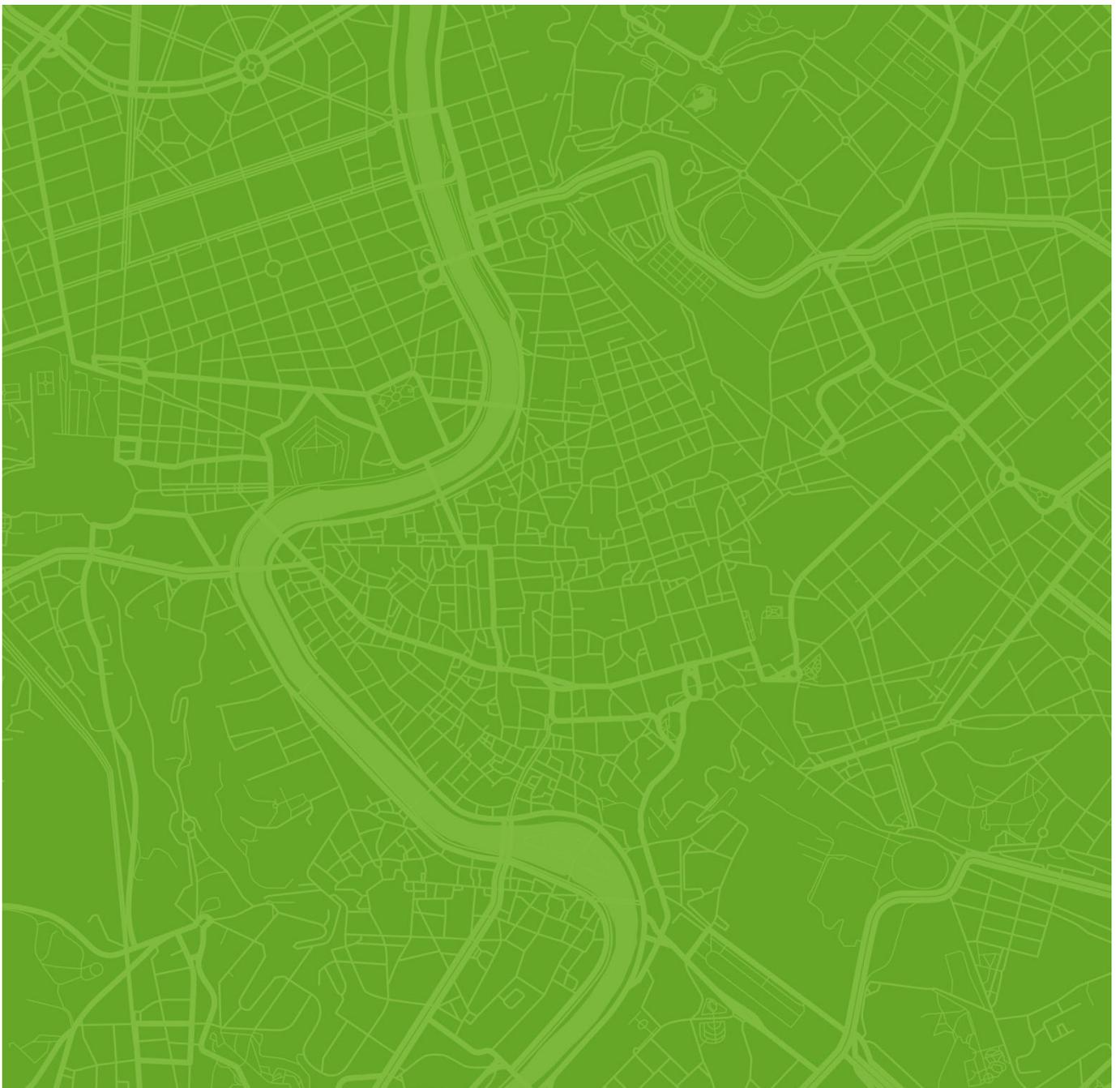


**Tonbridge and Malling Borough  
Council**

**Tonbridge and Malling  
Local Plan  
Interim Sustainability  
Appraisal Report**

**Final report**  
Prepared by LUC  
July 2022



**Tonbridge and Malling Borough Council**

**Tonbridge and Malling Local Plan**  
**Interim Sustainability Appraisal Report**

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# Chapter 1

## Introduction

**1.1** Tonbridge and Malling Borough Council (TMBC) commissioned LUC in March 2022 to carry out Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the emerging Tonbridge and Malling Local Plan. The new Local Plan will set out strategic and detailed policies to guide development proposals in Tonbridge and Malling up to 2040. Once adopted it will replace the current Local Development Framework (LDF) 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 Local Plan and it should be read in conjunction with that document.

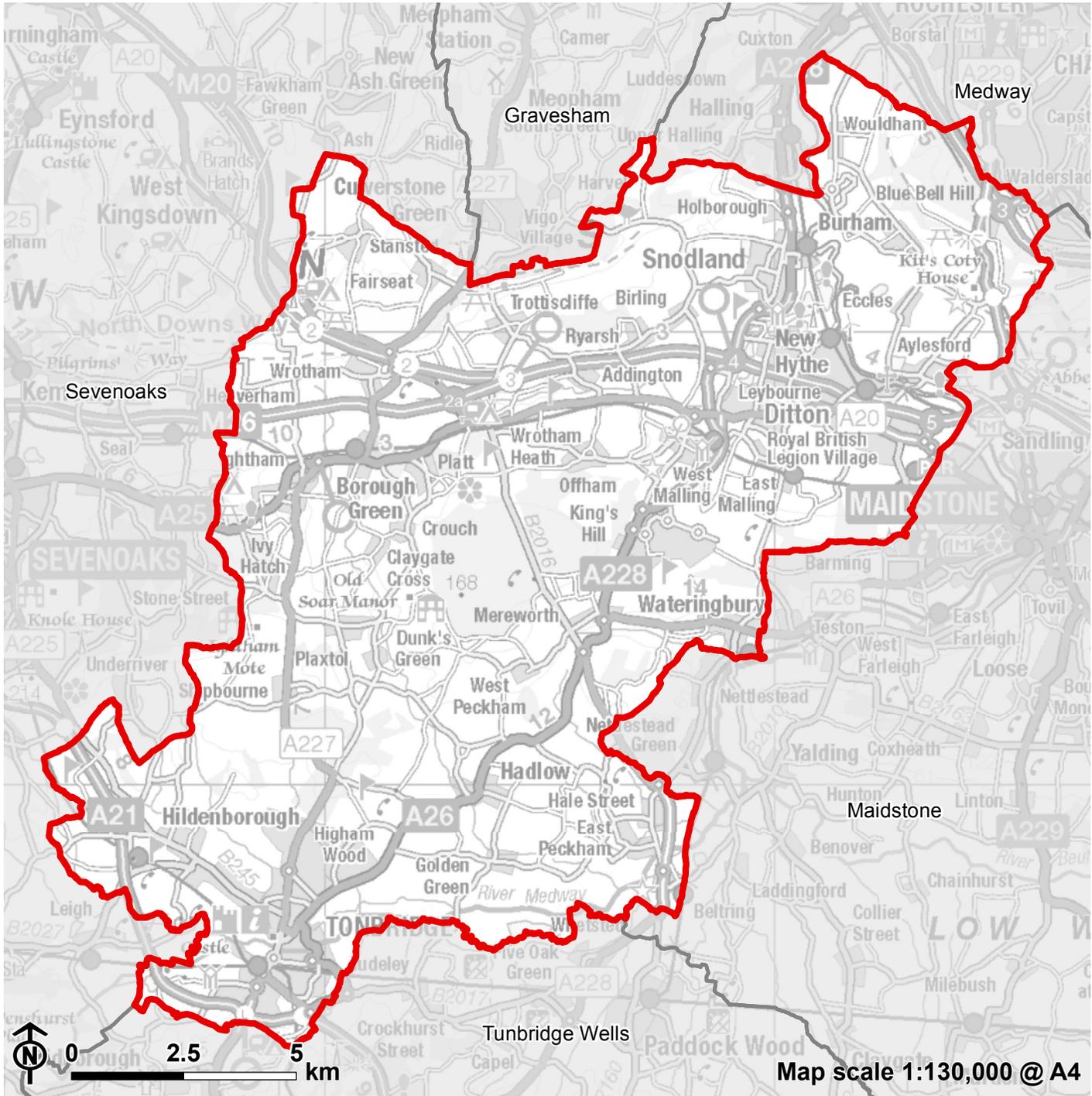
### The Plan Area

**1.2** Tonbridge and Malling Borough is one of the twelve district council areas within the county of Kent in South East England. The population of Tonbridge and Malling is approximately 132,500 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, with further urban areas including the Medway Gap, Kings Hill, Snodland and part of Walderslade, with additional rural service centres of Borough Green, East Peckham, Hadlow, Hildenborough and West Malling. The location of Tonbridge and Malling is presented in **Figure 1.1** below.

