonnes (MtCO₂) for the period of 2020 to 2100.
- Deliver cuts in emissions averaging a minimum of 12.9% per year to ensure a Paris Agreement aligned carbon budget.
- Reach zero or near zero carbon no later than 2042 [\[See reference 220\]](#).

C.11 Carbon dioxide is the principal greenhouse gas. Tonbridge and Malling Borough Council's Climate Change Strategy 2020 to 2030 outlines how the Council will address the causes and consequences of climate change and includes an aim for Tonbridge and Malling Borough to become a carbon neutral Council and a carbon neutral area by 2030 [\[See reference 221\]](#).

Carbon dioxide emissions

C.12 The Government regularly publishes local and regional carbon dioxide emissions national statistics. Territorial carbon dioxide emissions within the scope of influence of Tonbridge and Malling Borough have fallen from 6.9 per capita emissions (tCO₂e) to 4.9 per capita emissions/tCO₂e between 2005 and 2023 [\[See reference 222\]](#) (Table C.1). It is worth noting that of Tonbridge and Malling's neighbouring local authority areas, Medway (2.5tCO₂e), Maidstone (3.5tCO₂e), Gravesham (3.3tCO₂e) and Tunbridge Wells (2.9tCO₂e) perform more favourably in terms of emissions per capita. Sevenoaks (5.2tCO₂e) performs less favourably than Tonbridge and Malling in this regard.

C.13 It should be noted the figures in the below table do not account for large industrial sites, railways, motorways, land-use, livestock and soils.

Table C.1: Territorial carbon dioxide emissions estimates within the scope of influence of Tonbridge and Malling Borough 2005-2023

Year	Total emissions (kt)	Per capita emissions (tCO ₂ e)
2005	1,716.8	15.4
2006	1,672.4	14.7
2007	1,403.5	12.2
2008	1,603.2	13.7
2009	1,471.9	12.4
2010	1,395.9	11.6
2011	1,334.8	11.0
2012	1,344.6	11.0
2013	1,207.4	9.8
2014	1,153.3	9.3
2015	910.9	7.2
2016	949.5	7.5
2017	945.5	7.3
2018	890.3	6.8
2019	772.6	5.9
2020	700.6	5.3
2021	729.0	5.5
2022	690.1	5.2
2023	659.5	4.9

C.14 In Tonbridge and Malling Borough, the domestic and transport sectors have been the main contributors to carbon dioxide emissions. However,

between 2005 and 2023, domestic sector emissions fell from 282.9kt to 147.7kt, a reduction of 135.2kt or 47.8%. Meanwhile, transport sector emissions decreased from 417.8kt to 332.1kt, an 85.7kt reduction, reflecting a 20.5% decrease. This is shown in Table C.2, which shows that emissions have decreased across almost all sectors in Tonbridge and Malling, with the exception of waste, where emissions remained unchanged.

Table C.2: Changes in carbon dioxide emissions (kt CO₂e) by sector for Tonbridge and Malling Borough between 2005 and 2023

Source of emissions	2005	2023
Industry	854.5	130.2
Commercial	136.7	52.9
Public Sector	32.0	13.0
Domestic	282.9	147.7
Transport	417.8	332.1
Agriculture	16.5	9.7
Waste	0.1	0.1
Grand Total	1,716.8	659.5

Overall energy consumption

C.15 The Department for Energy Security and Net Zero produced the following consumption figures for Tonbridge and Malling Borough in 2022. These figures are presented as ktoe (kilotonnes of oil equivalent):

- All fuels – a total of 261.6ktoe across domestic, transport and industrial, commercial and other use.
- Coal – a total of 1.3ktoe predominantly through domestic and industrial use.
- Manufactured fuels – a total of 0.7ktoe across domestic and industrial use.
- Petroleum – a total of 134.5ktoe predominantly from road transport.

- Gas – a total of 69.2ktoe predominantly through domestic use.
- Electricity – a total of 38.7ktoe through domestic, industrial, commercial and other use.
- Bioenergy and wastes – a total of 17.2ktoe predominantly through road transport and industrial and commercial use.

C.16 Table C.3 below highlights the energy consumption for Tonbridge and Malling between 2005 to 2022 by type. During this period, the consumption of coal, manufactured fuels, petroleum, gas and electricity decreased, while energy from bioenergy and wastes was the only category that increased [See reference 223].

Table C.3: Energy consumption in Tonbridge and Malling Borough by type

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

Renewable energy

C.17 Renewable energy is recognised as an important contributor to reducing reliance on fossil fuels and adapting to climate change. Within the South East of England, there was a total of 219,287 sites that were capable of generating renewable energy across wind, solar, wave, hydro and biomass renewable sources in 2023. This represents 14.6% of all the sites within the UK that generate renewable energy. In 2023, the South East of England generated a total of 10,416.4GWh of renewable energy. This is a 92.7% increase in renewable energy generation since 2013.

C.18 In 2022, a total of 2,682 photovoltaic panels and two onshore wind turbines were installed in Tonbridge and Malling. This is an increase on 2014 when 931 photovoltaic panels and one onshore wind turbines were installed [See reference 224]. Renewable electricity produced in Tonbridge and Malling, as at the end of 2023, is detailed in Table C.4 below.

Table C.4: Renewable electricity generation in Tonbridge and Malling in 2023

Type	Number of Sites	Capacity (MW)	Generation (MW)
Photovoltaic	2,682	22.2	19,722
Onshore Wind	2	0	[X] [See reference 225]
Anaerobic Digestion	1	1.3	[X]
Sewage Gas	2	0.7	[X]
Landfill Gas	4	6.2	14,331
Plant Biomass	2	0.2	[X]
Total	2,693	30.6	34,053

C.19 Tonbridge and Malling's Borough Council's Climate Change Strategy commits the borough to becoming carbon neutral by 2030 [See reference 226]. The strategy outlines a commitment to reducing CO₂ emissions across all sectors. The Council seek to reduce emissions from energy consumption in all Council buildings, in-house fleet transport and staff travel. The Carbon Audit produced by Tonbridge and Malling Borough Council reported total gross carbon dioxide equivalent emissions of 3,327.2tCO₂e for the 2023/24 period [See reference 227]. This represents a slight decrease of approximately 2.09% from the 3,398.3tCO₂e recorded in 2022/23 [See reference 228]. The reflects Council attempts to fully embed carbon management within all Council policies and procedures.

C.20 The transport sector contributes significantly to CO₂ levels. Between 2020 and 2021, there was rise in transport greenhouse gas emissions (ktCO₂e) of 6.4%, from 337.3ktCO₂e to 359.0ktCO₂e [See reference 229]. Collaborating

with Kent County Council, Tonbridge and Malling Borough Council aims to tackle this issue by promoting lower carbon and healthy transport choices. The borough is further looking to work towards all taxis becoming Ultra Low Emission Vehicles [\[See reference 230\]](#).

C.21 The Renewable Heat Incentive accreditation is a Government scheme that aims to encourage the uptake of renewable heat technologies amongst householders, communities and businesses through financial incentives. Between April 2014 and October 2019, 100 domestic installations have been accredited in Tonbridge and Malling, which is 8% of Kent and Medway's total. However, the Climate Change Strategy 2020 to 2030 notes that further work is required to accelerate the take up of low emission heating systems [\[See reference 231\]](#).

C.22 Further to this, Tonbridge and Malling are stakeholders in the Kent and Medway Energy and Low Emissions Strategy, and the Council works with Kent County Council to help meet targets outlined in the strategy.

C.23 Tonbridge and Malling Borough Council has outlined the steps it will take to achieve the goals set out in its Climate Change Strategy 2020 to 2030. Progress on the Action Plan for the 2024/2025 period includes [\[See reference 232\]](#):

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

C.24 With regard to solar energy, Tonbridge and Malling Borough Council, in partnership with the 11 other district/borough councils in Kent and Medway Council, is part of the Solar Together Kent scheme. This group-purchase initiative helps householders and small businesses install solar panels and battery storage at competitive prices. Not only can the scheme enable residents to obtain solar panels and battery storage at a lower price but can help lower energy bills and support the borough's ambition to become net zero by 2030 [\[See reference 233\]](#).

C.25 Additionally, in 2023, Tonbridge and Malling Borough Council fitted 190 solar panels at the Larkfield Leisure Centre. Grants totalling more than £1.5 million, including a grant of £1,164,760 awarded by the Public Sector Decarbonising Schemes, and £405,000 by Sport England, will be used to fund energy saving measures at the Larkfield Leisure Centre. This includes through the addition of new solar panels and LED lighting, as well as the installation of air source heat pumps, which will allow for the removal of the current gas fired boilers serving the pool [\[See reference 234\]](#).

Population, health and well-being

Population

C.26 Tonbridge and Malling's population in 2021 was 132,200, which is an 9.4% increase since 2011. This is above the national average of 6% over the same time period [\[See reference 235\]](#). By 2024, the population had increased further to 136,853 (48.6% male and 51.4% female) [\[See reference 236\]](#). Tonbridge and Malling's population increase is higher than the increase for the South East of England (7.7%). In Kent, the largest population increase was in Dartford (19.9%), while the lowest was in Tunbridge Wells (0.3%) [\[See reference 237\]](#).

C.27 Tonbridge and Malling has a population density of 5.6 people per hectare [\[See reference 238\]](#). According to the 2022 mid-year population estimates at ward level, approximately 70% of the total population in Tonbridge and Malling Borough is concentrated in urban areas, while the remaining 30% is distributed across the rural areas. This figure reflects the same spatial distribution across Kent where 73% of people live in urban areas and 27% live in rural areas. This spatial distribution across the borough has remained stable across the 2022 and 2021 mid-year population estimates [\[See reference 239\]](#).

C.28 Over the period 2024 to 2042, the population is projected to increase by 14.4% to 152,859. This value is greater than the wider county-level projection of 13.9% [\[See reference 240\]](#).

C.29 The population of Tonbridge and Malling comprises approximately 65,600 men and 69,600 women. The age distribution of the population in Tonbridge and Malling is similar to the national picture, with the under 15 age group accounting for 18.7% of Tonbridge and Malling's population, compared with 17.2% nationally. The 15 to 64 group accounts for 62% of Tonbridge and Malling's population, which is a similar proportion to the national figure (64.1%). The majority of this percentage is made up of people aged 50-59. The 65 and over age group represents 19.3% of the population of Tonbridge and Malling, compared with 18.7% nationally [\[See reference 241\]](#).

C.30 The old age dependency ratio, defined as the number of people of state pension age per 1,000 people of working age (from 16 years up to state pension age) is also expected to increase within Tonbridge and Malling Borough between 2024 and 2042. In 2021, there were 294.2 people of state pension age per 1,000 people of working age. In 2042, it is predicted that this number will increase by 25.8% to 370.0 people of state pension age per 1,000 people of working age [\[See reference 242\]](#).

C.31 As outlined by the above statistics, there will be a significant increase in the ageing population within Tonbridge and Malling Borough between 2024 and 2042.

C.32 Table C.5 below shows the breakdown of Tonbridge and Malling's population by ethnic group [\[See reference 243\]](#).

Table C.5: Tonbridge and Malling Population by ethnic group (2021)

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

Ethnic group	% of population
Other ethnic groups	0.6

C.33 According to the 2021 Census, there were 55,859 occupied households in Tonbridge and Malling. This means that on average there were 2.5 people living in each household. The distribution of residency and ownership status of homes in Tonbridge and Malling compared to nationally is summarised below:

- 25.6% of households are single-person households compared to a national figure of 30.1%.
- 10.2% of households are lone-parent households; nationally the figure is 11.1%.
- 51.1% of households are comprised of couples; nationally the figure is 45.3%.
- 70% of the population of Tonbridge and Malling own their property outright or with a mortgage or a loan. This means that 70% of Tonbridge and Malling residents are owner-occupiers compared to a figure of 61.3% nationally.
- 12.5% of the Tonbridge and Malling population rent their properties; nationally the figure is 20.5% [\[See reference 244\]](#).

C.34 The population of Tonbridge and Malling is spread across 19 wards. Table C.6 below presents the breakdown of the population distribution in 2022 [\[See reference 245\]](#).

Table C.6: Estimated populations by ward in Tonbridge and Malling Borough in 2022

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

Ward	Population in 2022
Bourne	5,510
Cage Green & Angel	9,080
East and West Peckham, Mereworth & Watlingbury	6,400
East Malling, West Malling & Offham	8,930
Higham	6,020
Hildenborough	5,680
Judd	7,010
Kings Hill	9,810
Larkfield	9,250
Pilgrims with Ightham	5,920
Snodland East & Ham Hill	6,030
Snodland West & Holborough Lakes	5,900
Trench	8,750
Vauxhall	8,750
Walderslade	3,020

Housing

C.35 In 2024, the median average home in England, at £290,000, cost 7.7 times the median average earnings of a full-time employee (£37,600). This is a decrease from 8.4 in 2023. Average house prices increased in 69% of areas compared with 2022, while average earnings increased in 88% of areas [\[See reference 246\]](#). While earnings have doubled since 1997, house prices have more than quadrupled this has led to housing becoming less affordable [\[See reference 247\]](#).

C.36 The 2024 housing affordability ratio [\[See reference 248\]](#) is calculated by dividing house prices by gross annual workplace-based earnings (based on the median and lower quartiles of both house prices and earnings) to give a ratio which serves as an indicator of relative affordability. A higher ratio indicates that on average, it is less affordable for a resident to purchase a house in their local authority district/borough. In the 318 local authorities in England and Wales, housing affordability improved in 237 (75%) local authorities since 2022. Average house prices increased in 69% of local authority districts/boroughs in England and Wales, while average earnings increased in 88% of local authorities in 2023.

C.37 The 2023 housing affordability ratio indicates that Tonbridge and Malling Borough (12.3) is less affordable than surrounding areas of Medway (8.6), Gravesham (9.1), and Maidstone (11.7). However, the borough is more affordable than neighbouring areas of Sevenoaks (14.6) and Tunbridge Wells (12.6). This figure has steadily increased in recent years, rising by 32.3% since 2011 [\[See reference 249\]](#).

C.38 Average house prices across Tonbridge and Malling Borough increased by 23.6% between 2018 and 2024 [\[See reference 250\]](#). According to ONS median residential property prices for administrative geographies data, the median house price (2024) in the borough was £420,000, which is much higher than the English median residential property price of £290,000 [\[See reference 251\]](#).

C.39 The percentage of households in the social rented sector decreased in Tonbridge and Malling, as well as across England. In Tonbridge and Malling, the percentage of households in the social rented sector fell from 16.1% in 2011 to 15.4% in 2021, while across England it fell from 17.7% to 17.1%. During the same period, the regional percentage fell from 13.7% to 13.6%. Private renting in Tonbridge and Malling increased from 10.1% to 12.5%, while the rate of home ownership decreased from 71.1% to 70.0% [\[See reference 252\]](#).

C.40 The updated Housing Land Supply Position for Tonbridge and Malling provides evidence on the potential housing supply across the borough [\[See reference 253\]](#). It identifies an established housing need of 1,096 dwellings per annum. Over the period 2024-2042, this would result in a total housing target of 23,673 dwellings taking into account a 20% buffer. According to the update, Tonbridge and Malling Borough Council has a housing land supply of 2.89 years.

C.41 During the period 2023/24, 458 dwellings (net) were delivered against a cumulative annual target of 839. This represents an under-delivery of 381

homes [\[See reference 254\]](#). In the period between 1 April 2023 and 31 March 2024, 2,214 units were permitted. Of these, 14 were completed, totalling 2,200 units outstanding and 17 demolitions, of which three were completed, resulting in 2,186 net units extant [\[See reference 255\]](#). Housing completions compared with the Tonbridge and Malling Local Plan housing requirement is shown in Table C.7 below [\[See reference 256\]](#).

Table C.7: Housing completions compared with the Tonbridge and Malling Local Plan housing requirement

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

C.42 With regards to affordable housing, Tonbridge and Malling delivered the highest proportion of affordable dwellings in Kent with 41.4% or 156 out of a total of 377 dwellings during 2023/24 [\[See reference 257\]](#).

C.43 As of 2023, the dwelling stock in Tonbridge and Malling stands at 56,446 [\[See reference 258\]](#). This comprises:

- 10 local authority owned (0.02%);
- 8,603 private registered provider (15.24%);

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

C.44 The rate of homelessness on Tonbridge and Malling Borough is 8.9 per 1,000 people, which is lower than in England (13.4) and the South East (11.3).