**1.3** The borough benefits from proximity to London and the South East coast. 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 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 roads. These roads connect the borough to wider transport networks including the M25 motorway and channel ports. Tonbridge and Malling is a diverse borough, which stretches to the north to include the Kent Downs Area of Outstanding Natural Beauty (AONB), and the High Weald AONB in the south. The majority of the borough is covered by Green Belt. There are also several international, national and local environmental designations. The majority of the borough is rural in nature.



**Figure 1.1: Location of Tonbridge and Malling**



- Tonbridge and Malling Boundary
- Neighbouring local authority

EB:Horton\_K LUC  
FIG\_1\_1\_11963\_r0\_Location  
20/07/2022

Source: Natural England, Tonbridge and Malling  
Borough Council

## Tonbridge and Malling Local Plan (2021 to 2040)

**1.4** The current suite of adopted development plan documents that make up the TMBC Local Development Framework (LDF) date back to 2007-10 and have a time horizon of 2021. These plans pre-date current national policy and practice guidance and local evidence.

**1.5** The Council prepared and submitted a Local Plan for examination on 23 January 2019. However, the Local Plan was withdrawn as the appointed Inspectors concluded that the Council had failed to meet the legal Duty to Cooperate (DtC) requirements in respect of addressing the issue of unmet housing need arising in the neighbouring district of Sevenoaks. Therefore, TMBC does not have an up-to-date Plan in place and is in the process of reviewing and updating the work undertaken previously, with a view to submit their Local Plan for examination in 2024.

### Outline of the Tonbridge and Malling Local Plan - Regulation 18

**1.6** The Regulation 18 Local Plan consults on the vision for the Local Plan and various non-strategic matters, but in particular focuses on a range of strategic matters that TMBC believes are relevant and need to be addressed in the Local Plan, including:

- Housing
- Economic development
- Transport
- Tonbridge (as the borough's strategic town centre)
- Retail
- Community facilities and infrastructure
- Natural environment
- Built and historic environment
- Green Belt
- Climate change

**1.7** For each of these topic areas, the Council seeks to set out what the key issues are and asks various consultation questions including what the priorities are for Tonbridge and Malling Borough. Various strategic options are presented for consultation, including:

- Quantum options

- Spatial options
- Options for the future development of Tonbridge
- Options to prevent the merging of settlements in the North East of the borough

**1.8** The Regulation 18 Local Plan also includes a list, in Appendix B, of reasonable alternative site options identified through the Call-for-Sites exercise (undertaken between December 2021 and February 2022), the Urban Capacity Study, and allocations from the withdrawn Local Plan which were not submitted during the Call-for-Sites exercise and were not identified in the Urban Capacity Study – these are sites TMBC proposes to consider for allocation for the following uses:

- Residential development
- Employment development
- Mixed-use development

**1.9** At this stage, preferred site options are not identified from the suite of reasonable alternative options. These will be set out at the next stage of plan-making, and the Council will draw on the SA findings as well as other information to inform decision making.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.10** Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the Strategic Environmental Assessment (SEA) Regulations (as amended)<sup>1</sup>. The SEA Regulations remain in force post-Brexit and it is a legal requirement for the Local Plan to be subject to SA and SEA throughout its preparation.

**1.11** On 11<sup>th</sup> May 2022 the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report. 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.

<sup>1</sup> 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).

**1.12** SA and SEA are tools used at the plan-making stage to assess the likely effects of the plan when judged against reasonable alternatives. SEA considers only the environmental effects of a plan, while SA considers the plan's wider economic and social effects in addition to its potential environmental impacts. SA should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, so a separate SEA should not be required. An approach which satisfies the requirements for both SA and SEA is advocated in the Government's Planning Practice Guidance (PPG)<sup>2</sup>. Practitioners can comply with the requirements of the SEA Regulations through a single integrated SA process – this is the process that is being undertaken by Tonbridge and Malling. From here on, the term 'SA' should therefore be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

**1.13** 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 plan and the SA Report.

**Stage E:** Monitoring the significant effects of implementing the plan.

## Meeting the Requirements of the SEA Regulations

**1.14 Table 1.1** at the end of this section signposts the relevant sections of this SA Report that are considered to meet the SEA Regulations requirements. This table will be included in the SA Report at each stage of plan preparation to show how the requirements of the SEA Regulations have been met through the SA process.

## Structure of the SA Report

**1.15** This chapter has described the background to the production 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 social, economic and environmental characteristics of Tonbridge and Malling and identifies the key sustainability issues facing the borough.
- **Chapter 4** presents the SA findings for the strategic policy options that have been considered for the Local Plan to date.
- **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** describes suggested indicators for monitoring the potential sustainability effects of the Local Plan.
- **Chapter 7** presents the conclusions of the SA of the Regulation 18 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 explains how they have been addressed.
- **Appendix B** presents a review of international, national and local plans, policies and programmes of relevance to the SA.
- **Appendix C** presents baseline information for Tonbridge and Malling.
- **Appendix D** presents the criteria and assumptions that have been used to ensure consistency in the SA of the reasonable alternative site options.

**1.16** The detailed SA site proformas for the reasonable alternative site options are presented in a separate Annex 1 to this SA report, due to their volume.

<sup>2</sup> Ministry of Housing, Communities and Local Government (last updated 1 October 2019) Planning Practice Guidance:

<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>.

Table 1.1: Meeting the requirements of the SEA Regulations

SEA Regulations Requirement	Covered in this Report?
Environmental Report	
<p>Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:</p> <ol style="list-style-type: none"> <li>1. Implementing the plan or programme; and</li> <li>2. Reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.</li> </ol> <p>(Regulation 12(1) and (2) and Schedule 2).</p>	<p>This SA Report which has been produced to accompany consultation on the Regulation 18 Local Plan constitutes the 'environmental report'.</p>
<p>An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.</p>	<p>Chapter 1, Chapter 3, Appendix B and Appendix C.</p>
<p>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</p>	
<p>The environmental characteristics of areas likely to be significantly affected.</p>	
<p>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 areas designated pursuant to Directives 79/409/EEC on the conservation of wild birds and the Habitats Directive.</p>	
<p>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.</p>	
<p>The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as:</p> <ol style="list-style-type: none"> <li>1. biodiversity;</li> <li>2. population;</li> <li>3. human health;</li> <li>4. fauna;</li> <li>5. flora;</li> <li>6. soil;</li> <li>7. water;</li> <li>8. air;</li> <li>9. climatic factors;</li> <li>10. material assets;</li> <li>11. cultural heritage, including architectural and archaeological heritage;</li> <li>12. landscape; and</li> <li>13. the interrelationship between the issues referred to in sub-paragraphs (a) to (l).</li> </ol>	<p>Chapters 4 and 5, and separate Annex 1.</p>

SEA Regulations Requirement	Covered in this Report?
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.	Chapters 4 and 5.
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.	Chapters 2 and 4
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 6.
A non-technical summary of the information is provided under paragraphs 1 to 9.	A separate non-technical summary document has been prepared to accompany this report.
<p>The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:</p> <ul style="list-style-type: none"> <li>■ Current knowledge and methods of assessment;</li> <li>■ The contents and level of detail in the plan or programme;</li> <li>■ The stage of the plan or programme in the decision-making process; and</li> <li>■ The extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.</li> </ul> <p>(Regulation 12 (3))</p>	The Environmental Report at each stage of the SA will adhere to this requirement.
<b>Consultation</b>	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies.  (Regulation 12(5))	The SA Scoping Report was produced by JBA Consulting for Tonbridge and Malling Council and consulted on from November 2021. The responses received are summarised in Appendix A.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).	Consultation on the Regulation 18 Local Plan is taking place during autumn 2022. The Regulation 18 Local Plan is accompanied by this SA Report.
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	The Local Plan is not expected to have significant effects on other EU Member States.
<b>Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)</b>	
<p>Provision of information on the decision:</p> <ul style="list-style-type: none"> <li>■ When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed: <ul style="list-style-type: none"> <li>– The plan or programme as adopted;</li> <li>– A statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered</li> </ul> </li> </ul>	To be addressed after the Local Plan is adopted.

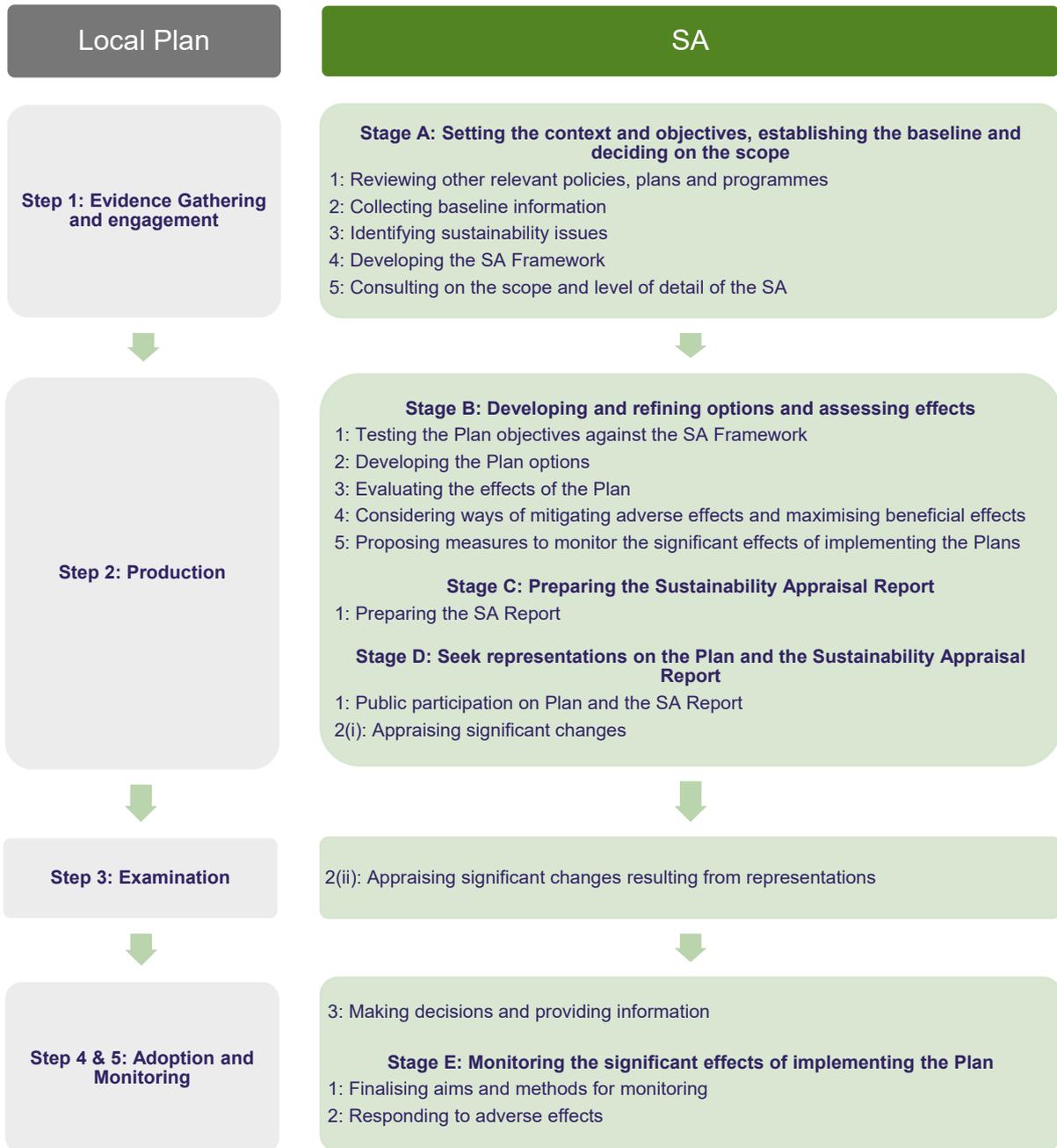
SEA Regulations Requirement	Covered in this Report?
<p>into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</p> <ul style="list-style-type: none"> <li>– The measures decided concerning monitoring.</li> </ul>	
Monitoring	
<p>The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.</p> <p>(Regulation 17(1))</p>	<p>Chapter 6 describes the measures that should be taken towards monitoring the likely significant effects of the Local Plan.</p>

## 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 2040 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 SA to be carried out as an integral part of the plan-making process. **Figure 2.1** overleaf sets out the main stages of the plan-making process and shows how these correspond to the SA 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.

## SA Stage A: Scoping

**2.3** The Scoping stage of SA involves understanding the social, economic and environmental 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. The Scoping stage of the SA was completed for Tonbridge and Malling Borough Council by JBA Consulting in January 2022.

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

**2.4** A Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans 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 policies, plans, and programmes (PPPs) 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. This review was initially prepared by JBA Consulting and presented in the SA Scoping Report<sup>3</sup>. The review has 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

**2.6** 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.

**2.7** 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.

**2.8** 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.

**2.9** The SEA Regulations require an assessment of effects in relation to the following 'SEA topics': biodiversity, population, 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 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

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

**2.11** Key sustainability issues facing Tonbridge and Malling and an analysis of their likely evolution without the Local Plan are detailed in **Chapter 3**. Key sustainability issues for Tonbridge and Malling were originally identified in the SA Scoping Report (final version January 2022). These issues were reviewed as part of this Interim SA Report and have been revised as appropriate, in light of the updated policy review and baseline information.

### Develop the SA framework

**2.12** The relevant sustainability objectives identified by the review of other policies, plans, and programmes, together with the key sustainability issues facing the borough identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the 'SA framework') against which the effects of the Local Plan would be assessed.

**2.13** Development of the 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

<sup>3</sup> JBA Consulting (January 2022) Tonbridge and Malling Borough Council Local Plan Sustainability Appraisal Scoping Report: Final Report [online]. Available at:

<https://www.tmbc.gov.uk/downloads/file/2028/sustainability-appraisal-scoping-report>

supporting criteria that are used to guide the appraisal of the policies and proposals within a plan.

**2.14** The SA framework for the Tonbridge and Malling Local Plan was informed initially by the review of relevant policies, plans and programmes as well as the baseline information for the plan area. The SA objectives also take into account the types of issues that are capable of being affected by the land use planning system.

**2.15** On appointment to undertake the remaining stages of the SA on behalf of TMBC, LUC undertook a review of the SA framework. This work was undertaken to ensure that the SA framework was consistent with best practise, that consultation comments on the SA Scoping Report were appropriately reflected, and to ensure the key sustainability issues facing the borough were addressed by the SA objectives.

**2.16** A small number of changes have been made to some of the SA objectives in the SA framework since it was presented in the Scoping Report. This includes:

- The removal of the sub-objective that focused on access to and provision of housing, originally part of SA Objective 2: To improve equality and access to community facilities and services. That sub-objective is now the new headline SA Objective 14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures. The decision for this to be a separate objective is made because housing provision is a key element of the Local Plan and it is helpful for the SA to appraise it in its own right rather than only as a sub-objective.
- Geodiversity was previously not included in the SA framework. This has now been included in SA Objective 5.
- There was previously some duplication, with a small number of sub-objectives being included under multiple SA Objectives. Unnecessary duplication has been removed to ensure that sub-objectives are included only where they are most applicable and relevant to the headline SA Objective. This helps to avoid effects being double counted within the appraisal work.

**2.17** 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

**2.18** 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.

**2.19** 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 November and December 2021.

**2.20 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 by JBA Consulting in the final SA Scoping Report which was published in January 2022. In light of the comments received, a number of amendments were made to the review of policies, plans, and programmes, the baseline information, key sustainability issues and the SA framework. These are reflected in this current SA report.

### SA Stage B: Developing and refining options and assessing effects

**2.21** 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.

**2.22** 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—*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme.”*

**2.23** Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of:

*“(h) an outline of the reasons for selecting the alternatives dealt with”*

**2.24** 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 National Planning Policy Framework (NPPF)).

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

**2.26** The Regulation 18 Local Plan sets out strategic options for consultation, that will help inform the spatial and quantum approaches to development for the Local Plan, and specifically the future development of Tonbridge and how to prevent the merging of settlements in the North East of the borough. These options are considered by the Council to be the reasonable alternatives for the scale of growth and spatial strategy for the Local Plan. These have been subject to SA, with the findings presented in this Interim SA Report in **Chapter 4**. **Chapter 4** also provides further explanation of the identification of options.