Gypsies, Travellers and Travelling Showpeople

C.45 During the 2021 Census, 0.3% of the people of Tonbridge and Malling Borough described themselves as White: Gypsy or Irish Traveller, while 0.1% of people described themselves as White: Roma [\[See reference 259\]](#).

C.46 A Gypsy and Traveller and Travelling Showperson Accommodation Assessment (GTAA) was completed in 2022 to establish the need for Gypsy and Traveller and Travelling Showperson accommodation in the borough [\[See reference 260\]](#). The assessment identified an overall need for 41 Gypsy and Traveller pitches across the borough over the period 2021/22 to 2039/40. Of this need, 25 pitches arise from households who meet the Planning Policy for Traveller Sites (PPTS) nomadic habit of life definition and 16 are from households who do not meet the PPTS definition as they no longer lead a nomadic habit of life [\[See reference 261\]](#). The pitch shortfall over the period up to 2039-40 is an annualised cultural need of 2.1 pitches, of which 1.3 pitches are attributed to the PPTS requirement.

C.47 The GTAA notes that the need for pitches has the potential to be met through the regularisation of existing temporary authorised and unauthorised sites and the expansion/intensification of existing sites. There are currently 19 unauthorised pitches and two private temporary authorised pitches. There is also potential for additional pitches on existing sites. There are currently two Travelling Showpersons' yards in Tonbridge and Malling. The previous GTAA evidenced a need for three plots, and it is recommended that this figure remains the projected requirement for new Travelling Showperson plots up to 2040. The GTAA is currently under consideration for review.

Health

C.48 Health is a cross-cutting topic and as such many topic areas explored in this Scoping report influence health either directly or indirectly. In the 2021 Census, 50.7% of the population of Tonbridge and Malling Borough identified

themselves as being in very good health, an increase of 2.7% from 48.0% in 2011. The proportion of Tonbridge and Malling residents describing their health as "very bad" remained 0.9%, while those describing their health as "bad" was 3.2% (similar to 2011). It is important to note that the 2021 Census was conducted during the COVID-19 pandemic and so may have influenced how people perceived and rated their health. Approximately 5.9% of people in Tonbridge and Malling Borough are disabled where their day to day activities are limited a lot [\[See reference 262\]](#).

C.49 Table C.8 below presents health profile highlights for Tonbridge and Malling Borough [\[See reference 263\]](#). Compared to neighbouring authorities and averages for the South East and England, Tonbridge and Malling has a low estimated infant mortality rate, smoking prevalence in adults and under 75 mortality rate from cardiovascular disease. However, Tonbridge and Malling has a higher number of emergency hospital admissions for intentional self-harm than most neighbouring authorities, in addition to the South East and England.

Table C.8: Health profile highlights for Tonbridge and Malling Borough and neighbouring districts/boroughs

Local authority	Infant mortality rate per 1,000 people [See reference 264]	Smoking prevalence in adults (aged 18 and over) (%)	Under 75 mortality rate from cardiovascular disease per 100,000 people	Emergency hospital admissions for intentional self-harm per 100,000 people
Tonbridge and Malling	1.2	3.9	50.4	197.8
Tunbridge Wells	2.1	19.4	60.0	216.7
Gravesham	2.1	15.3	104.6	119.2
Sevenoaks	2.5	5.6	57.9	120.1
Maidstone	3.9	13.4	61.2	227.6

Local authority	Infant mortality rate per 1,000 people [See reference 264]	Smoking prevalence in adults (aged 18 and over) (%)	Under 75 mortality rate from cardiovascular disease per 100,000 people	Emergency hospital admissions for intentional self-harm per 100,000 people
Medway (Unitary Authority)	3.0	12.7	87.7	99.5
South East	3.3	10.6	62.1	125.4
England	4.1	11.6	77.4	117.0

C.50 The rate for alcohol-related harm hospital admissions is 423 per 100,000 people for Tonbridge and Malling, which is better than the average for England (504 admissions per year) [See reference 265].

C.51 Within the Kent and Medway Clinical Commissioning Group (CCG), Tonbridge and Malling Borough is part of the West Kent Integrated Care Partnership (ICP), formerly West Kent CCG. Within the West Kent ICP, there are nine Primary Care Networks (PCNs), four of which overlap with the borough boundary. These PCNs, along with the GP practices they operate within Tonbridge and Malling Borough, are outlined below.

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

C.52 Within the borough, there is Tonbridge Cottage Hospital which operates one large ward and an ambulatory care room. Outside of the borough, Tonbridge and Malling residents utilise services in neighbouring local authorities; Maidstone and Tunbridge Wells NHS Trust provides services at

Maidstone Hospital and Tunbridge Wells Hospital, Pembury. Hospice care is provided at the Hospice in the Weald (Pembury).

C.53 The West Kent CCG Health Needs Assessment [\[See reference 266\]](#) indicated that the demand for service use for general practice, planned care, urgent and emergency care, and social contacts is expected to rise in excess of the total population growth over the next 25 years.

C.54 There are 16 care homes regulated by the Care Quality Commission in the borough [\[See reference 267\]](#). There are also 14 different services offering specialist support for individuals with autism [\[See reference 268\]](#), and numerous different services offering support for individuals with dementia. There are also eight different foodbanks within the borough [\[See reference 269\]](#). The Royal British Legion Industries located in Aylesford, offers a support for Armed Forces Veterans and their families. The organisation has a range of programmes for Armed Forces Veterans and wider support for individuals over 16 for seeking employment, disability support and back to work guidance.

Life expectancy

C.55 As of 2023, the average female life expectancy in Tonbridge and Malling was 84.4 years and the average male life expectancy was 80.7 years. This is above England's average life expectancy of 83.0 years and 79.1 years respectively [\[See reference 270\]](#). A comparison between the life expectancies within Tonbridge and Malling Borough and surrounding local authorities is outlined in Table C.9 below.

Table C.9: Life expectancy within Tonbridge and Malling Borough and neighbouring local authorities (in years)

Local Authority	Male	Female
Tonbridge and Malling	80.7	84.4
Tunbridge Wells	80.7	83.9
Gravesham	78.7	83.4
Sevenoaks	81.7	84.8
Maidstone	80.0	83.7

Local Authority	Male	Female
Medway (Unitary Authority)	78.0	82.1
Kent	79.5	83.3
England	79.1	83.0

Obesity and physical activity levels

C.56 Being overweight or obese carries numerous health risks, including increased likelihood of type 2 diabetes, cancer, heart and liver disease, stroke and related mental health conditions. It is estimated that this places a cost of at least £5.1 billion on the NHS and tens of billions on wider UK society every year.

C.57 Within Tonbridge and Malling, the percentage of adults classified as overweight or obese is 63.3%, which is just below the national average of 63.8%. Further to this, 17.4% of children within Year 6 (aged 10-11 years old) in Tonbridge and Malling are identified as obese, which is well below the national average of 22.65% [\[See reference 271\]](#).

C.58 Reporting by Sport England [\[See reference 272\]](#) shows that:

- 18.9% of adults were classed as 'inactive' with less than 30 minutes of recorded activity a week in November 2022-23. This compares to 22.7% in November 2021-22 and 24.8% in November 2020-21.
- In November 2022-23, 12.5% of adults were reported as fairly active (30-149 minutes of activity) and 68.6 were reported as active (150 minutes or more of activity).

C.59 Within the borough there are four sportsgrounds: Tonbridge Racecourse Sportsground, Tonbridge Farm Sportsground, Frog Bridge Sportsground and Swanmead Sportsground. Across these four sportsgrounds, there are the facilities for baseball, bowling, football, cricket, rugby, crazy golf, tennis, skateboarding and basketball.

C.60 The delivery of many sport and leisure facilities is managed by the Tonbridge and Malling Leisure Trust. The not-for-profit organisation manages six key facilities across the borough: Larkfield Leisure Centre, Angel Centre, Tonbridge Swimming Pool, Poult Wood Golf Course, The Games Hut at Tonbridge Racecourse Sportsground and bookings for sports pitches in

Tonbridge. The Trust also provides for additional specialist needs groups during the week, and offers discounted leisure passes for individuals who are registered as disabled.

Perception of well-being

C.61 Residents of Tonbridge and Malling reported having slightly higher levels of life satisfaction (7.50 out of 10.00) than the UK average (7.45) in the 2022/23 period. Average figures recorded relating to ‘feeling the things done in life are worthwhile’ were higher than the UK (7.93 and 7.73, respectively), while ‘happiness’ in Tonbridge and Malling Borough was marginally higher than the UK (7.57 and 7.39, respectively). Levels of anxiety were recorded at 3.04 for Tonbridge and Malling in this period. This was a decrease of 0.09 from the previous period (2021/2022) [\[See reference 273\]](#).

Open space

C.62 Parks and open spaces are important to the community they serve. They benefit local communities and provide meeting and social spaces, health and well-being, the local economy, community and safety, climate cooling and increasing the appearance and profitability of the area. Open spaces provide opportunities for outdoor exercise and offer the opportunity to help increase levels of health and reduce obesity. They also help to maintain good mental health and reduce stress by encouraging relaxation through interaction with the natural environment.

C.63 There are numerous amenity green spaces and natural green spaces across Tonbridge and Malling Borough. Natural England’s Green Infrastructure (GI) Accessible Greenspace Standards [\[See reference 274\]](#) clarify the quantity, quality and location of green infrastructure required to meet local needs. This standard was used in relation to provision within Tonbridge and Malling, and showed that the majority of Tonbridge and Malling Borough is fully provisioned with greenspace, with only a few areas – particularly north of Watlingbury and the central areas of Tonbridge – where there is no provision of greenspace at doorstep or local levels, and at the neighbourhood level [\[See reference 275\]](#).

C.64 The Old Chalk New Downs project funded by the Heritage Lottery Fund, completed in December 2022, has helped to restore the chalk grassland habitat while also connecting communities to the natural environment. The project has supported works at 33 sites across the project area to restore and/or better manage chalk grassland. Habitat improvement works have included the planting

of 18,000 trees for hedgerows in winter 2021/22, and shrub clearance across a number of sites [\[See reference 276\]](#).

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

C.66 Within the borough there is also Leybourne Lakes Country Park located in Aylesford. The park is approximately 93ha and includes multiple lakes, wildflower meadows and wetlands. There are a range of facilities for visitors of the country park including walking routes and guided trails.

C.67 There are two National Landscapes in the borough. The Kent Downs National Landscape is in the north and a small section of the High Weald National Landscape is in the south.

C.68 Due to being largely rural in nature, Tonbridge and Malling Borough benefits from a dense Public Rights of Way network that provides convenient access from settlements to the wider countryside. This allows access to a wide variety of habitats across the borough which can be beneficial to health and well-being.

Deprivation

C.69 Tonbridge and Malling is ranked 236 out of 317 local authorities for overall deprivation, one being the most deprived and 317 being the least deprived. At the neighbourhood level, Tonbridge and Malling contains 72 Lower Super Output Areas (LSOAs), three of which are within the 20% most deprived areas nationally. These are located within East Malling (003A), Trench (009C) and Aylesford South (005A). The lowest ranking LSOA in the borough (003A in East Malling) falls within the 13% most deprived areas nationally. Generally, Tonbridge and Malling is an affluent area, with 16 of the 72 LSOAs within the 10% least deprived areas nationally. The highest ranking area is Tonbridge and Malling 010B within Hildenborough and is within the 1% least deprived areas nationally, highlighting the range of inequality within the borough [\[See reference 277\]](#).

C.70 The IMD sub-domain 'geographical barriers' measures road distance to amenities, including road distance to primary schools, post offices and GP surgeries. The more rural areas within the borough, including areas surrounding Borough Green and Shipbourne, across to Mereworth and up along the western side of Snodland, are shown to have the lowest proximity to these services, suggesting poor accessibility. There are some pockets of improved accessibility across all indicators in Borough Green, Tonbridge, Snodland and West Malling. Approximately 75% of the borough is characterised by poor accessibility scores across all indicators of geographical barriers. However, geographical proximity provides only a partial picture of overall accessibility, as public transport plays an important role in ensuring everyone has equal access to services and facilities, including for households of lower income or hitting financial difficulty.

C.71 The proportion of rough sleepers in Kent by local authority data has increased by 22.3% in the period 2013 to 2023, from 103 to 126. Kent Analytics reported that in 2023, the number of rough sleepers was 0.2 per 10,000 households, equating to a total of 55 households [\[See reference 278\]](#). Compared to the rest of Kent, the estimated number of rough sleepers in Tonbridge and Malling Borough is lower than ten out of the 12 local authorities [\[See reference 279\]](#).

C.72 According to the Index of Multiple Deprivation, Tonbridge and Malling Borough has experienced the largest increase in deprivation relative to other districts and boroughs in the county [\[See reference 280\]](#). According to a Kent County Council report on Child Poverty from Kent Analytics [\[See reference 281\]](#), there are two districts in the county where there has been an increase in children living in absolute low-income families from 2010/2011 to 2019/2020: Tonbridge and Malling (+4.5%, +115 children) and Tunbridge Wells (+2.5%, +52 children). In total, there are around 9.8% (2,657) children living in absolute low-income families in the borough [\[See reference 282\]](#).

Crime and safety

C.73 The absence of a safe and secure place in which to live can have an extremely negative impact on physical and emotional health and well-being.

C.74 Crime statistics indicate that there is a comparatively lower level of crime in Tonbridge and Malling Borough than the national average.

C.75 There were 8,766 crimes reported in Tonbridge and Malling in the year ending March 2024. This is a 4% decrease when compared to the previous year [\[See reference 283\]](#).

C.76 In March 2023, the ONS Crime Severity Score for total recorded crime in Tonbridge and Malling Borough was 13.0 compared to the national average of 16.4. The offence rate per 1,000 individuals was 60.0, compared to the national average of 93 [\[See reference 284\]](#).

Economy

C.77 Nationally, employment rates continued to increase during 2024. The percentage of people who are economically active (aged 16-64) (85.4%) remains considerably above the national rate (78.5%). The local unemployment rate (2.6%) remains below the national figure (3.9%) [\[See reference 285\]](#). Table C.10 provides data for economic activity and unemployment rates in Tonbridge and Malling compared to the regional and national rates.

Table C.10: Employment and unemployment rates

For April 2024-March 2025	Tonbridge and Malling (%)	South East (%)	Great Britain (%)
Economically active – aged 16-64	85.4	81.1	78.5
Unemployment rate – aged 16-64	2.6	3.3	3.9

C.78 Within Tonbridge and Malling, 70.3% of the economically active population aged 16-64 work full time and 29.7% work part time. In Great Britain, 68.8% work full time and 31.2% work part time.

C.79 In 2022, the total output (Gross Value Added, GVA) in Tonbridge and Malling Borough reached £5,328 million. The trend in GVA has been steadily increasing over the years for the borough [\[See reference 286\]](#).

C.80 The Gross Weekly Pay in 2024 in Tonbridge and Malling for full time workers was £789.50 per week for full time workers which is higher than the regional average (£779.20) and the national average (£729.80). This equates to £41,054 a year in Tonbridge and Malling compared with £40,518 and £37,950 regionally and nationally respectively [\[See reference 287\]](#).

C.81 The UK is currently experiencing a 'cost of living crisis', which refers to the fall in disposable incomes (adjusted for inflation and after taxes and benefits). This began in late 2021, driven by a range of issues from depleted gas supplies

in Europe to semiconductor shortages in Asia. Impacts from the pandemic alongside disruptions to global supply chains also increased prices. The main contribution to these increased prices has been the Russian invasion of Ukraine, which has significantly impacted gas prices as a result of Russia reducing gas sales.

C.82 Since inflation peaked at 11.1 percent in October 2022, it has gradually eased, but recent figures show signs of a modest uptick. A surge in housing and household services costs, especially driven by raised gas and electricity prices following Ofgem’s April 2025 energy price cap increase, has been a major contributor to inflation in recent months. In April 2025, housing and household services inflation stood at 7.0 percent (up from 5.1 percent in March), with prices rising 1.8 percent month-on-month. Transport and recreation & culture also made sizeable upward contributions to CPI inflation, while clothing and footwear exerted a downward effect. For food and non-alcoholic beverages, annual inflation in April reached 3.4 percent, slightly above March’s 3.0 percent. By June 2025, the CPIH annual inflation rate held steady at 4.1 percent, while CPI inflation was around 3.6 percent. Wage growth since summer 2021 has, as before, continued to lag inflation, meaning real incomes remain under pressure.[\[See reference 288\]](#).