**2.27** Reasonable alternative options for the residential, employment and mixed use sites to be allocated in the Local Plan have been identified by TMBC. These sites were identified via a call-for-sites exercise and an Urban Capacity Study. In addition, allocations from the withdrawn Local Plan which were not submitted during the call-for-sites exercise and were not identified in the Urban Capacity Study have been identified in the pool of reasonable alternative options.

**2.28** All sites identified in the pool of reasonable alternative options have been subject to SA. The findings are presented in this Interim SA Report in **Chapter 5**.

### SA Stage C: Preparing the Sustainability Appraisal Report

**2.29** This SA Report describes the process that has been undertaken to date in carrying out the SA of the Tonbridge and Malling Local Plan 2040. The current Regulation 18 Local Plan that is the subject of this SA Report includes a number of open-ended questions which are not of a format suitable for appraisal. Where options are able to be appraised, this has been carried out and the SA findings are presented in this report, including SA findings for the strategic policy options and reasonable alternative site options listed in the consultation document.

**2.30** 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 at this early

stage of the SA (cumulative effects, for example, are more able to be assessed once decisions have been made about which combinations of options to take forward in the next iteration of the Local Plan).

**2.31** The SA findings are set out in **Chapters 4 and 5** 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

**2.32** Information about consultation on the SA that has already taken place at earlier stages of plan-making has been provided above. TMBC is now inviting comments on the Regulation 18 Local Plan. This SA Report is being published on the Council's website alongside the Regulation 18 Local Plan, so that the two documents can be read in parallel. Consultation comments received on this Interim SA Report will be taken into account at the next stage of the SA.

### SA Stage E: Monitoring implementation of the Local Plan

**2.33** Draft recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Local Plan are included in **Chapter 6** of this Interim SA Report and these will be updated as appropriate during later stages of the SA.

### Appraisal methodology

**2.34** Reasonable alternative options for the strategic policies and site allocations to be included in the Local Plan have been appraised against the SA objectives in the SA framework (see **Table 3.2** in **Chapter 3**), with symbols being attributed to each option to indicate their likely effects on each SA objective as shown in **Figure 2.2**. 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, yellow, orange, etc.).

**2.35** 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 **Figure 2.2**. 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.

**Figure 2.2: Key to symbols and colour coding used in the SA**

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- or +/-	Mixed minor or significant effects likely
-	Minor negative effect likely
-/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

### The use of site assessment criteria and uncertainty

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

### Difficulties and Data Limitations

**2.37** The SEA Regulations, Schedule 2(8) require 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.”*

**2.38** 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).
- Some of the data which are available at the national and Borough/District levels are based on the reporting of the 2011 Census. This data allows for comparisons to be made between the borough and national performance in relation to number of indicators; however it is recognised that data is now relatively old considering the timings of the national census. If data from the 2021 Census becomes available later in the SA process it will be used to inform the SA as appropriate.
- 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. Reference is made to ‘easy walking distance’ in the appraisal assumptions. Research by the Institute 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. To recognise the potential for walking distances to be greater, when applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances a 10% buffer was applied to account for the potential difference between the straight line distance and the actual distance involved in a journey.
- 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.
- Spatial analysis was based on straight line walking distances. Examination of actual distances via the rights of way network was not possible since digital data were not available to indicate the access points of services and facilities or the likely entry and exit points from 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, 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. While it is recognised that in some cases sites might be close to high value non-designated assets, the strategic nature of the SA meant that it was not possible to investigate this potential for each site option and the likely effect was based on designated sites only. This approach was considered to be the best way of ensuring consistency and a comparable level of detail in each site appraisal.
- 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 and carbon emissions.
- The available GIS data for agricultural land classification did not distinguish between Grade 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the scores, as set out in the assumptions (see **Appendix D**).
- Additional evidence is expected to be produced as the Local Plan process advances. This will touch on matters including landscape, transport and heritage. As and when this becomes available, not only will it inform the more detailed Local Plan but also inform the SA process.

## Chapter 3

# Sustainability Context

**3.1** Schedule 2 of the SEA Regulations requires information on the following (numbering relates to the specific numbered list in Schedule 2):

1. *“an outline of the contents and main objectives of the Plan and its relationship with other relevant plans or programmes”* and
5. *“the environmental protection objectives established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”.*

**3.2** An outline of the Regulation 18 Local Plan was provided in **Chapter 1**. The other reporting requirements are met in this chapter.

### Relationship with other Relevant Plans or Programmes

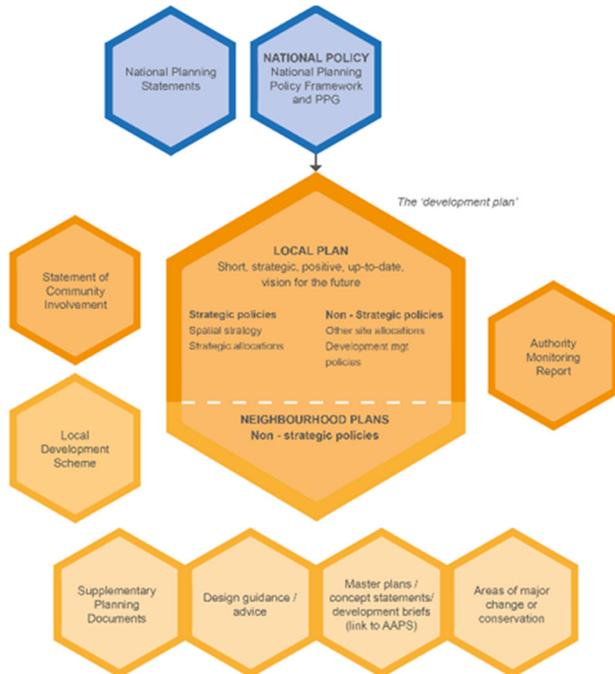
**3.3** The Tonbridge and Malling Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as shown below in **Figure 3.1**. The new Local Plan will eventually replace the adopted Core Strategy (September 2007), Development Land 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<sup>4</sup> 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**.

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<sup>4</sup> 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.

**Figure 3.1: Relationship between the Tonbridge and Malling Local Plan and other relevant plans or programme**



## Policy context

**3.4** The policy context in which the Tonbridge and Malling Local Plan is being prepared informs consideration of what constitute 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 a number of key factors:

- Brexit - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. Directly applicable EU law now no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law.
- On 11<sup>th</sup> May 2022 the Government published the Levelling up and Regeneration Bill, which sets out in detail the Government's proposals for reforming the planning system. Amongst other things, the Bill proposes the replacement of the current SEA regime with a new requirement for an Environmental Outcomes Report.

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.

- COVID-19 – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development, changes to permitted development rights, increased remote working and reduced commuting and related congestion and air pollution, increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced.

**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** Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') were transposed into the Strategic Environmental Assessment (SEA) Regulations<sup>5</sup> and Habitats Regulations<sup>6</sup>. Following the UK's departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Tonbridge and Malling Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

**3.7** There were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully

<sup>5</sup> 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).

<sup>6</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

left the EU and therefore EU Directives no longer apply to the UK. The relevant Regulations are summarised in **Appendix B**.

## National

**3.8** There is an extensive range of national policies, plans 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 policies, plans 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 Tonbridge and Malling 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 the SA are summarised in **Appendix B**.

### The National Planning Policy Framework and Planning Practice Guidance

**3.9** The NPPF<sup>7</sup> 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, revised in July 2018, updated in February 2019 and again in July 2021. The most recent update to the NPPF places an increased focus on design quality. This includes for sites as well as for places as a whole. The terminology included in the Framework on protecting and enhancing the environment and promoting a sustainable pattern of development has been revised. Furthermore, revisions are included in relation to policies which address opting out of permitted development, the use of masterplans and design codes and the important contribution of trees in new developments.

**3.10** The 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 addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”*

**3.11** The PPG<sup>8</sup> 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.

**3.12** 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.

**3.13 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 a low carbon future in a changing climate, taking full account of flood risk 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 flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.

**3.14** 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. Local Plan policies can further support the development of renewable energy technologies where appropriate, in line with climate change mitigation strategies and targets.

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

**3.16** In relation to **health and wellbeing**, healthy, inclusive and safe places which promote social integration, are safe and accessible, and enable and support healthy lifestyles are supported through the Framework.

**3.17** 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 recreation 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, cultural venues and places of worship is supported. Importantly, Local plans

<sup>7</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework

<sup>8</sup> Ministry of Housing, Communities and Local Government (2021) Planning Practice Guidance

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<sup>9</sup>. The need for policies to be reflective of this longer time period is to take account of the likely timescale for delivery.

**3.18** The delivery of new housing is considered to support local communities by meeting housing needs and addressing shortages. The 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 wellbeing of local communities.

**3.19** The NPPF sets out the approach Local Plans should have in relation to **biodiversity** 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 conservation, restoration and enhancement of priority habitats and species, ecological networks and 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.

**3.20** The Local Plan, through its review of the spatial strategy, 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.

**3.21** In relation to **landscape**, the NPPF sets the planning principles of recognising the intrinsic beauty and character of the countryside as well as protecting and enhancing valued landscapes. Reference is included with regards this purpose at National Parks, The Broads and Areas of Outstanding Natural Beauty and the importance of their setting is recognised.

**3.22** The Local Plan should be supportive of an approach to development which would protect the landscape character of the borough. Where appropriate it should also seek to protect the individual identities of the boroughs settlements, with regard for the potential coalescence. The SA should identify those alternatives which contribute positively to landscape character.

**3.23** 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. The Framework places a focus on making ‘beautiful’ and ‘sustainable’ places. The use of plans, design policy, guidance and codes is encouraged. The SA provides an opportunity to test alternatives in terms of the contribution they can make to the protection and enhancement of the historic environment.

**3.24** The Local Plan can take forward a spatial strategy which helps to limit adverse impacts on designated and non-designated heritage assets, 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.

**3.25** The NPPF states that new and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, pollutions including **water pollution and air quality**. Inappropriate development in areas at risk of **flooding** should be avoided. Plans should take a proactive approach to

<sup>9</sup> 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”.

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 infrastructure provision for water supply and wastewater.

**3.26** The 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.

**3.27** The NPPF states that 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**.

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

**3.29** The Framework 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 and innovation. 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.

**3.30** 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.”

**3.31** The Local Plan should seek to maximise the potential benefits of nearby strategic growth, whilst at the same time ensuring the vitality and viability of smaller localised economies, through the review of the spatial strategy. Ensuring that local town centres and services and facilities at settlements in the plan area are maintained and enhanced is

also important and will also provide support for local communities. The SA process can support the development of the Local Plan to ensure that its policies are considerate of impacts on the economy in the borough. The process can also be used to demonstrate that impacts on the viability of town centres in the area and surrounding areas have been considered.

**3.32** 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.

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

#### Other national policies, plans and programmes

**3.34** Numerous other policies, plans and programmes (PPPs) at the national level are of relevance to preparation of the Local Plan and the SA. Unlike the NPPF, most of the documents focus 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 to be of most relevance for the SA have been grouped by the topics they most directly seek to address, and green boxes below each topic heading summarise the implications of the national PPPs (including the NPPF) for the Local Plan and SA.

#### Climate change adaption and mitigation, energy efficiency and waste minimisation

**3.35** The relevant national PPPs under this topic are:

- HM Government, The Climate Change Act 2008 (as amended)

- HM Government, Net Zero Strategy: Build Back Greener (2021)
- Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018).
- Department for Transport, Decarbonising Transport: Setting the Challenge (2020).
- Defra and the Environment Agency, Understanding the risks, empowering communities, building resilience: The National Flood and Coastal Erosion Risk Management Strategy for England (2020).
- Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014).
- Defra, Waste Management Plan for England (2013).
- HM Government, The Clean Growth Strategy (2017).
- Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015).

#### **Implications for the Tonbridge and Malling 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. This can be done through siting development in areas where sustainable transport patterns can be best achieved and encouraging development to make use of more sustainable sources of energy. The Local Plan should also contain policies to encourage appropriate use of Sustainable Drainage Systems (SuDS) and to ensure that surface water is discharged as high up the drainage hierarchy as possible. Policies should also be included to promote 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**

**3.36** The relevant national PPPs under this topic are:

- Public Health England (PHE), PHE Strategy 2020-25.
- HM Government, Laying the foundations: housing strategy for England (2011).

#### **Implications for the Tonbridge and Malling Local Plan and SA:**

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

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

#### **Environment (biodiversity/geodiversity, landscape and soils)**

**3.37** The relevant national PPPs under this topic are:

- Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018).
- Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011).
- Defra, Biodiversity offsetting in England Green Paper (2013).
- Defra, Safeguarding our Soils – A Strategy for England (2009).

**3.38** The Environment Act 2021 also compromises part of the environmental policy context for the preparation of the Local

Plan and undertaking of the SA. The Act seeks to improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment. The Act introduces a mandatory requirement for 10% biodiversity net gain to be achieved at most developments.

#### **Implications for the Tonbridge and Malling Local Plan and SA:**

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

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

#### **Historic environment**

**3.39** The relevant national PPPs under this topic are:

- The Heritage Alliance, Heritage 2020.
- Historic England, Corporate Plan 2018-2021.
- Historic England, Sustainability Appraisal and Strategy Environmental Assessment: Historic England Advice Note 8 (2016).

#### **Implications for the Tonbridge and Malling 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. It should identify those locations at which development would have the greatest potential to adversely impact the historic environment, as informed by the Heritage Strategy for the Local Plan.

#### **Water and air**

**3.40** The relevant national PPPs under this topic are:

- Environment Agency, Managing Water Abstraction (2016).
- Defra, Water White Paper (2012).
- Defra, Clean Air Strategy (2012).

#### **Implications for the Tonbridge and Malling Local Plan and SA:**

The Local Plan should consider setting out policies to promote the efficient use of water and limit all types of pollution including water pollution. It should also seek to limit pressure on the wastewater treatment (WwT) infrastructure and water supply. Options for the spatial strategy should take account of areas which have highest sensitivity in relation to these issues, including Source Protection Zones (SPZ) and Air Quality Management Areas (AQMA). To limit the potential for air quality issues to be intensified as development is delivered over the plan period the Local Plan should also factor in the contribution development 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**

**3.41** The relevant national PPPs under this topic are:

- HM Government, Industrial Strategy: building a Britain fit for the future (2017).
- Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021.

- LEP Network, LEP Network response to the Industrial Strategy Green Paper Consultation (2017).

#### **Implications for the Tonbridge and Malling Local Plan and SA:**

The Local Plan should set out policies to support the projected level of economic growth required over the plan period. This should include support for sustainable employment growth to benefit all members of the community as to reduce disparity in the plan area. Policies to support the level of infrastructure required for the economy to function successfully should also be set out. Policies should be supportive of economic growth that is 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 the Town, District and Local 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**

**3.42** The relevant national PPPs under this topic are:

- Department for Transport, Transport Investment Strategy (2017).

#### **Implications for the Tonbridge and Malling 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. The Local Plan can also be supportive of more sustainable modes of transport. Furthermore, the selection of options for the updated spatial strategy 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 options should also be informed by the proximity of development to essential services and facilities which is likely to influence 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**

**3.43** Below the national level there are further plans and programmes which are of relevance to the Local Plan and SA process. These plans and programmes sit mostly at the sub-regional, county and district levels. Details of those plans and programmes which are of most relevance at this level are provided in **Appendix B**.

### **Surrounding Development Plans**

**3.44** Development in Tonbridge and Malling will not be delivered in isolation from those areas around it. Given the interconnection between Tonbridge and Malling and the surrounding areas there is potential for cross-boundary and in-combination effects where development is proposed through development plans in neighbouring authorities. As such, a summary of the Local Plans for the following local authority areas which surround Tonbridge and Malling is also provided in **Appendix B**:

- Maidstone
- Tunbridge Wells
- Sevenoaks
- Gravesham
- Medway

**3.45 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.

### **Baseline Information**

**3.46** 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.

**3.47** Schedule 2 of the SEA Regulations requires that the Environmental Report includes descriptions of:

*“(2) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”*

*“(3) The environmental characteristics of areas likely to be significantly affected.”*

**3.48** 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.

**3.49** 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.

**3.50** The baseline information for Tonbridge and Malling is presented in **Appendix C**.

**3.51** 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. Where there are data gaps in the baseline, or reports not yet published, these are highlighted in the text in **Appendix C**. 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

**3.52** Key sustainability issues for Tonbridge and Malling were originally identified in the SA Scoping Report (January 2022). These issues have been reviewed and revised in light of the updated policy review and baseline information. The current set of key issues is presented in **Table 3.1**.