C.83 Living costs should be increasing by less than household incomes as inflation rates fall. However, prices will remain high. It will take a long time for household incomes to recover to their previous level in real terms [\[See reference 289\]](#).

C.84 There were an estimated 64,000 jobs in Tonbridge and Malling in 2023 [\[See reference 290\]](#). The proportion of employees in different types of jobs is set out below in Table C.11.

Table C.11: Employee jobs in Tonbridge and Malling Borough in relation to regional and national averages (2023)

Employee Jobs by Industry	Tonbridge and Malling Borough (%)	South East England (%)	Great Britain (%)
Mining and quarrying	0.1	0.0	0.1
Manufacturing	5.5	6.1	7.5

Employee Jobs by Industry	Tonbridge and Malling Borough (%)	South East England (%)	Great Britain (%)
Electricity, gas, steam and air conditioning	0.0	0.3	0.4
Water supply; sewerage, waste management and remediation activities	2.3	0.8	0.7
Construction	7.8	4.9	4.8
Wholesale and retail trade; repair of motor vehicles and motorcycles	17.2	15.0	13.7
Transportation and storage	7.8	4.6	5.0
Accommodation and food service activities	7.0	8.6	8.0
Information and communication	3.5	5.6	4.6
Financial and insurance activities	3.9	2.7	3.4
Real estate activities	2.0	1.7	1.9
Professional, scientific and technical, activities	7.0	9.0	9.3
Administrative and support service activities	10.9	8.0	8.7
Public administration and defence;	4.7	3.5	4.7

Employee Jobs by Industry	Tonbridge and Malling Borough (%)	South East England (%)	Great Britain (%)
compulsory social security			
Education	7.8	9.8	8.6
Human health and social work activities	7.8	14.0	13.9
Arts, entertainment and recreation	2.7	3.0	2.6
Other service activities	1.4	2.2	1.9

C.85 As of 2024, approximately 51.8% of the population of Tonbridge and Malling have a Level 4 qualification and above (degree (BA, BSc), higher degree (MA, PhD, PGCE), NVQ level 4 to 5, Higher National Certificates, Higher National Diplomas, BTEC Higher level, professional qualifications). This is below than the regional figure for the South East of England at 48.2% and the national figure for England at 47.2% [\[See reference 291\]](#).

C.86 Tonbridge and Malling's workforce is distributed across a wide range of sectors, with 56% of the working population employed as a manager, director, senior role, professional occupation or associate professional occupation [\[See reference 292\]](#) compared to the South East of England (55.7%) and Great Britain (53.0%) averages [\[See reference 293\]](#), as displayed in Table C.12.

Table C.12: Employment by occupation (April 2024-March 2025)

Occupation	Tonbridge and Malling	South East	Great Britain
1: Managers, directors and senior officials	21.9%	12.8%	11.1%
2: Professional occupations	27.8%	27.6%	26.8%

Occupation	Tonbridge and Malling	South East	Great Britain
3: Associate professional and technical occupations	# [See reference 294]	15.2%	15.1%
4: Administrative and secretarial occupations	11.1	9.6%	9.2%
5: Skilled trades occupations	10.2	8.6%	8.5%
6: Caring, leisure and other services occupations	#	8.4%	8.6%
7: Sales and customer service occupations	#	5.5%	5.8%
8: Process, plant and machine operatives	#	4.6%	5.6%
9: Elementary occupations	#	7.5%	9.1%

C.87 Data published from the ONS taken from the 2021 Census indicates that 47.4% of the resident population of Tonbridge and Malling travel to work by car or van, which is higher than the national average of 44.5%. According to the 2021 Census, 37% of the resident population in employment work mainly from home, which is higher than the national average of 31.5% [See reference 295].

C.88 In 2024, there were 6,060 businesses in Tonbridge and Malling. The majority of these (88.2% or 5,345) were micro businesses which have fewer than ten staff. There were 565 (9.3%) small businesses, 125 (2.1%) medium and 25 (0.4%) large businesses in Tonbridge and Malling Borough [See reference 296].

C.89 In 2023, Tonbridge and Malling introduced plans for an ambitious economic strategy to support businesses, enhance high streets and boost tourism across the borough [See reference 297]. The Action Plan, contained

with the borough's economic development strategy, [\[See reference 298\]](#) supports the strategy includes initiatives such as:

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

C.90 As of 2025, Tonbridge and Malling Borough Council has begun a major redevelopment of Tonbridge town centre, focusing on Council-owned land and buildings east of the town's high street. The plans include replacement of the Angel Centre, new homes, shops, and a pedestrian town square [\[See reference 299\]](#).

Transport

C.91 Tonbridge and Malling has a well-developed road network that supports connectivity across the borough and surrounding areas. The A228 to A264 road corridor acts as the main spine of the transport network, stretching from Medway towards Tunbridge Wells, and providing access to the M20 and M2 motorways. The M20 also runs through the northern part of Tonbridge and Malling, while the M26 joins the M20 within Tonbridge and Malling, passing through rural areas of the borough. Additionally, the A227 provides a parallel north-south route, from Tonbridge towards Gravesham. Other significant roads, including the A20, A21 and A26, further enhance connectivity, linking towns and villages within the borough while also providing direct routes to London, the South Coast and other parts of Kent.

C.92 However, Tonbridge and Malling's road network faces pressures, particularly due to its proximity to major urban areas like Tunbridge Wells, Maidstone, Paddock Wood and Medway, as well as congestion and delays at junctions within the built-up areas of Tonbridge, Leybourne, Ditton and Aylesford. Schemes have been implemented in some locations across these areas to improve performance of the road network, but the constraints of the built-up area prevent significant changes to the road network. As such, the increasing population will present challenges to reliability and time taken to complete future journeys [\[See reference 300\]](#).

C.93 The borough promotes public transport and walking and cycling routes to help reduce the pressure on the road network from future traffic levels. The 2014-2019 Tonbridge and Malling Cycling Strategy aimed to increase cycle route connectivity from the Tonbridge town centre and station to the surrounding schools and colleges. The strategy aimed to create continuous cycle routes by joining up existing routes and targeting important pathways [See reference 301]. The development of better cycling routes is identified within the Kent County Council's Active Travel Strategy [See reference 302] and the Tonbridge and Malling Cycling Strategy [See reference 303], and the Council is currently working on an Active Travel Strategy [See reference 304]. There has also been the development of the Tonbridge 20mph zone to encourage active modes of travel across the area.

C.94 Cycling infrastructure throughout the borough is generally good, there is a cycle route linking Tonbridge and Penshurst which forms part of the National Cycle Network. A non-motorised unit route, which refers to a pathway designed for pedestrians, cyclists and other non-motorised users links North Farm in Tunbridge Wells and the Vauxhall Roundabout. There is also a recent shared walking/cycling path from Kings Hill to West Malling rail station to improve cycle access for commuters. However, there are some populated areas such as Borough Green and Wrotham which do not have any cycle facilities.

C.95 With regard to rail services, there are nine railway stations with two additional stations along the borough boundary. There are three main railway lines that pass through the borough: the Maidstone Line, the Medway Valley line and the South Eastern Main Line. The closest airport is London Gatwick Airport. Rail services in Tonbridge and Malling are frequent and well-connected. Stations in Tonbridge and Malling on the Maidstone Line, include West Malling and East Malling. These stations provide direct services to London Victoria, Maidstone East and Ashford International. Stations in Tonbridge and Malling on the Medway Valley Line include Snodland, Aylesford and New Hythe. The line primarily offers local services, although connects Strood to Paddock Wood, with onward links to Maidstone and London St Pancras. Tonbridge and Malling railway station has services operated by the South Eastern Main Line, connecting Tonbridge and Malling to London Charing Cross, London Bridge, and Cannon Street. The line also offers connections to surrounding boroughs, including Sevenoaks and Tunbridge Wells, making it a vital transport link for both local and regional travel.

C.96 Most bus routes are operated on a commercial basis; however, some routes are partially funded by Kent County Council. There are regular bus services within the borough as well as services connecting Tonbridge and

Malling Borough to neighbouring towns. However, some smaller bus operators which serve smaller populations, such as Borough Green, do not operate seven days a week.

C.97 The 2021 Census data on method of travel to work reported that a slightly higher percentage (47.4%) of individuals travel by car to work than the national average (44.5%) (Figure C.1). Fewer individuals utilise public transport networks and active modes of transport. The commuting figures (Figure C.2) show that 25.3% of the resident population travel less than 10km to work. There has been a noticeable shift towards working from home during and in the aftermath of the COVID-19 pandemic, with 37.0% of the resident population in employment in Tonbridge and Malling Borough working mainly from home, which is higher than the national average of 31.5% [\[See reference 305\]](#). Additionally, 15.6% of residents in Tonbridge and Malling commute between 10km and 30km, which is slightly higher than the national average of 14.4%. The borough's strong connectivity to neighbouring areas and employment hubs, such as Maidstone, Tunbridge Wells and London, is supported by key routes like the A20, A21 and A228, which provide access to major motorways including the M20 and M2. This well-developed transport network facilitates longer commutes, even though specific destinations are not detailed in the data.

C.98 Based on 2021 Census data, 65,878 Tonbridge and Malling residents work within the borough. This includes 33,610 who work from home and 11,585 who commute locally. Additionally, 20,683 people travel into Tonbridge and Malling for employment, the largest number coming from Maidstone (6,024), followed by Medway (4,483 people) and Tunbridge Wells (2,656 people). In terms of outflow, a total of 19,233 residents travel out of the borough for work. 3,724 residents commute to Maidstone, followed by 3,176 people to Tunbridge Wells and 2,772 people to Sevenoaks for work. This data underscores Tonbridge and Malling's relatively strong local employment base but also the need for a substantial proportion of residents to travel to other locations for work. The borough's good connectivity to employment hubs in areas such as Maidstone, Tunbridge Wells, Colchester and London supports the level of out commuting recorded [\[See reference 306\]](#).

Figure C.1: Method of travel to workplace in Tonbridge and Malling

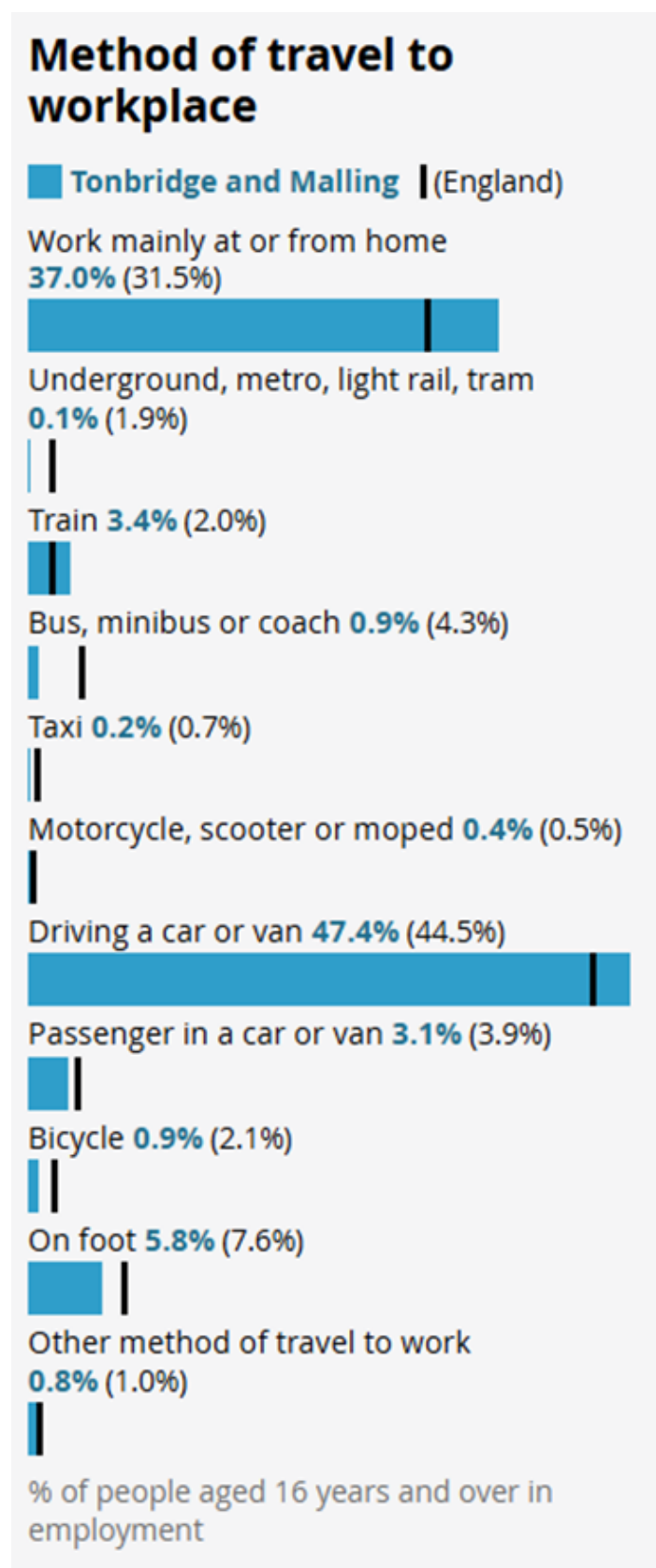


Figure C.2: Distance travelled to work in Tonbridge and Malling Borough



Land and water resources

Geology and minerals

C.99 The soilscape within Tonbridge and Malling Borough has four key varieties. Surrounding the north of Tonbridge, the soil is loamy with high groundwater. To the east of Tonbridge, the soil is freely draining, slightly acidic and loamy, and is also found towards the southern boundary of the borough. The central area of the borough is characterised by two distinct soil types: slightly acidic loamy and clayey soil that is slowly permeable, and slightly acidic loamy and clayey soil that is freely draining.

C.100 The bedrock geology of the borough is characterised by two key bedrock geologies. The northern area of the borough largely comprises Lower Greensand Group, which is sandstone and mudstone. The southern area within the borough largely comprises Wealden Group mudstone, siltstone and

sandstone, with some areas of siltstone and sandstone. The superficial geology of the area is largely within the southern boundary, with some areas of River Terrace deposits of sand and gravel.

C.101 Regionally important geological and geomorphological sites (RIGS) are locally designated sites of regional and local importance for geodiversity. Within the borough, there are nine RIGS identified. These are primarily located in the northern areas of Wealden Greensand and the North Downs. The location of regionally important geological sites is shown within Figure C.3.

C.102 The Kent Minerals and Waste Local Plan 2013-30 [\[See reference 307\]](#) identifies a Strategic Site for Minerals at Medway Cement Works, Holborough, which contains sufficient reserves to meet the at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln. The adopted Tonbridge and Malling Development Plan does not identify any land within or adjacent to the allocated area that constitutes the Strategic Site for Minerals that would conflict with the safeguarding of this site [\[See reference 308\]](#).

Water

C.103 There are several aquifers concentrated around Aylesford and Snodland which are used for abstractions for public water supply. There are over 100 licensed abstraction points. The borough's drinking water is supplied by South East Water [\[See reference 309\]](#). As a portion of the drinking water is abstracted from the groundwater, the Environment Agency has outlined Source Protection Zones (SPZs) to safeguard public drinking water sources from contamination. SPZs are defined around large and public potable groundwater abstraction sites and they provide additional protection to safeguard drinking water quality by constraining the proximity of an activity that can impact the quality of drinking water. The borough's SPZs include large areas of Zone 3, to the north of the borough, particularly around West Malling and Snodland, where groundwater is abstracted for public water supply [\[See reference 310\]](#).

C.104 Tonbridge and Malling Borough is within the Medway Management Catchment, and more specifically the Medway Middle Operational Catchment. The River Medway flows through the borough from Tonbridge town centre in a north-easterly direction and is fed by several small rivers and streams. The other main surface water feature is the River Bourne which flows from the vicinity of Borough Green southwards towards East Peckham [\[See reference 311\]](#).

C.105 In 2013, the Tonbridge and Malling Stage 1 Surface Water Management Plan identified the main rivers within the borough [\[See reference 312\]](#). Main rivers are identified by the Environment Agency and are usually larger rivers or streams where the Environment Agency carries out maintenance, improvement or construction work to manage flood risk.