**3.53** It is also a requirement of the SEA Regulations that consideration is given to the likely evolution of the environment in the plan area (in this case Tonbridge and Malling Borough) if the Local Plan was not to be implemented. This analysis is also presented in the final column of **Table 3.1** in relation to each of the key sustainability issues.

**3.54** The information in **Table 3.1** shows that, in general, the current trends in relation to the various social, economic and environmental issues affecting the plan area would be more likely to continue without the implementation of the new Local Plan, although the policies in the adopted development plan would still go some way towards addressing many of the issues. In most cases, the new Local Plan offers opportunities

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

Table 3.1: Key Sustainability Issues for Tonbridge and Malling

Topic	Key sustainability issue	Likely evolution of the issue without the Local Plan
Landscape character	<p>The key sustainability issue affecting landscape character and quality within the borough is the pressure of new development within the AONBs and their setting, and the effects this has on the preservation of the key landscape characteristics. This in turn effects levels of tranquillity, particularly in the rural areas of the borough.</p>	<p>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.</p>
Ecology and biodiversity	<p>International, national and local designated sites within the borough may be at risk from damage as a result of development pressure and associated human disturbance.</p> <p>There are two SACs which are subject to international protection under the Habitats Directive, and therefore, must be protected in accordance with this legislation. At a local scale, developments should seek to support nature recovery including the establishment, enhancement, and extension of ecological networks within the borough.</p>	<p>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.</p>
Water environment	<p>The River Medway and River Bourne are significant water resources within the borough and there are areas of Flood Zone 3 surrounding these watercourses. 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.</p> <p>The ecological quality of the borough's waterbodies is generally of moderate status, whilst the chemical quality is classified as 'fail'. Further development in the borough could lead to an increase in the amount of surface water runoff, including pollution, from urban areas and cause further degradation of the water quality of these watercourses.</p>	<p>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 mitigate any potential impacts on water resources.</p> <p>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.</p>
Land	<p>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. Development could also potentially affect good quality agricultural land, reducing the amount of land in the borough available for agriculture.</p>	<p>The new Local Plan provides an opportunity to ensure that land is not compromised by future growth by directing development away from contaminated land and that appropriate measures are required to ensure risks of contaminants are minimised. The new Local Plan provides the opportunity to prioritise the development of brownfield land over greenfield land and poorer agricultural land over the best and most versatile.</p>

Topic	Key sustainability issue	Likely evolution of the issue without the Local Plan
	<p>Any development on contaminated land should adequately deal with the contamination risk as to prevent harm to human health, property and the environment.</p> <p>Continued industrial activities could release contaminants into the environment through pollution incidents such as release of chemicals or dust from quarrying. Often quarries are closely related to RIGS, which are also important geological conservation sites. There is a need for the protection and maintenance of the integrity of RIGS, particularly those that may be affected by nearby development.</p>	<p>The new Local Plan provides an opportunity to manage development pressures on designated sites such as RIGs, ensuring their protection.</p>
Historic environment	<p>Tonbridge and Malling Borough contains a wealth of heritage assets. 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.</p>	<p>The new Local Plan provides an opportunity to conserve and enhance the historic environment as well as improve the accessibility and interpretation of it.</p>
Air quality	<p>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 and the introduction of more AQMAs to address these local impacts on air quality.</p>	<p>The new Local Plan provides an opportunity to plan development and supporting infrastructure sustainably to minimise deterioration in air quality withing inhibiting the need for growth.</p>
Climate	<p>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.</p> <p>Flooding from increased rainfall and more intense storm events 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,</p>	<p>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.</p> <p>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.</p> <p>The new Local Plan offers an opportunity to improve public and active transport connections and capacity, and provide development of housing, employment, services and facilities in locations that will reduce the need to travel by car.</p>

Topic	Key sustainability issue	Likely evolution of the issue without the Local Plan
	<p>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.</p> <p>Projected population growth has the potential to increase greenhouse gas emissions from a variety of lifestyle choices such as private vehicle use. Actions and objectives to reduce the borough's carbon emissions will need to take this into account. New development could reduce associated emissions relative to existing developments through appropriate selection of sustainable building design and materials.</p>	
Population and human health	<p>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 and an increasing ageing population in the borough.</p> <p>There are some areas of deprivation across the borough, creating disparity. There are also a number of health issues that affect the community which increases vulnerability of the population and places further demands on community services and facilities.</p>	<p>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.</p> <p>The new Local Plan offers an opportunity to reduce the gap between the most and least deprived by providing for, or encouraging access to, healthcare facilities, well designed and located development and opportunities to exercise, all of which will support health and wellbeing.</p>
Economy and employment	<p>Although 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, residents commute out of the borough to attain highly skilled employment, with individual's community in to fulfil lower skilled jobs.</p> <p>The movement of workers between Tonbridge and Malling Borough and the adjacent boroughs also places pressure on the borough's transport network, increasing congestion.</p>	<p>The new Local Plan can help support a strong economy, growth, and new businesses, by identifying the employment sites and infrastructure required.</p>
Material assets	<p>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 pressure, particularly around areas of current high traffic volume.</p>	<p>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.</p>

Chapter 3  
Sustainability Context

Tonbridge and Malling Local Plan 2021 to 2040  
July 2022

Topic	Key sustainability issue	Likely evolution of the issue without the Local Plan
	<p>The borough has good ProW networks which helps facilitate access to the countryside, and provision of open space has increased. However, the predicted increase in population will require the provision of open space to increase accordingly.</p> <p>The Local Plan offers opportunity to support and improve public transport networks and integrate the provision of open space with new developments.</p>	<p>The new Local Plan provides the opportunity to ensure open space and recreation provision, providing opportunities to promote healthy lifestyles, social cohesion and benefits for mental health.</p>
Waste and minerals	<p>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 increased pressure on waste management systems and facilities.</p>	<p>The new Local Plan provides the opportunity to support the waste hierarchy including sustainable and well-designed development, requiring sustainable demolition and construction practises and the provision of space and infrastructure to support recycling.</p>

## The SA framework

**3.55** As described in **Chapter 2**, the relevant objectives established via the review of plans, policies, and programmes and the key sustainability issues identified by the baseline review informed development of a framework of sustainability objectives, the SA framework, against which the plan has been assessed. The SA framework for Tonbridge and Malling is presented in **Table 3.2**.

**3.56** The context for the appraisal of options for the Local Plan against each of the SA objectives is set by the sub-objectives in the table. 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

Table 3.2: SA framework for the Tonbridge and Malling Local Plan

SA Objectives and Sub-Objectives	Relevant SEA Topic
<p>1. To improve human health and well-being</p> <ul style="list-style-type: none"> <li>■ To reduce health inequalities amongst different groups in the community.</li> <li>■ To improve access to health and social care services.</li> <li>■ To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, children’s play areas and the countryside.</li> <li>■ To maintain low crime levels.</li> <li>■ To reduce the fear of crime.</li> <li>■ To reduce levels of anti-social behaviour.</li> <li>■ To encourage safety by design.</li> <li>■ To promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.</li> </ul>	<p>Population, Human Health</p>
<p>2. To improve equality and access to community facilities and services.</p> <ul style="list-style-type: none"> <li>■ To tackle homelessness more effectively.</li> <li>■ To improve access to cultural and leisure facilities.</li> <li>■ To maintain and improve access to essential services and facilities.</li> <li>■ To promote the use of more sustainable modes of transport.</li> <li>■ To encourage walking, cycling and the use of public transport.</li> </ul>	<p>Population, Human Health, Material Assets</p>
<p>3. To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</p> <ul style="list-style-type: none"> <li>■ To maintain and increase levels of participation and attainment in education for all members of local communities.</li> <li>■ To improve the provision of education and training facilities.</li> <li>■ To improve access to and involvement in higher education for 16-19 year olds.</li> </ul>	<p>Population</p>
<p>4. To encourage sustainable economic growth, business development, and economic inclusion across the borough</p> <ul style="list-style-type: none"> <li>■ To diversify employment opportunities.</li> </ul>	<p>Population</p>