C.106 There are 12 main rivers within the borough across two Catchment Flood Management Plans: (1) the North Kent Rivers; and (2) the Medway. These main rivers are listed below, and their spatial extent is illustrated on Figure C.4:

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

C.107 In 2022, across the Medway Middle Operational Catchment, the majority of water bodies were classified as being of 'Moderate' ecological status or potential status, with no water bodies classified as 'Good' or 'High'. Further to this, in 2019, all the surface water bodies in this operational catchment were classified as 'Fail' for the chemical status [\[See reference 313\]](#). In 2022, the surface water bodies were not assessed. This is due to the fact the priority substances and other specific pollutants are not discharged in significant enough quantities into the respective waterbodies [\[See reference 314\]](#).

C.108 Groundwater vulnerability maps identify how vulnerable groundwater sources are to pollution according to hydrological, geological, hydrogeological and soil properties in the vicinity. The 2017 Groundwater Vulnerability Maps published by the Environment Agency indicate that the groundwater surrounding Tonbridge town centre is a combination of high to medium/high

vulnerability. There are further areas of this high level of vulnerability towards the north of the borough around West Malling and Borough Green. The central area of the borough is characterised by low and unproductive groundwater classification [\[See reference 315\]](#).

C.109 Southern Water is responsible for The River Medway Catchment Drainage and Wastewater Management Plan. This involves the management of sewerage catchments and associated pollution incidents. Some of the more northerly areas of the borough are managed by Thames Water.

Flood risk

C.110 Although flood risk is centred around and caused through water environment features, the net effect of flooding can be argued to be mainly on people and where they live and work, affecting homes, communities and infrastructure. One of its main effects is on health, whether this is the safety of residents and others, physical injury (or even death) or lost access to healthcare and emergency services, or people's mental health due to the impacts and recovery from flooding.

C.111 Flood risk is a cross-cutting theme as well in terms of how it affects the natural environment and the economy and is exacerbated by climate change.

C.112 While most of Tonbridge and Malling Borough falls within Flood Zone 1 (0.1% annual probability of flooding), there are several areas which are within Flood Zones 2 (0.1% to 1% annual probability of flooding) and 3 (more than 1% annual probability of flooding), which means there is a high probability of flooding from rivers and the sea. The areas of Flood Zone 3 are located on land adjacent to the River Medway and its associated tributaries. This high flood risk encapsulates urban areas within Tonbridge and Malling Borough, including the town of Tonbridge in the south and the Medway Gap and Snodland in the north [\[See reference 316\]](#). In the borough, there are a total of 5,171 dwellings in areas considered to be at risk from tidal or fluvial flooding, of which 2,784 are at a medium-high risk of flooding. Notably, East Peckham has 612 dwellings at risk, Aylesford has 488, and Tonbridge has 475 [\[See reference 317\]](#).

C.113 Surface water flooding also poses a significant risk across the borough, alongside the threat of fluvial flooding. Additionally, the River Medway, north of Allington Lock, is susceptible to tidal flooding, further increasing flood risk in the area.

C.114 The flood risk zones in Tonbridge and Malling Borough are shown in Figure C.5.

C.115 There are a number of flood alleviation schemes throughout the borough. The Leigh Flood Storage Area (FSA) was completed in 1982 and is situated between the villages of Leigh and Penshurst in Kent. When full, it covers approximately 278 hectares. It is formed of a 1.3 kilometre long, five metre high earth embankment across the Medway Valley. The Leigh FSA is of particular importance to Tonbridge and Malling as the River Medway represents the greatest flood risk in the borough, particularly in the southern areas. The Environment Agency is responsible for maintaining and operating the Leigh FSA. Between spring 2021 and December 2022, the Environment Agency carried out works to maintain the Leigh FSA. These works will ensure that the storage area continues to safely reduce flood risk to Tonbridge and Hildenborough in the future and should also reduce the risk of flooding further downstream in East Peckham [\[See reference 318\]](#).

C.116 Additional schemes in the borough include the Leigh expansion and Hildenborough embankment scheme, which began construction in spring 2024, and is expected to be fully operational by the end of 2025. The scheme seeks to reduce the risk of flooding for more homes in the area through increasing the capacity of the Leigh FSA and constructing a new embankment to protect homes in Hildenborough [\[See reference 319\]](#).

C.117 The climate in Tonbridge and Malling is expected to change, presenting a series of risks for the borough. Climate change is estimated to result in milder wetter winters and increased summer rainfall intensity. This combination will increase the pressure on existing sewer systems effectively reducing their design standard, leading to more frequent flooding.

Air quality

C.118 Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children, the elderly and those with existing heart and lung conditions. There is also often a strong correlation with equalities issues because areas with poor air quality are also often less affluent areas. Air pollution is the largest environmental risk to public health in the UK [\[See reference 320\]](#). Poor air quality is associated with approximately 28,000 and 36,000 deaths a year nationally. It is estimated that nationally, the total cost for the NHS and social

care system will be £1.6 billion between 2017 and 2025 for air pollutants (fine particulate matter and nitrogen dioxide) [\[See reference 321\]](#).

C.119 The Tonbridge and Malling Borough Air Quality Annual Status Report [\[See reference 322\]](#) indicates that the main source of air pollution within the borough is NO₂, generated as a result of road traffic from main A roads and the M20. Consequently, five Air Quality Management Areas (AQMA) have been declared, relating to emissions from motor vehicles.

C.120 These AQMA are outlined below and illustrated in Figure C.6:

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

C.121 The main pollutant of concern in the borough continues to be nitrogen dioxide (NO₂). In 2024, all AQMA in Tonbridge and Malling remained below the annual mean objective of 40µg/m³, with most locations showing only slight year-on-year reductions of between 1–2µg/m³. Watlingbury (AQMA 4) remains the only AQMA within 10% of the limit, as it was in 2023, though concentrations there have stabilised. Borough Green AQMA recorded a 2µg/m³ increase, likely linked to temporary roadworks and queuing traffic.

C.122 Following the revocation of AQMA 1 (M20) in August 2024, Tonbridge & Malling Borough Council will now seek councillor approval in 2025 to revoke the remaining AQMA at Tonbridge High Street (AQMA 3), Aylesford (AQMA 5), Larkfield (AQMA 6) and Borough Green (AQMA 7), as these all meet the criteria for revocation under TG(22). Watlingbury (AQMA 4) will be retained given its proximity to the objective.

C.123 To ensure local compliance, some diffusion tube sites will be repositioned in 2025 to confirm that air pollution levels do not present renewed concern before potential removal in 2026.

Soils

C.124 The Agricultural Land Classification [\[See reference 323\]](#) provides a framework for classifying land according to the extent to which its physical or chemical characteristics impose long-term limitations to agricultural use. The

principal factors influencing agricultural production are soil wetness, drought and erosion. These factors, together with interactions between them, form the basis for classifying land use into one of five grades, where 1 describes land as excellent (land of high agricultural quality and potential) and 5 describes land as very poor (land of low agricultural quality and potential). Land falling outside these scores is deemed to be 'primarily in non-agricultural use', or 'predominantly in urban use'. Grade 3 can be further separated into grades 3a and 3b, although this requires further local surveys and therefore such data is only available for small areas. Grades 1, 2 and 3a are considered to be the best and most versatile agricultural land.

C.125 According to Agricultural Land Classification Grades – Post 1988 published by Natural England and most recently updated in 2024 [\[See reference 324\]](#), most of the agricultural land in Tonbridge and Malling Borough is classified as Grade 3 – 'Good to Moderate'. There are also some areas of Grade 2 'Very Good' with small areas of Grade 1 'Excellent' agricultural land around West Malling, Borough Green and Watlingtonbury.

C.126 The Council has a duty to prepare, maintain and publish a Brownfield Land Register. This register is a list of previously developed sites that are under construction for residential development, have planning permission for residential development or may be suitable for residential development. As of 2019, there are a total of 26 sites on the Brownfield Register [\[See reference 325\]](#). However, not all of these sites are deliverable and nor have they been granted planning permission.

Contaminated land

C.127 Under Part IIA of the Environmental Protection Act 1990, Tonbridge and Malling Borough Council is responsible for regulating contaminated land. This requires surveying Tonbridge and Malling Borough, determining contaminated land, ensuring a solution is found, and identifying who should bear the costs of the solution.

C.128 In accordance with Section 78R of the Environmental Protection Act 1990, the Council is also required to maintain a public register of contaminated land, which serves as a permanent record of all regulatory action undertaken to ensure remediation of any site that has been classified as contaminated. There are currently no entries on the public register.

C.129 The definition of contaminated land from Part IIA Environmental Protection Act 1990 (as amended), Section 78A is: "...any land which appears

to the local authority in whose area it is situated to be in such a condition, by reason of substances in, on or under the land, that:

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

C.130 Local authorities are required to take a strategic approach in inspecting their area and are required to publish this as a part of a written strategy. A guide for development on potentially contaminated land for Tonbridge and Malling was published in 2004, with the most recent revision in 2016. The purpose of this guide is to provide developers, planning agents and other applicants with details of the information required by local authorities for sites that may be affected by land contamination or for when sensitive end uses are introduced to a site [\[See reference 326\]](#).

C.131 The 2016 Tonbridge and Malling Borough Council Contaminated Land Strategy states that previous desk-based studies identified approximately 600 potential areas of contaminated land from sites of current or former industrial, commercial, or other use. These sites are primarily located around the industrial areas of Tonbridge, Snodland and Aylesford.

C.132 There are multiple current and historic landfill sites within the borough. Current landfill sites are defined as permitted waste sites that are currently authorised by the Environment Agency under the Environmental Permitting Regulations. Historic landfill sites are sites where there is no environmental permit in force. There are 15 current landfill sites and 54 historic landfill sites within the borough, as illustrated in Figure C.7 [\[See reference 327\]](#).

Waste

C.133 The Minerals and Waste Local Development Framework is the responsibility of Kent County Council. Minerals Consultation Areas cover the Minerals Safeguarding Areas, with additional areas to ensure that consultation takes place between county and district/borough planning authorities.

C.134 There are 48 sites listed under the Kent County Council registered minerals and waste sites in Tonbridge and Malling Borough. Kent County Council Kent Minerals and Local Plan 2013-2030 [\[See reference 328\]](#) outlines measures to be taken to achieve the objective of ensuring that as much waste as possible is recycled. Throughout the plan period, the spatial vision for minerals and waste in Kent is that minerals and waste development will make a

positive and sustainable contribution to the Kent area and assist with progression towards a low carbon economy [\[See reference 329\]](#).

C.135 The five year review of the Minerals and Waste Local Development Framework by Kent County Council demonstrated a cumulative annual increase in consented capacity across all waste streams. By 2020, there were over two million tonnes per annum of additional capacity across all waste streams [\[See reference 330\]](#).

C.136 There are 32 recycling sites located across Tonbridge and Malling Borough. Between 2023 to 2024, a total of 51,397 tonnes of waste was collected in the borough, of which 51,378 tonnes consisted of household waste. Of this household waste, 48.2% was sent to be recycled, composted or re-used, resulting in 51.8% of waste not being recycled. This is higher than the regional average recycling rate of 46.2% for the South East of England and the national recycling rate of 42.3% for England [\[See reference 331\]](#).

C.137 Tonbridge and Malling's high recycling rate is largely due to a significant reduction in waste sent to landfill, driven by the recent opening of Kent Enviropower (Energy from Waste) facility in Allington [\[See reference 332\]](#). The Council aims to increase the level of household waste which is recycled, composted or re-used to 54% in 2025/26, in addition to reducing the overall mass of waste through minimisation of packaging. Notably, the Council already achieved a 52% recycling rate in 2024/25, demonstrating steady progress towards its target [\[See reference 333\]](#).

C.138 There is one household waste recycling centre located in Tonbridge and Malling Borough: Allington Household Waste Recycling Centre. There are some other household waste recycling centres located in the neighbouring boroughs of Sevenoaks, Tunbridge Wells, Medway and Maidstone.

Biodiversity and geodiversity

C.139 Tonbridge and Malling has a number of sites designated for their environmental sensitivity. This includes two Special Areas of Conservation (SAC) within the northern area of the borough, North Downs Woodland SAC and Peters Pit SAC. SACs are protected areas in the UK, designated under the Conservation of Habitats and Species Regulations 2017 to conserve habitats and species considered to be most in need. North Downs Woodland is approximately 287 hectares in size; however, only part of this SAC is within the borough. Peters Pit is the second SAC within the borough and is much smaller with an area of 28.3 hectares.

C.140 There are 11 Sites of Special Scientific Interest (SSSIs) wholly or within the borough, the largest of which are Halling to Trottiscliffe Escarpment (600.6 hectares in total) and Holborough to Burham Marshes (149.8 hectares in total). Peters Pit SAC is also a SSSI [\[See reference 334\]](#).

C.141 There are currently 47 Local Wildlife Sites (LWSs) in the borough, the largest of which is Mereworth Woods in the middle of the borough [\[See reference 335\]](#). Within the borough, there are two Local Nature Reserves (LNRs): Ditton Court Quarry Nature Reserve located towards Ditton in the north-east of the borough and Haysden Nature Reserve which includes Barden and Haysden Lakes, located in the south-west of the borough [\[See reference 336\]](#).

C.142 The international, national and local designated sites within the borough are outlined below, along with their Natural England citations where appropriate. The location of these sites is shown in Figure C.8. Note that Local Wildlife Sites are not listed below as there are a large number of these designations and it is more useful to refer to the map.

C.143 The borough also contains numerous habitats and species of principal importance (priority habitats), which include deciduous woodland, lowland dry acid grassland and traditional orchards. Defra's list of habitats and species of principal importance in England includes these priority habitats.

European Sites within Tonbridge and Malling Borough

North Downs Woodland SAC

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

Peters Pit SAC

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

National Sites within Tonbridge and Malling Borough

Wouldham to Delting Escarpment SSSI

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

Wateringbury SSSI

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

Trottiscliffe Meadows SSSI

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

Peter's Pit SSSI

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

One Tree Hill and Bitchet Common SSSI

- Location: West (north of Shipbourne)

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

Oldbury and Seal Chart SSSI

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

Houlder and Monarch Hills Pits, Upper Halling SSSI

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

Holborough to Burham Marshes SSSI

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

Halling to Trottiscliffe Escarpment SSSI

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

Bourne Alder Carr SSSI

- Location: West (south of Borough Green)

- **Qualifying Features:** The site is a representative example of Wealden valley alderwood, with a rich flora including several locally distributed plants.

Aylesford Pit SSSI

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

Local Nature Reserves within Tonbridge and Malling Borough

Ditton Quarry LNR

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

Haysden LNR

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

Historic environment

C.144 The built heritage and historic landscapes of Tonbridge and Malling are an important element in providing a sense of place and civic pride for residents and visitors.

C.145 In terms of key assets in the historic environment, Tonbridge and Malling has:

- 60 conservation areas;
- 1,318 listed buildings;
- 25 scheduled monuments; and

- 5 registered parks and gardens.

C.146 Across the borough there are 60 conservation areas; these are buildings, spaces and landscapes which contribute to the area's architectural and historic character. These areas are protected under additional legislation, therefore any future development within proximity of or within these areas is subject to additional planning controls [\[See reference 337\]](#).

C.147 Some heritage assets, non-designated heritage assets, archaeological sites, historic buildings, parks, formal gardens or battlefields, are considered to be of national importance. Non-designated heritage assets include a list of local heritage assets that do not meet the strict criteria for national designation but are of local importance.

C.148 The designated heritage assets within Tonbridge and Malling Borough can be seen in Figure C.9.

Heritage at risk

C.149 Historic England has a Heritage at Risk Register [\[See reference 338\]](#) which includes historic buildings, sites and conservation areas at risk of being lost through neglect, deterioration or decay. The register aims to highlight those places and buildings in greatest need of repair.

C.150 Within the borough, four heritage assets were identified on the Historic England Heritage at Risk Register [\[See reference 339\]](#). The condition of these assets ranges between 'poor' to 'extensive significant problems'.

C.151 The heritage assets on Historic England's Heritage at Risk Register and their condition are set out below:

- **Church of All Saints, Snodland:** Grade I; Condition – Poor.
- **Town Banks, Tonbridge:** Scheduled Monument; Condition – Generally unsatisfactory with major localised problems.
- **Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles, Aylesford:** Scheduled Monument; Condition – Extensive significant problems.
- **Chapel of St Blaise, Offham:** Scheduled Monument; Condition – Generally unsatisfactory with major localised problems.

Landscape

C.152 National Character Area (NCA) profiles created by Natural England are used to define the specific combination of landscape, geodiversity, biodiversity, history, culture and economic activity in the area. NCAs follow natural lines in the landscape instead of administrative boundaries.

C.153 There are four NCAs within the borough: High Weald, Low Weald, Wealden Greensand and North Downs [\[See reference 340\]](#).

C.154 Two National Landscapes designated by Natural England partially fall within the borough boundary. The Kent Downs National Landscape is situated along the northern and western boundaries of the borough, and there is a small area of the High Weald National Landscape in the south of the borough. Both National Landscapes have Management Plans adopted by the Council. Combined, the National Landscapes constitute approximately 26% of the borough [\[See reference 341\]](#). Figure C.10 shows the location of the National Landscapes within the borough.

C.155 The Landscape Character Assessment 2020 of the Kent Downs National Landscape [\[See reference 342\]](#) identifies six key landscape character types within the National Landscape. These are:

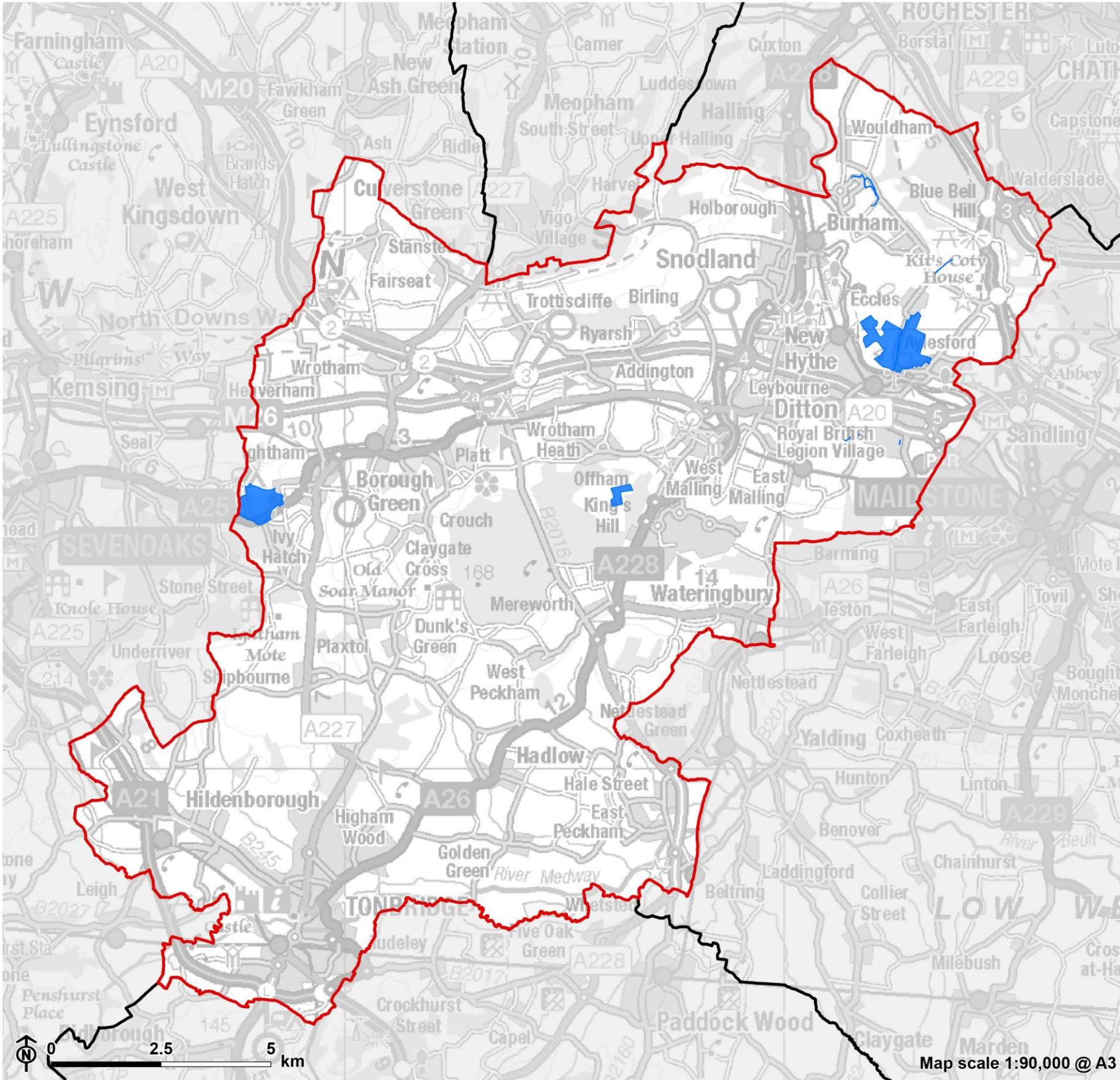
- LCT 1: Chalk Downs
- LCT 2: Chalk Scarps and Vales
- LCT 3: Chalk Cliffs and Coast
- LCT 4: River Valleys
- LCT 5: Greensand
- LCT 6: Low Weald

C.156 Across the National Landscape, landscape management is generally positive. There have been a number of landscape enhancement initiatives, including Higher Level Stewardship schemes, projects to revert arable land to grassland, extensive woodland management projects, community orchard projects, and landscape enhancement schemes (such as hedgerow and woodland planting) as mitigation/compensation for High Speed 1. There is, however, increased pressure from development outside the National Landscape, which has impacts on the landscape such as increased light pollution, traffic and recreation pressure, with impacts on tranquillity.

C.157 Approximately 11% of the borough is covered by Ancient Woodland, equating to 2,621 hectares. The 2012 Kent Habitat Survey recorded the condition and extent of natural habitats in Tonbridge and Malling Borough. The survey reported that Tonbridge and Malling Borough land cover was largely characterised by grassland, arable land and built development, and this land cover composition had remained relatively stable since 1990 [\[See reference 343\]](#). The Landscape Assessment of Kent outlines that the borough is classified into 32 LCAs as shown on Figure C.11.

C.158 Approximately 71.1% of the borough is covered by the Metropolitan Green Belt [\[See reference 344\]](#). Figure C.12 illustrates the extent of the borough designated as Green Belt.

Figure C.3: Regionally Important Geological Sites



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Figure C.3: Regionally Important Geological Sites

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

Figure C.4: Main rivers



Figure C.4: Main rivers

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

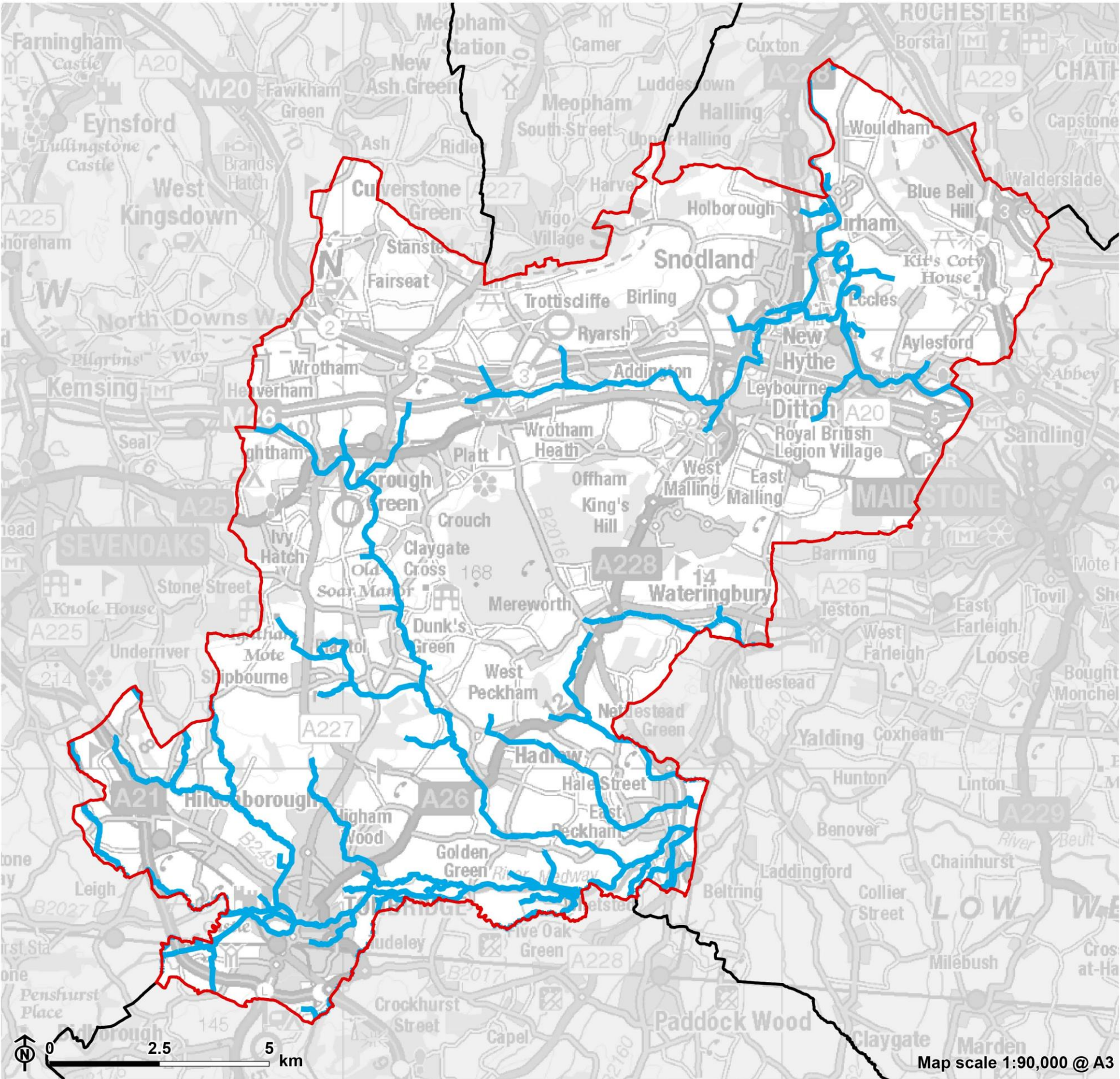
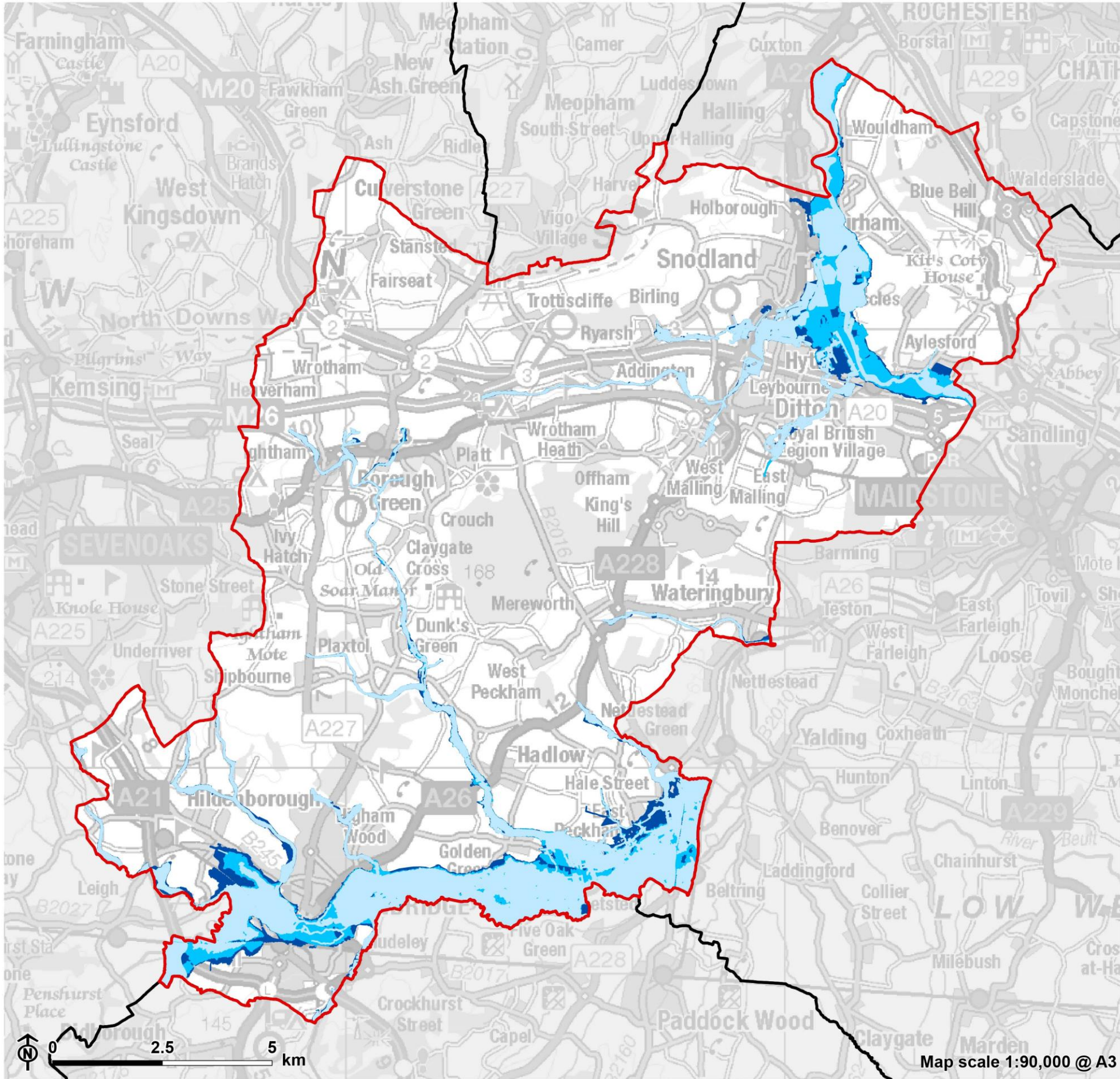


Figure C.5: Flood risk zones



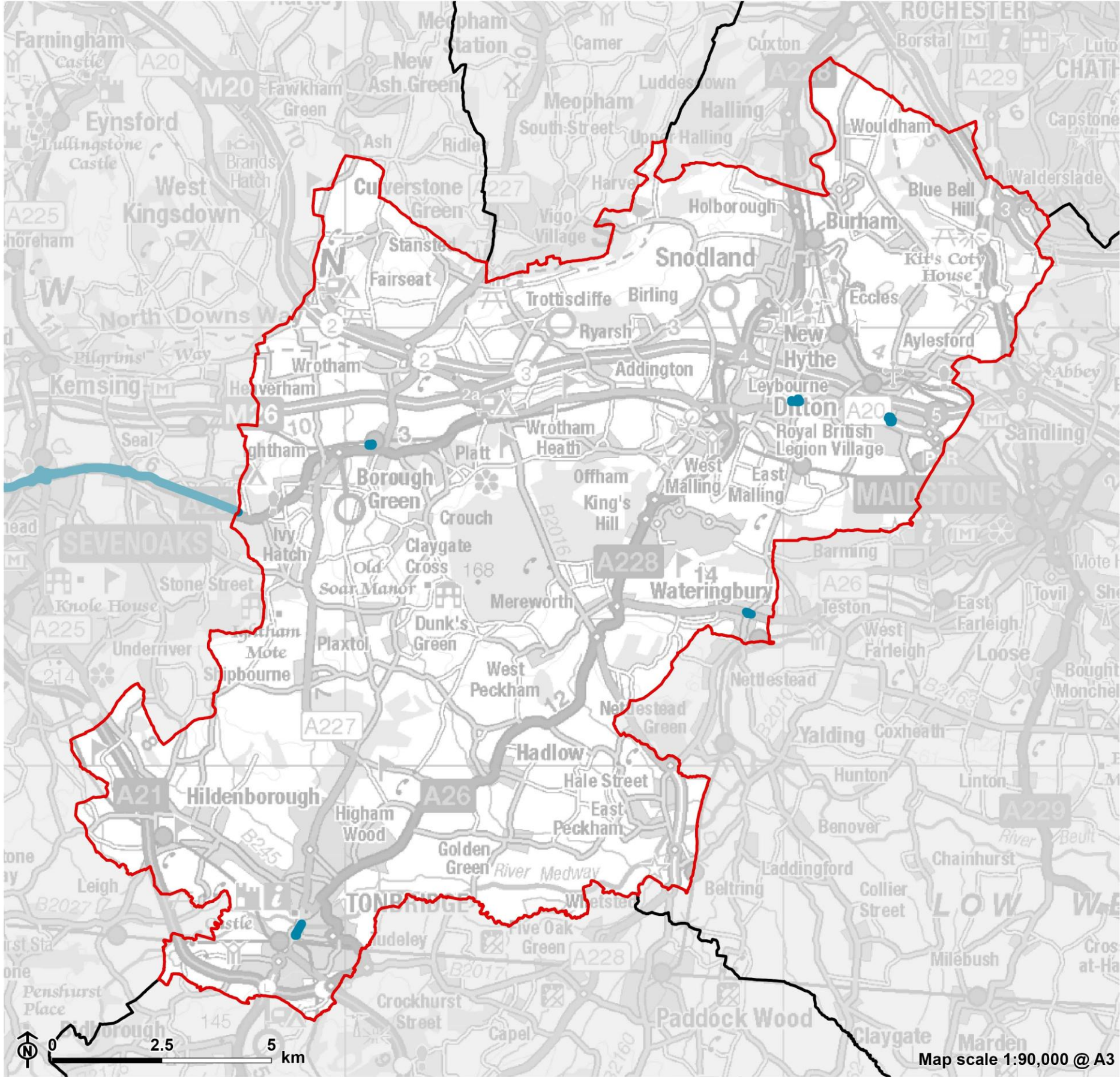
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Figure C.5: Flood risk zones