SA Objectives and Sub-Objectives	Relevant SEA Topic
<ul style="list-style-type: none"> <li>■ To increase employment opportunities.</li> <li>■ To encourage economic growth.</li> <li>■ To reduce levels of unemployment.</li> <li>■ To improve physical accessibility to jobs.</li> </ul>	
<p>5. To protect and enhance biodiversity and geodiversity</p> <ul style="list-style-type: none"> <li>■ To protect and enhance designated sites of nature conservation importance.</li> <li>■ To protect and enhance wildlife especially rare and endangered species.</li> <li>■ To protect and enhance habitats and wildlife corridors.</li> <li>■ To provide opportunities for people to access wildlife and open green spaces.</li> <li>■ To increase biodiversity net gain.</li> <li>■ To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.</li> <li>■ To protect, enhance and expand ecological networks and their interconnectivity.</li> <li>■ Conservation of biodiversity, including priority habitats and species, under the NERC Act (S41).</li> <li>■ To protect and enhance sites designated for geodiversity.</li> </ul>	Biodiversity, Fauna & Flora
<p>6. To protect and enhance the borough's landscape and townscape character and quality</p> <ul style="list-style-type: none"> <li>■ To protect and enhance landscape character and quality.</li> <li>■ To protect and enhance townscape character and quality.</li> <li>■ Protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.</li> <li>■ To protect and enhance AONBs within the borough and their settings</li> </ul>	Landscape, Cultural heritage
<p>7. To protect and enhance the cultural heritage resource</p> <ul style="list-style-type: none"> <li>■ To protect and enhance historic buildings and sites.</li> <li>■ To protect and enhance historic landscape/townscape value.</li> </ul>	Cultural heritage

SA Objectives and Sub-Objectives	Relevant SEA Topic
<p>8. To protect and enhance the quality of water features and resources</p> <ul style="list-style-type: none"> <li>■ To protect and enhance ground and surface water quality.</li> <li>■ Reduce the risk of flooding to existing communities and ensure no new developments are at risk.</li> <li>■ To contribute towards achievement of relevant River Basin Management Plan aims.</li> <li>■ To protect and enhance water quantity, such as through high standards of water efficiency.</li> </ul>	Water, Population
<p>9. To conserve and enhance soil resources and guard against land contamination</p> <ul style="list-style-type: none"> <li>■ To reduce the amount of derelict, contaminated, and vacant land.</li> <li>■ To encourage development of brownfield land where appropriate.</li> <li>■ To protect soil functions and quality.</li> <li>■ Avoid development of 'best and most versatile' soil.</li> </ul>	Soil, Material assets
<p>10. To reduce greenhouse gas emissions so as to minimise climate change</p> <ul style="list-style-type: none"> <li>■ To reduce greenhouse gas emissions.</li> <li>■ To increase energy efficiency and require the use of renewable energy sources.</li> <li>■ To reduce the use of energy.</li> <li>■ To promote the use of more sustainable modes of transport.</li> <li>■ To reduce the use of private car.</li> <li>■ To encourage walking, cycling and the use of public transport.</li> <li>■ Encourage the uptake of ICT.</li> </ul>	Climate, Human health, Material Assets
<p>11. To improve adaptation to climate change so as to minimise its impact</p> <ul style="list-style-type: none"> <li>■ Reduce the impacts of climate change and reduce greenhouse gas emissions.</li> <li>■ To encourage the inclusion of SuDS in developments.</li> <li>■ To increase the use of materials which withstand climate change impacts (e.g. heat, extreme weather).</li> </ul>	Climate, Water, Biodiversity, Flora and Fauna

SA Objectives and Sub-Objectives	Relevant SEA Topic
<ul style="list-style-type: none"> <li>■ To increase the nature-based solutions such as green walls, tree-planting, etc.</li> </ul>	
<p>12. To protect and improve air quality</p> <ul style="list-style-type: none"> <li>■ To protect and improve local air quality.</li> </ul>	Air, Climate
<p>13. To protect material assets and minimise waste</p> <ul style="list-style-type: none"> <li>■ To ensure sustainable use of natural resources.</li> <li>■ To reduce the demand for raw materials</li> <li>■ To promote the use of recycled and secondary materials in construction</li> <li>■ To increase the proportion of waste recycling and reuse</li> <li>■ To reduce the production of waste</li> <li>■ To reduce the proportion of waste landfilled</li> </ul>	Material assets
<p>14. To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</p> <ul style="list-style-type: none"> <li>■ To supply an appropriate quantity of housing to satisfy demand.</li> <li>■ To supply an appropriate mix of sizes, types and tenures of properties in relation to the respective levels of demand.</li> <li>■ To promote housing that is of high quality.</li> </ul>	Population

## Chapter 4

# Sustainability Appraisal

## Findings for the Strategic Policy Options

**4.1** This chapter includes the explanation for the identification of the strategic policy options that have been considered to date and presents the SA findings for the strategic policy options. The Regulation 18 Local Plan sets out options for the scale of growth and spatial strategy for the Local Plan, grouped as follows:

- Quantum options
- Spatial options
- The future development of Tonbridge
- Options to prevent the merging of settlements in the North East of the borough

**4.2** The Regulation 18 Local Plan also includes a number of open-ended consultation questions and lists of issues for consultees to rank in priority order. These elements of the document are not of a format which can be appraised against the SA objectives. However, any draft policies that are developed at the next stage of the plan-making process, drawing on the outcomes of the current consultation, will be appraised at that point.

### Quantum options

**4.3** The expectation of national policy is that Local Plans should address assessed housing needs. Consequently, two options have been identified by Tonbridge and Malling Borough Council for the scale of housing growth to be delivered through the Local Plan.

**4.4** The evidence identifies a need for 839 dwellings per annum (2021 based) in Tonbridge and Malling, or 15,941 dwellings (gross) across the plan period up to 2040. However, the Council also wishes to assess a higher figure to see what is realistically achievable in the context of the local housing markets and being mindful of the need for flexibility to be able to adapt to rapid change. At this stage the SA has tested a figure of up to 10% above the evidence-based need in order to consider the principle of a higher level of delivery.

**4.5** No option has been considered or assessed that promotes development below the 839 dwellings per annum as it is considered an unreasonable alternative in the context of national policy and local evidence on housing affordability. In addition, given the large pool of sites currently identified and their potential yield, the borough will likely have sufficient available land to deliver the amount of development that the

evidence shows is needed. In these circumstances, the Council considers that any option which did not deliver as a minimum the identified housing need does not constitute a reasonable alternative.

**Option 1**

- Meeting Assessed Housing Need

**Option 2**

- Meeting Assessed Housing Need + up to 10%

**Table 4.1: Summary of SA findings for the Quantum Options**

SA Objective	Option 1	Option 2
1: To improve human health and well-being	+	+/-?
2: To improve equality and access to community facilities and services	+	+/-?
3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society	+	+/-?
4: To encourage sustainable economic growth, business development, end economic inclusion across the borough	0	0
5: To protect and enhance biodiversity and geodiversity	--?	--?
6: To protect and enhance the borough's landscape and townscape character and quality	--?	--?
7: To protect and enhance the cultural heritage resource	--?	--?
8: To protect and enhance the quality of water features and resources	-?	-?
9: To conserve and enhance soil resources and guard against land contamination	--?	--?
10: To reduce greenhouse gas emissions so as to minimise climate change	+/-	--/+
11: To improve adaptation to climate change so as to minimise its impact	-?	-?
12: To protect and improve air quality	+/-	--/+
13: To protect material assets and minimise waste	-?	-?
14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures	++	++?

**4.6** The level of growth within the borough can influence the promotion of more active lifestyles and active travel habits. Growth in the borough also has the potential to support the delivery of new healthcare facilities. It is expected that both quantum options would provide the critical mass needed to support provision of health and wellbeing related infrastructure. As such, a minor positive effect is identified for both Option 1 and Option 2 in relation to **SA objective 1: health and wellbeing**. However, in the case of Option 2, a minor negative effect is also identified in relation to SA objective 1 as delivering growth beyond assessed needs has more potential to cause capacity issues at existing healthcare facilities if they become overloaded. Minor positive effects are also expected for Option 1 and 2 in relation to **SA objective 2: access to services and facilities** and **SA objective 3: education**. As with healthcare, this extent of new growth in

the borough has the potential to provide sufficient critical mass to support delivery of new essential services and facilities, cultural and leisure facilities and education and training facilities. However, Option 2 could be more likely to overwhelm existing services and facilities and schools, and as a result minor negative effects are also identified in relation to SA objectives 2 and 3 for this option. The mixed effects from Option 2 on SA objectives 1, 2 and 3 are all uncertain at this stage as there is no evidence indicating a particular threshold at which new development could result in health, education and other services and facilities becoming overloaded, and the effects will also depend largely on the extent of new provision that is made alongside new housing development.