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

Figure C.6: Air Quality Management Areas



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Figure C.6: Air Quality Management Areas

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

Figure C.7: Landfill sites

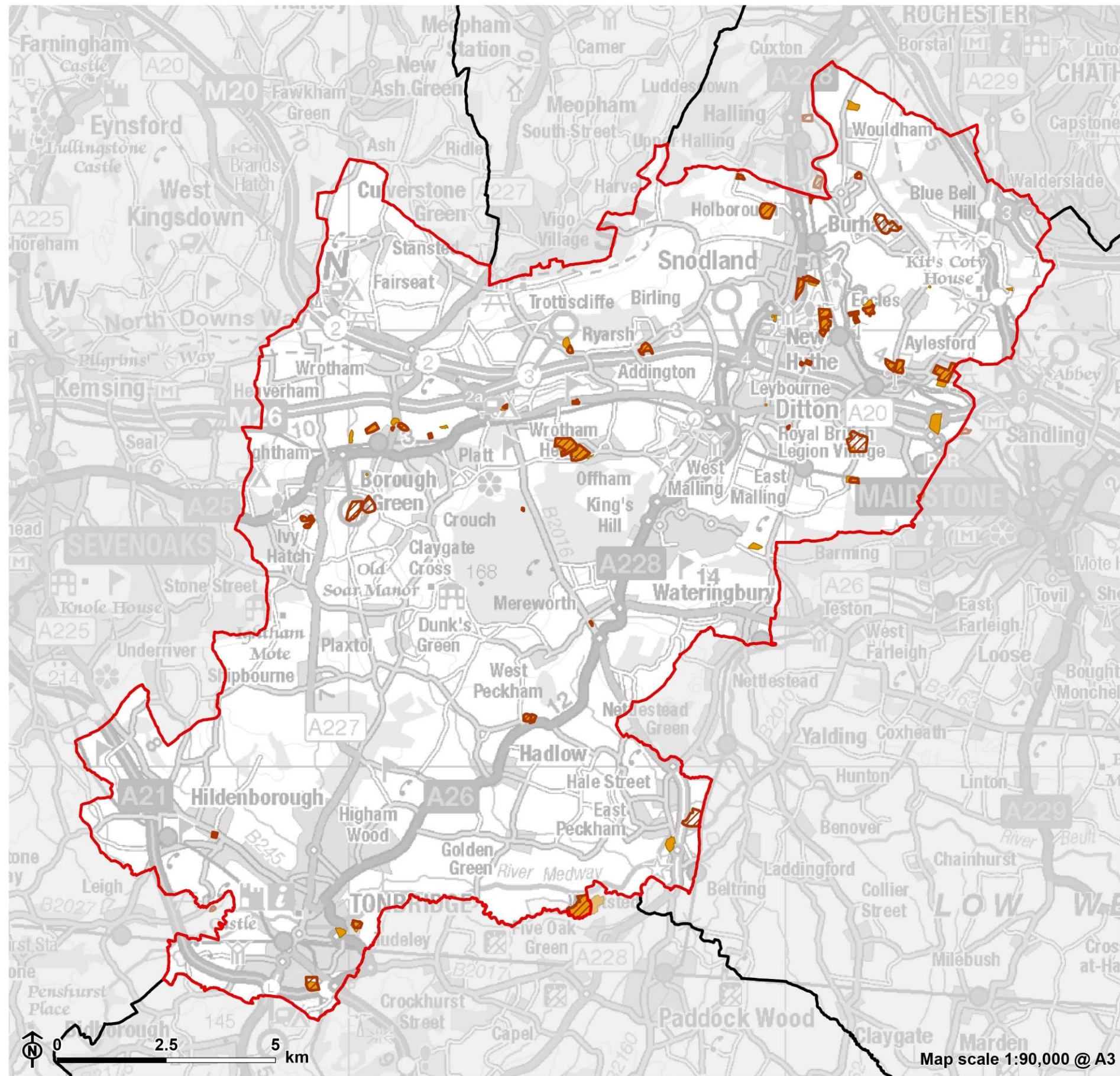
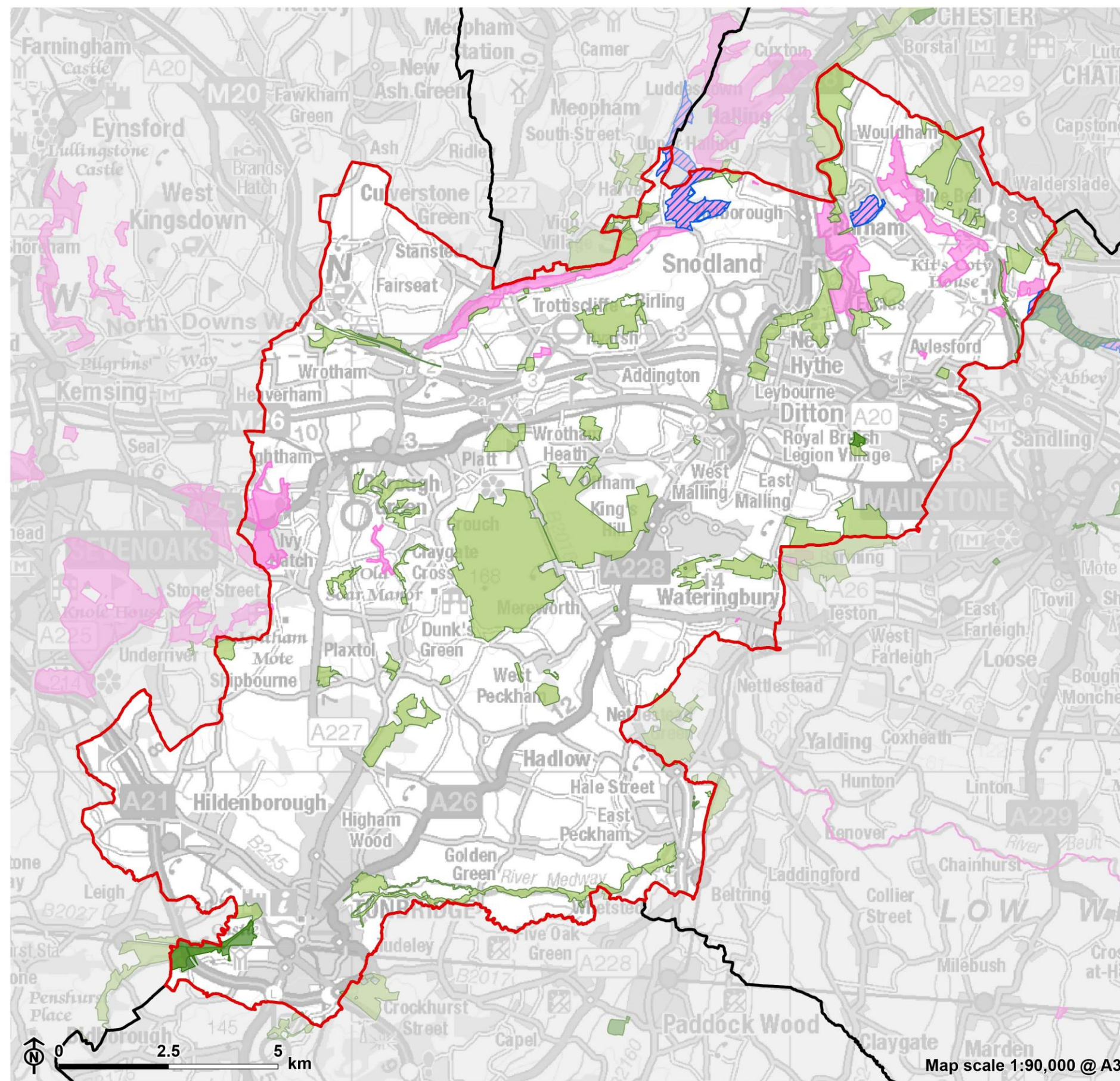


Figure C.7: Landfill sites

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

Figure C.8: Biodiversity and geodiversity assets



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Figure C.8: Biodiversity and geodiversity assets

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

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Figure C.9: Heritage assets



Figure C.9: Heritage assets

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

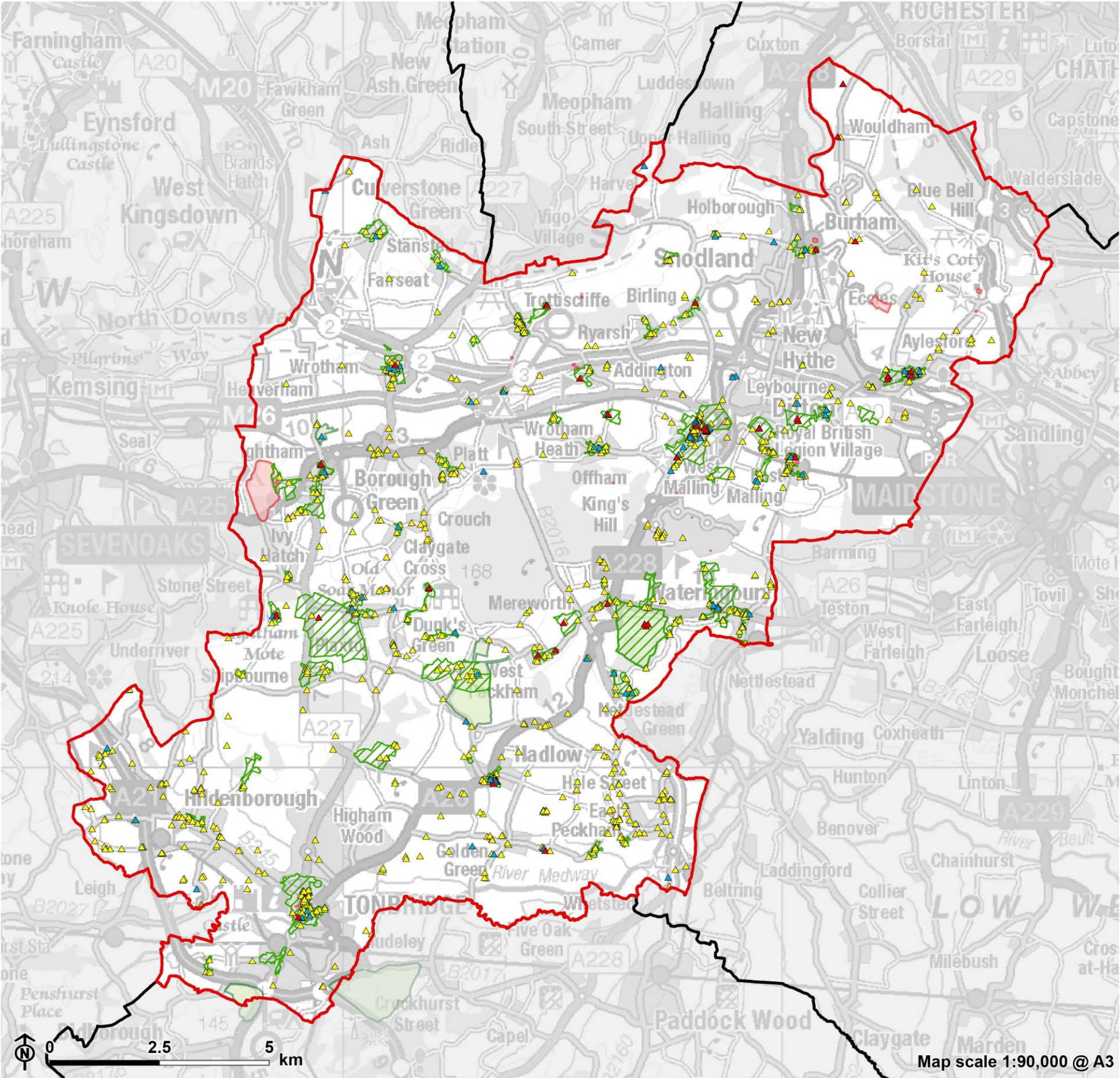


Figure C.10: National Landscapes



Figure C.10: Location of National Landscapes

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

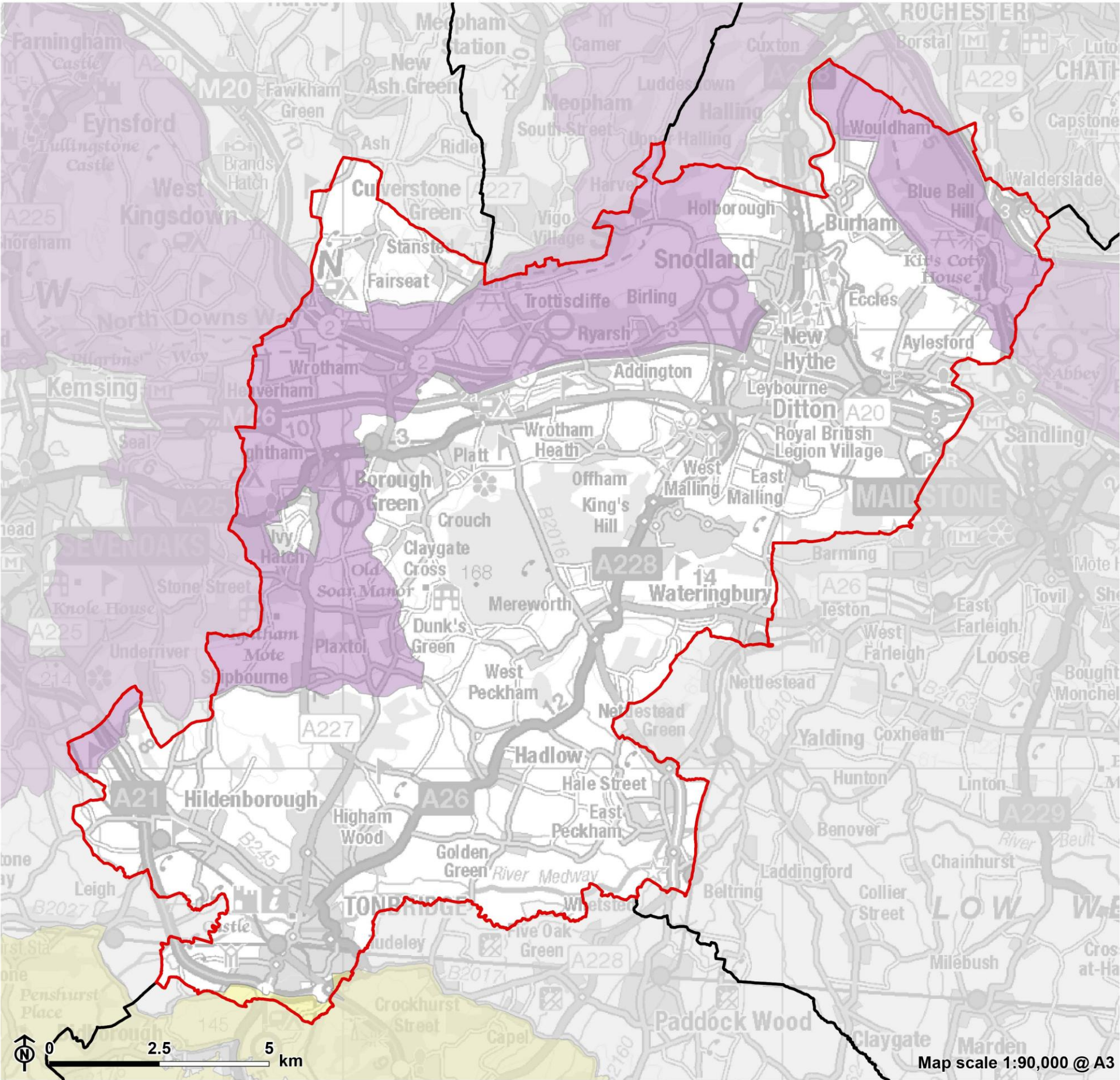
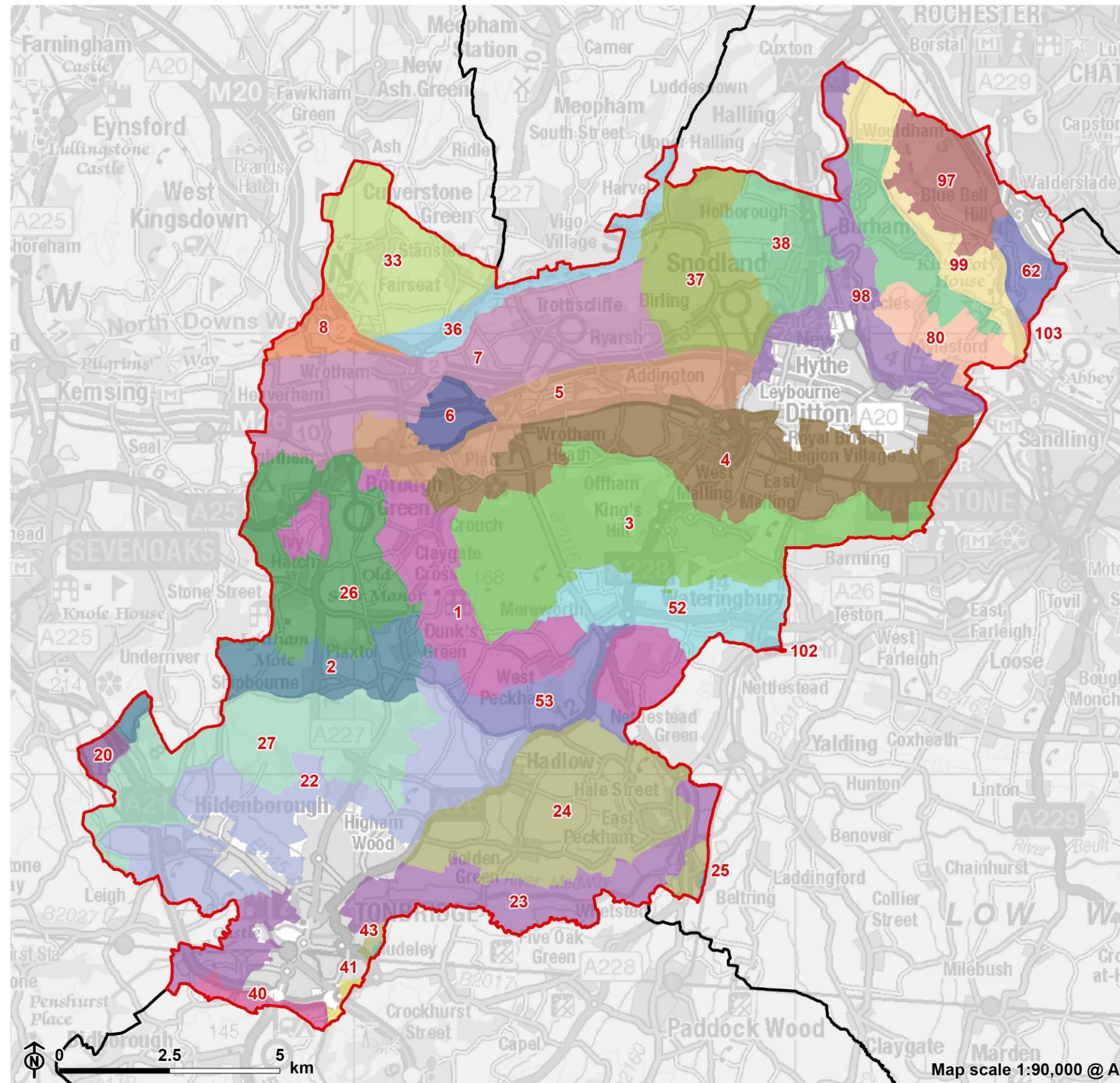


Figure C.11: Kent Landscape Character Areas in Tonbridge and Malling Borough



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Figure C.11: Kent Landscape Character Areas in Tonbridge and Malling Borough

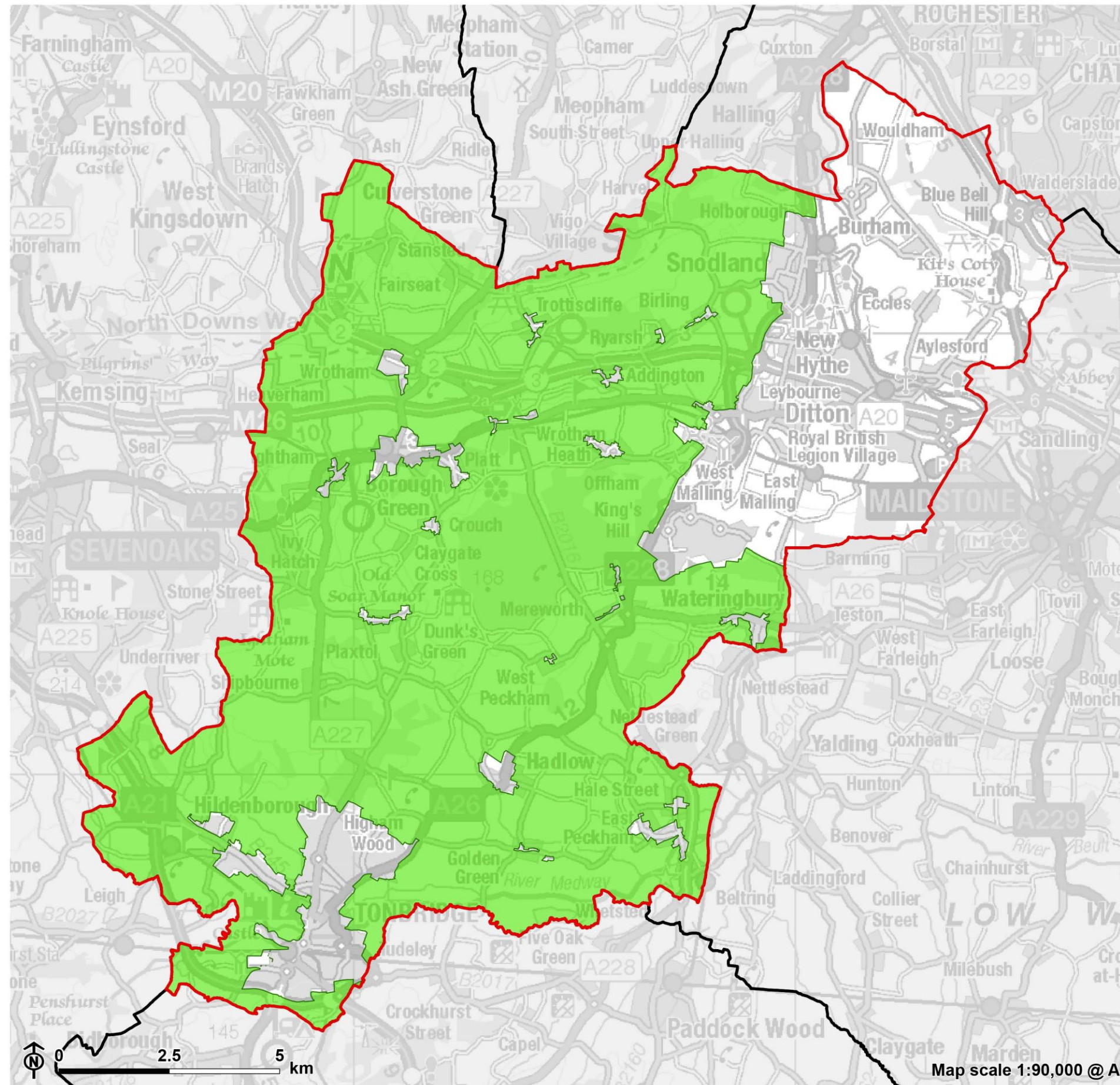
-  Tonbridge and Malling boundary

 Neighbouring local authority

Landscape Character Area

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

Figure C.12: Green Belt coverage



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Tonbridge and Malling Borough Council



Figure C.12: Green Belt coverage

-  Tonbridge and Malling boundary
 Neighbouring local authority
 Green Belt

Appendix D

Site assessment criteria

D.1 Reasonable alternative site options for the residential, employment and mixed use sites to be allocated in the Local Plan will be identified by TMBC. These sites will be appraised against the site assessment criteria set out in this chapter. Some changes were made to the site assessment criteria in response to comments received from statutory consultees during the Scoping consultation (see Appendix B).

D.2 The GIS-based approach to site appraisals means that where a site is found to have a negative effect, this may be as a result of only a small part of that site falling within the relevant constraint being considered.

D.3 This approach, which will be carried forward into the forthcoming SA of site options, will ensure that the SA still highlights potential adverse effects and flags these for closer examination of the potential for avoidance or mitigation of negative effects by the Council before allocation.

D.4 At the end of this chapter, the site assessment criteria is presented in table format.

Assumptions regarding distances

D.5 A number of the appraisal assumptions presented in this document refer to accessibility from site options to services, facilities, employment, etc. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Chartered Institution of Highways and Transportation found that the average length of a walk journey is one kilometre. The Chartered Institution of Highways and Transportation categorises distances depending upon location and purpose of the trip as 'desirable', 'acceptable' and 'preferred maximum':

- Town centres:
 - Desirable – 200m
 - Acceptable – 400m
 - Preferred maximum – 800m
- Commuting/school/sightseeing:
 - Desirable – 500m

- Acceptable – 1,000m
- Preferred maximum – 2,000m
- Elsewhere:
 - Desirable – 400m
 - Acceptable – 800m
 - Preferred maximum – 1,200m

D.6 It is important to note that some of the issues addressed by the SA objectives are cross cutting and could be relevant to more than one of the SA objectives and associated assessment criteria listed below. Therefore, to avoid repetition they are only addressed under the most relevant SA objective. Furthermore, not all of the sub-objectives listed in the SA framework are measurable, and therefore assumptions have only been included where effects can be measured and appraised spatially, as set out below.

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

Residential and mixed use site options

D.7 Residential sites and mixed use sites incorporating residential development that are within close proximity of existing healthcare facilities (e.g. GP surgeries) will ensure that residents have good access to healthcare services. If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded; however, it is also recognised that new development could stimulate the provision of new healthcare facilities although this cannot be assumed at this stage.

D.8 Public health will also be influenced by the proximity of residential and mixed use sites to open spaces, walking and cycle paths, play areas, recreation and sports facilities, easy access to which can encourage participation in active outdoor recreation. Employees working within mixed-use sites may also be more able to commute via active modes and make use of open spaces during breaks. As with healthcare facilities, new development could potentially stimulate the provision of new spaces and facilities for active recreation; however, this cannot be assumed at this stage. Therefore:

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

D.9 If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++)/--?) or (+/--?) effect.

Employment site options

D.10 It is assumed that people would make use of healthcare facilities near to their homes rather than their workplaces. However, proximity to open spaces, walking and cycle paths, recreation and sports facilities will provide employees access to these types of features around their working hours and access to walking and cycle routes may present opportunities to travel to work using active travel. Therefore:

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

D.11 The effects of all new development (residential, employment and mixed-use) on safety, including levels of crime and fear of crime, will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the policies in the new Local Plan and detailed proposals for each site).

D.12 If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility, it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (+/--?) effect.

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

Residential and mixed use site options

D.13 The location of residential sites, as well as mixed use sites incorporating residential development, could affect this objective by influencing people's ability to access existing services and facilities, although it is noted that larger scale development could potentially incorporate the provision of new services. Tonbridge including Hilden Park is the main town within the borough and is the main focus of services and facilities but other settlements also offer a range of services and facilities at varying levels.

- Sites within or adjacent to (i.e. less than or equal to 100m) a Principal Service Centre or Service Centre will have a significant positive (++) effect;
- Sites within or adjacent to a Primary Village will have a minor positive (+) effect;
- Sites within or adjacent to a Secondary Village will have a negligible (0) effect; and
- Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.

Employment site options

D.14 The location of employment sites to community facilities and services is relevant as people may make use of the facilities and services near to their workplaces around working hours. Therefore:

- Sites within or adjacent to (i.e. less than or equal to 100m) a Principal Service Centre or Service Centre will have a significant positive (++) effect;

- Sites within or adjacent to a Primary Village will have a minor positive (+) effect;
- Sites within or adjacent to a Secondary Village will have a negligible (0) effect; and
- Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.

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

Residential and mixed use site options

D.15 The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage.

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

Employment site options

D.16 The location of employment sites is not considered likely to affect this objective.

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

Residential site options

D.17 The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore, a negligible (0) effect is expected for these site options. However, if a site contains an existing business that could be lost as a result of residential development, a minor negative (-) effect is expected. It is acknowledged that some sites may contain existing businesses that have not been identified within the Call for Sites form.

Mixed use and employment site options

D.18 All of the mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the creation of more new jobs and so would have significant positive effects. It is assumed that all mixed use site options will incorporate some element of employment generating uses and could therefore affect the employment opportunities element of this objective. Employment generated from site options is likely to benefit the highest number of residents where sites are accessible by sustainable transport links. Therefore:

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

D.19 In addition, which could lead to mixed effects overall:

- Sites that are within 800m of a train station are likely to have a significant positive (++) effect;
- Sites that are within 400m of a bus stop and/or cycle path (but that are more than 800m from a train station) are likely to have a minor positive (+) effect; and

- Sites that are not within 800m of a train station or within 400m of a bus stop or cycle path are likely to have a negligible (0) effect.

SA objective 5: To protect and enhance biodiversity and geodiversity

Residential, mixed use and employment site options

D.20 Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.

- Sites that are within 250m of one or more internationally or nationally designated [\[See reference 345\]](#) biodiversity or geodiversity sites, or that contain a locally designated site, Ancient Woodland or Priority Habitat, may have a significant negative (--?) effect;
- Sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or that are within 250m of (but do not contain) a locally designated [\[See reference 346\]](#) site, Ancient Woodland or Priority Habitat, may have a minor negative (-?) effect; and
- Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a locally designated site, Ancient Woodland or Priority Habitat, could have a negligible (0?) effect.

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

Residential, mixed use and employment site options

D.21 All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. However, the actual effect on landscapes and townscape will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Therefore, all negative effects are recorded as uncertain.

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

D.22 In addition, proximity to the Kent Downs and High Weald National Landscape can provide an indication of the potential for development to have adverse impacts on those designated landscapes.

D.23 Sites that are within 1km of the National Landscape, including within the National Landscape, could have a significant negative (--?) effect.

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

Residential, mixed use and employment site options

D.24 Development sites that are within close proximity of a heritage asset have the potential to affect their setting and contribution to the local character and distinctiveness. Heritage assets comprise conservation areas, listed buildings, scheduled monuments and registered parks and gardens. Effects are uncertain at this stage as they will depend on factors such as the design of the

development and whether there are lines of sight between the development site and nearby heritage assets.

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

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

Residential, mixed use and employment site options

D.25 The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed based on the location of the sites. Where site options are located in areas of high flood risk, without mitigation, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. Therefore:

- Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding will have a significant negative (--) effect;
- Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding will have a minor negative (-) effect; and
- All other site options will have a negligible (0) effect on the assumption that flood risk could be avoided.

D.26 Levels of water consumption within new development will be determined by sustainable design principles and on-site practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses and water bodies and Source Protection Zones. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design,

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

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

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

Residential, mixed use and employment site options

D.27 Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites. Where development takes place on previously developed land, land of agricultural value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.

D.28 Consideration is given to both the Provisional Agricultural Land Classification (ALC) and the Post 1988 ALC. The Post 1988 ALC only covers specific areas of the borough and so supersedes the Provision ALC in these specific areas only. Where a site comprises around half brownfield land and half greenfield land, mixed effects will apply.

- Greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3a agricultural land will have a significant negative (--) effect;
- In some areas, it is unknown whether a site comprises Grade 3a (high quality) and/or 3b (not classed as high quality) agricultural land. Therefore, greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 3

agricultural land where it is not specified whether it is Grade 3a or 3b agricultural land, will have an uncertain significant negative (--?) effect;

- Greenfield sites that either contain no or less than a significant proportion (<25%) of Grade 1, 2 and/or 3 (3a and 3b) agricultural land will have a minor negative (-) effect; and
- Sites that are located on brownfield land will have a significant positive (++) effect.

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

Residential, mixed use and employment site options

D.29 The proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, however, whether or not these are delivered are currently uncertain.

D.30 It is considered that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to cycle will depend on factors such as the availability of cycle storage facilities at their end destination and physical ability to cycle, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site.

- Sites that are within 800m of a railway station are likely to have a significant positive (++) effect;
- Sites that are more than 800m from a railway station but within 400m of a bus stop are likely to have a minor positive (+) effect;

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

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

Residential, mixed use and employment site options

D.31 The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. As such, this objective has been scoped out of the site appraisal work.

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

Residential, mixed use and employment site options

D.32 Development sites that are within, or very close to, the Air Quality Management Areas (AQMA) that have been declared in Tonbridge and Malling, could increase levels of air pollution as a result of increased vehicle traffic. Therefore:

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

SA objective 13: To protect material assets and minimise waste

Residential, mixed use and employment site options

D.33 All new development will likely result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources. Therefore:

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

D.34 The location of development will not affect the other sub-objectives of this objective as effects will largely depend on the detailed proposals for sites and their design, the construction techniques and the actual use of the sites, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage.

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

Residential site options

D.35 All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings.

Mixed use site options

D.36 For mixed use sites that will incorporate residential development, the likely effects will be as described above for residential sites; however, the positive effects will be uncertain (++?) and (+?) depending on how much of the site is used for residential development as opposed to other uses.

Employment site options

D.37 The location of employment sites is not considered likely to affect this objective; therefore, the effect for all employment site options will be negligible (0).

Table D.1: Site assessment criteria in table format

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

SA objective	Site assessment criteria
	features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++) or (+/-?) effect. Employment site options It is assumed that people would make use of healthcare facilities near to their homes rather than their workplaces. However, proximity to open spaces, walking and cycle paths, recreation and sports facilities will provide employees access to these types of features around their working hours and access to walking and cycle routes may present opportunities to travel to work using active travel. Therefore: ■ Sites that are within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor positive (+) effect; and ■ Sites that are not within 800m of an existing area of open space/sports facility or walking/cycle path will have a minor negative (-) effect. The effects of all new development (residential, employment and mixed-use) on safety, including levels of crime and fear of crime, will depend on factors such as the incorporation of green space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the policies in the new Local Plan and detailed proposals for each site). If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility, it is recognised that that this use may be lost as a result of development. As such where site options contain such features a potential significant negative (--?) effect is recorded. This will mean some sites may be recorded as having an overall mixed (++) effect.
	Residential and mixed use site options

SA objective	Site assessment criteria
SA objective 2: To improve equality and access to community facilities and services	The location of residential sites, as well as mixed use sites incorporating residential development, could affect this objective by influencing people's ability to access existing services and facilities, although it is noted that larger scale development could potentially incorporate the provision of new services. Tonbridge including Hilden Park is the main town within the borough and is the main focus of services and facilities but other settlements also offer a range of services and facilities at varying levels. ■ Sites within or adjacent to (i.e. less than or equal to 100m) a Principal Service Centre or Service Centre will have a significant positive (++) effect; ■ Sites within or adjacent to a Primary Village will have a minor positive (+) effect; ■ Sites within or adjacent to a Secondary Village will have a negligible (0) effect; and ■ Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.
	Employment site options
	The location of employment sites to community facilities and services is relevant as people may make use of the facilities and services near to their workplaces around working hours. Therefore: ■ Sites within or adjacent to (i.e. less than or equal to 100m) a Principal Service Centre or Service Centre will have a significant positive (++) effect; ■ Sites within or adjacent to a Primary Village will have a minor positive (+) effect; ■ Sites within or adjacent to a Secondary Village will have a negligible (0) effect; and ■ Sites that are not within or adjacent to a settlement will have a minor negative (-) effect.
	Residential and mixed use site options

SA objective	Site assessment criteria
SA objective 3: To ensure access to education facilities and support skills and training development for all age groups and all sectors of society	The effects of sites on this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage. ■ Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school will have an uncertain significant positive (++) effect; ■ Sites that are within 800m of an existing primary school and 1,000m of an existing secondary school (but not both) will have an uncertain minor positive (+?) effect; and ■ Sites that are more than 800m of an existing primary school and more than 1,000m of an existing secondary school will have an uncertain minor negative (-?) effect.
	Employment site options
	The location of employment sites is not considered likely to affect this objective.
SA objective 4: To encourage sustainable economic growth, business development, high levels of employment and economic	Residential site options
	The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore, a negligible (0) effect is expected for these site options. However, if a site contains an existing business that could be lost as a result of residential development, a minor negative (-) effect is expected. It is acknowledged that some sites may contain existing businesses that have not been identified within the Call for Sites form.
	Mixed use and employment site options

SA objective	Site assessment criteria
inclusion across the borough	All of the mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the creation of more new jobs and so would have significant positive effects. It is assumed that all mixed use site options will incorporate some element of employment generating uses and could therefore affect the employment opportunities element of this objective. Employment generated from site options is likely to benefit the highest number of residents where sites are accessible by sustainable transport links. Therefore: ■ Sites that include employment development more than 5ha in size will have a significant positive (++) effect; and ■ Sites that include employment development smaller than 5ha in size will have a minor positive (+) effect. In addition, which could lead to mixed effects overall: ■ Sites that are within 800m of a train station are likely to have a significant positive (++) effect; ■ Sites that are within 400m of a bus stop and/or cycle path (but that are more than 800m from a train station) are likely to have a minor positive (+) effect; and ■ Sites that are not within 800m of a train station or within 400m of a bus stop or cycle path are likely to have a negligible (0) effect.
SA objective 5: To protect and enhance biodiversity and geodiversity	Residential, mixed use and employment site options Development sites that are within close proximity of an international, national or locally designated biodiversity or geodiversity site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial

SA objective	Site assessment criteria
	effects. In addition, the potential impacts on biodiversity and geodiversity present on each site, or undesignated habitats and species adjacent to the potential development sites, cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application. ■ Sites that are within 250m of one or more internationally or nationally designated [See reference 347] biodiversity or geodiversity sites, or that contain a locally designated site, Ancient Woodland or Priority Habitat, may have a significant negative (--?) effect; ■ Sites that are between 250m and 1km of one or more internationally or nationally designated biodiversity or geodiversity sites, or that are within 250m of (but do not contain) a locally designated [See reference 348] site, Ancient Woodland or Priority Habitat, may have a minor negative (-?) effect; and ■ Sites that are more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or that are over 250m from a locally designated site, Ancient Woodland or Priority Habitat, could have a negligible (0?) effect.
SA objective 6: To protect and enhance the borough's landscape and townscape character and quality	Residential, mixed use and employment site options All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. Site options adjacent to the existing urban edge could be more easily integrated into existing built development, compared to more rural and isolated sites. However, the actual effect on landscapes and townscapes will also depend on the design, scale and layout of development, which may help mitigate any adverse effects. Therefore, all negative effects are recorded as uncertain. ■ Sites that are located within a settlement will have a negligible (0) effect; ■ Sites located entirely or mainly on the edge of a settlement will have an uncertain minor negative (-?) effect; and

SA objective	Site assessment criteria
	■ All sites located entirely or mainly outside of settlements in rural locations, and/or would result in the loss of designated open spaces will have an uncertain significant negative (--?) effect. In addition, proximity to the Kent Downs and High Weald National Landscape can provide an indication of the potential for development to have adverse impacts on those designated landscapes. Sites that are within 1km of the National Landscape, including within the National Landscape, could have a significant negative (--?) effect.
SA objective 7: To protect, conserve and enhance heritage and cultural assets	Residential, mixed use and employment site options Development sites that are within close proximity of a heritage asset have the potential to affect their setting and contribution to the local character and distinctiveness. Heritage assets comprise conservation areas, listed buildings, scheduled monuments and registered parks and gardens. Effects are uncertain at this stage as they will depend on factors such as the design of the development and whether there are lines of sight between the development site and nearby heritage assets. ■ Sites that are located within 250m of a heritage asset may have a significant negative (--?) effect. ■ Sites that are located between 250m-1km of a heritage asset may have a minor negative (-?) effect. ■ Sites that are more than 1km from a heritage asset may have a negligible (0?) effect.
SA objective 8: To protect and enhance the water environment and reduce flood risk	Residential, mixed use and employment site options The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates sustainable drainage systems (SuDS), which is unknown and cannot be addressed based on the location of the sites. Where site options are located in areas of high flood risk, without mitigation, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. Therefore:

SA objective	Site assessment criteria
	■ Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 3 and/or within an area with a 1 in 30 year risk of surface water flooding will have a significant negative (--) effect; ■ Site options that are entirely or significantly (i.e. $\geq 25\%$) within Flood Zone 2 and/or contain land with a 1 in 100 year risk of surface water flooding will have a minor negative (-) effect; and ■ All other site options will have a negligible (0) effect on the assumption that flood risk could be avoided. Levels of water consumption within new development will be determined by sustainable design principles and onsite practices, rather than the location of the site. However, the location of development could affect water quality during construction depending on its proximity to watercourses and water bodies and Source Protection Zones. The extent to which water quality is affected would depend on construction techniques and the use of SuDS within the design, therefore effects are uncertain at this stage. Therefore, this could result in mixed effects overall: ■ Development on sites which contain a water body or watercourse or fall within or partially within a Source Protection Zone 1 could result in significant negative (--?) effects on water quality although this is uncertain at this stage of assessment; ■ Development on sites which do not contain a water body or watercourse but fall within or partially within Source Protection Zones 2 and 3 could result in minor negative effects (-?) on water quality although this is uncertain at this stage of assessment; and ■ Development on sites which do not contain a water body or watercourse and do not fall even partially within a Source Protection Zone would have a negligible (0) effect.
SA objective 9: To conserve and enhance soil resources, use land efficiently and	Residential, mixed use and employment site options Development on brownfield land represents more efficient use of land in comparison to the development of greenfield sites. Where development takes place on previously developed land, land of agricultural value is less likely to be lost and there may be opportunities to reuse onsite buildings and materials, thereby reducing waste generation.

SA objective	Site assessment criteria
guard against land contamination	Consideration is given to both the Provisional Agricultural Land Classification (ALC) and the Post 1988 ALC. The Post 1988 ALC only covers specific areas of the borough and so supersedes the Provision ALC in these specific areas only. Where a site comprises around half brownfield land and half greenfield land, mixed effects will apply. ■ Greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 1, 2 and/or 3a agricultural land will have a significant negative (--) effect; ■ In some areas, it is unknown whether a site comprises Grade 3a (high quality) and/or 3b (not classed as high quality) agricultural land. Therefore, greenfield sites that contain a significant proportion ($\geq 25\%$) of Grade 3 agricultural land where it is not specified whether it is Grade 3a or 3b agricultural land, will have an uncertain significant negative (--?) effect; ■ Greenfield sites that either contain no or less than a significant proportion ($< 25\%$) of Grade 1, 2 and/or 3 (3a and 3b) agricultural land will have a minor negative (-) effect; and ■ Sites that are located on brownfield land will have a significant positive (++) effect.
SA objective 10: To reduce greenhouse gas emissions to help tackle the climate emergency and contribute to becoming a net zero carbon borough	Residential, mixed use and employment site options The proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, however, whether or not these are delivered are currently uncertain. It is considered that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to cycle will depend on factors such as the availability of cycle storage facilities at their end destination and physical ability to cycle, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of

SA objective	Site assessment criteria
	site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. ■ Sites that are within 800m of a railway station are likely to have a significant positive (++) effect; ■ Sites that are more than 800m from a railway station but within 400m of a bus stop are likely to have a minor positive (+) effect; ■ Sites that are more than 800m from a railway station and more than 400m from a bus stop but which have a cycle path within 400m are likely to have a negligible (0) effect; and ■ Sites that are more than 800m from a railway station and more than 400m from a bus stop and cycle route could have a minor negative (-) effect.
SA objective 11: To reduce vulnerability to the adverse effects of climate change through adaptation	Residential, mixed use and employment site options The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. As such, this objective has been scoped out of the site appraisal work.
SA objective 12: To reduce levels of and exposure to noise, light and air pollution	Residential, mixed use and employment site options Development sites that are within, or very close to, the Air Quality Management Areas (AQMA) that have been declared in Tonbridge and Malling, could increase levels of air pollution as a result of increased vehicle traffic. Therefore: ■ Site options that are within 100m of an AQMA (including within the AQMA) are likely to have a significant negative (--) effect; and ■ Site options that are not within 100m of an AQMA are likely to have a negligible (0) effect on air quality.

SA objective	Site assessment criteria
SA objective 13: To protect material assets and minimise waste	Residential, mixed use and employment site options
	All new development will likely result in the increased consumption of minerals for construction but this will not be influenced by the location of the development. The location of development sites can influence the efficient use of minerals as development in Minerals Safeguarding Areas may sterilise mineral resources and restrict the availability of resources. Therefore: ■ Sites that fall within a Minerals Safeguarding Area could have a minor negative (-?) effect although this is uncertain; and ■ Sites that do not fall within a Minerals Safeguarding Area are expected to have a negligible (0) effect. The location of development will not affect the other sub-objectives of this objective as effects will largely depend on the detailed proposals for sites and their design, the construction techniques and the actual use of the sites, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage.
SA objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures to meet local needs	Residential site options
	All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by the Local Plan. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, including affordable housing, as well as making a greater contribution towards local housing needs. A significant positive (++) effect is therefore recorded for residential sites of 100 dwellings or more. A minor positive (+) effect is recorded for site options that would provide fewer than 100 dwellings. Mixed use site options

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

References

- 1 The Planning and Compulsory Purchase Act 2004 was amended under the Environmental Assessments and Miscellaneous Planning (EU Exit) Regulations 2018
- 2 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI2018/1232)
- 3 Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2021) Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>
- 4 The Conservation of Habitats and Species Regulations 2017 (SI 2017/1012), as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579)
- 5 The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No. 1633) as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531)
- 6 No neighbourhood plans have been progressed yet in the borough but three applications for neighbourhood areas have been made for: Ditton Neighbourhood Area, West Malling Neighbourhood Area and Hildenborough Neighbourhood Area.
- 7 Ministry of Housing, Communities and Local Government (2024) National Planning Policy Framework [online] Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- 8 HM Government (2004) Planning and Compulsory Purchase Act 2004 (as amended) – Clause 19(2)(A) [online] Available at: <https://www.legislation.gov.uk/ukpga/2004/5/section/19>
- 9 Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government (2016, updated 2024) Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

- 10 Homes England (2020) Building for a Healthy Life [online] Available at: https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf
- 11 The updated PPG clarifies that this requirement of the NPPF is to be applied “where most of the development arising from larger scale developments proposed in the plan will be delivered well beyond the plan period, and where delivery of those developments extends 30 years or longer from the start of the plan period”. Furthermore, where this requirement applies “the authority will need to ensure that their vision reflects the long-term nature of their strategy for the plan or those larger scale developments. It is not anticipated that such visions would require evidence in addition to that already produced to support the plan.”
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- 345** Special Areas of Conservation, Sites of Special Scientific Interest and Regionally Important Geological Sites

- 346** Local Nature Reserves, Roadside Nature Reserves and Local Wildlife Sites
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