**4.7** Both quantum options will require significant land take for housing and employment development within the borough in order to meet or go beyond assessed needs. Whilst some

growth delivery may be on previously used land, it is likely that a significant proportion will be on greenfield land. There is potential for this to cause loss of habitats and habitat connectivity, adverse impacts on landscape character and the setting of heritage assets and the loss of high quality agricultural land. As such, potential significant negative effects are identified for Option 1 and Option 2 in relation to **SA objective 5: Biodiversity and geodiversity, SA objective 6: Landscape and townscape, SA objective 7: Heritage and SA objective 9: Soils**. Negative effects may be particularly significant under Option 2 given the higher amount of growth associated with that option. There are relatively large areas within the borough that lie within Mineral Safeguarding Areas and as a result there is potential for strategic growth to limit access to mineral deposits in some locations. Therefore, a minor negative effect is identified for both options in relation to **SA objective 13: Material assets and waste**. However, all these effects are uncertain as any negative impacts will depend on the specific location and scale of development, as well as its design and the extent to which mitigation measures are incorporated. Similarly, the land take needed for growth in the borough may contribute to increased flood risk by increasing the amount of impermeable surfaces. This concern may become more prevalent towards the end of the plan period as flooding events are expected to become more severe and frequent due to climate change. An uncertain minor negative effect is therefore identified for Option 1 and Option 2 in relation to **SA objective 8: Water and SA objective 11: Climate change adaptation**.

**4.8** New housing growth in the borough is likely to result in increased transport movements to access workplaces, and services and facilities day -to-day. A significant proportion of these trips are likely to be taken using private car given that a greater percentage of individuals in the borough commute to work using private car when compared to the national average. This is a particular issue in terms of air quality as there are seven AQMAs in the borough. As a result, negative effects are identified for Option 1 and Option 2 in relation to **SA objective 10: Climate change mitigation and SA objective 12: Air quality**. In the case of Option 2, the negative effects identified are potentially significant as going beyond assessed needs has particular potential to cause increased congestion on key routes within the borough. However, both Option 1 and Option 2 are likely to provide investment into sustainable transport improvements within the borough, which may reduce the share of trips that are taken by private car by residents. Minor positive effects are therefore also identified in relation to SA objective 10: Climate change and SA objective 12: Air quality for both Option 1 and Option 2, and both options will have mixed effects, although the negative part of the effect is significant for Option 2.

**4.9** Significant positive effects are likely for both Option 1 and Option 2 in relation to **SA objective 14: housing** as they will

both provide a level of housing to meet identified needs within the borough. For Option 2, there is likely to be a particularly significant positive effect as delivering a higher level of housing supply has more potential to address housing affordability in the plan area and deliver a wider range of homes in terms of sizes, tenure and type to meet the needs of more residents. However, this level of housing delivery would be in excess of what the local housing markets have supported over the past decade, as demonstrated by the Housing Market Delivery Study. Therefore, there is uncertainty attached to this option as there is a question mark around its deliverability.

**4.10** Negligible effects are identified for both Options in relation to **SA objective 4: economic growth** as these Options focus on the quantum of housing and not the quantum of employment development.

## Spatial options

**4.11** Five alternative options are identified in the Regulation 18 Local Plan for the distribution of development within the borough.

### Option 1

- 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.

**4.12** Option 1: This Option seeks to focus development in and adjacent to settlements beyond the outer Green Belt boundary and outside of the Areas of Outstanding Natural Beauty, thereby seeking to avoid the need to release any land from the Green Belt as well as avoiding development within a protected landscape.

**4.13** Option 2: This Option has an urban focus. In this instance development would be focused on greenfield and previously-developed land within the urban areas (as identified in Core Strategy Policy CP11) as well as land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities.

**4.14** Option 3: This Option is focused on settlements near the top of the settlement hierarchy. In this instance development would be focused on greenfield and previously-developed land within the urban areas and rural service centres (as identified in Core Strategy Policies CP11 and CP12), as well as land adjacent to these settlements. This seeks to locate development in areas with good access to existing services and facilities, as well as meeting the needs of a wider range of communities in accessible locations.

**4.15** Option 4: This Option supports a distributed pattern of development across the borough. Development would be focused on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements (as identified in Core Strategy Policies CP11, CP12 and CP13), as well as land adjacent to these settlements. The Option seeks to maximise the use of previously-developed land in the borough, as well as supporting a wide range of communities.

**4.16** Option 5: This Option considers the potential for a new settlement/s in the borough. Development would be focused on greenfield and previously-developed land within the urban areas, rural service centres and other rural settlements (as identified in Core Strategy Policies CP11, CP12 and CP13), thereby seeking to maximise the use of previously-developed land in the borough, as well as a new settlement/s remote from existing towns and villages.

**4.17** Development should seek to balance the need to support sustainable patterns of growth with the need to protect natural and heritage assets as far as possible, and ensure the necessary supporting infrastructure is in place in a timely fashion.

**4.18** There are two Housing Market Areas (HMAs<sup>10</sup>) that exert an influence across the borough. Within these HMAs there is a significant amount of self-containment in terms of the movement of people and activity on a regular basis, eg commuting to and from work or travelling to services and

shops. A sustainable pattern of development should seek to address the need where it arises, i.e. within each HMA.

**4.19** To date, the Council has endeavored to make best use of previously-developed land in built up areas such as Tonbridge for many years. However, and as a consequence, these types of sites are becoming less common. Therefore, the Council believes that it will need to consider the use of greenfield sites, within and beyond existing built-up areas to meet its objectively assessed need.

**4.20** Tonbridge and Malling borough includes a diverse range of settlements. This includes built-up urban areas such as Tonbridge, large rural service centres including West Malling and Borough Green, as well as many smaller villages. Settlements at the top of the hierarchy, i.e. urban areas, contain an array of services including schools, shops and healthcare, and are well connected in terms of public transport and opportunities for active travel such as cycling and walking to destinations. Settlements further down the hierarchy, are smaller in size and have limited services or are remote from places with services, such as the urban areas and the rural service centres. The settlement hierarchy has been used to inform the spatial strategy options.

**4.21** Having regard to the objective of meeting assessed need, the constraints in the borough, the influences of two HMAs, making best use of previously-developed land, the range and character of existing communities and settlements, as well as the pool of sites under consideration, five spatial strategy options have been assessed. The Council considers that the spectrum of options is sufficiently broad, and the options sufficiently distinct, to allow for meaningful comparisons to be made.

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<sup>10</sup> Sevenoaks/Tonbridge/Tunbridge Wells HMA; and the Maidstone HMA.

Table 4.2: Summary of SA findings for the Spatial Options

SA Objective	Option 1	Option 2	Option 3	Option 4	Option 5
1: To improve human health and well-being	+	+	+	+/-	+/-
2: To improve equality and access to community facilities and services	+	+	+	+/-	+/-
3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society	+	+	+	+/-	+/-
4: To encourage sustainable economic growth, business development, end economic inclusion across the borough	++/-	++	++	++/-	++/-
5: To protect and enhance biodiversity and geodiversity	-?	-?	-?	--?	--?
6: To protect and enhance the borough's landscape and townscape character and quality	-?	--?	--?	--?	--?
7: To protect and enhance the cultural heritage resource	-?	-?	-?	--?	--?
8: To protect and enhance the quality of water features and resources	-?	-?	-?	-?	-?
9: To conserve and enhance soil resources and guard against land contamination	--?	--/+?	--?	--?	--?
10: To reduce greenhouse gas emissions so as to minimise climate change	+/-	+/-	+/-	--/+	--/+
11: To improve adaptation to climate change so as to minimise its impact	-?	-?	-?	-?	-?
12: To protect and improve air quality	+/-?	+/-?	+/-?	--/+?	--/+?
13: To protect material assets and minimise waste	-?	-?	-?	-?	-?
14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures	++/-	++	++	++	++

**4.22** Options 2 and 3 direct development towards the urban areas and rural service centres within the borough respectively where there is a wider range of key services and facilities. This is likely to provide residents within new developments with opportunities to satisfy every day needs and access healthcare and education facilities within a relatively short distance. As such, minor positive effects are identified for Options 2 and 3 in relation to **SA objective 1: Health, SA objective 2: Services and facilities** and **SA objective 3: Education**. As Option 1 directs development to the northeast of the borough, in the proximity of larger settlements and urban areas like the Medway Gap and Snodland, and Chatham and Maidstone just outside the borough, there is potential for this growth strategy to also provide residents with good access to key services and facilities. As a result, minor positive effects are also identified for Option 1 in relation to SA objectives 1, 2 and 3. Options 4

and 5 also set out that growth will be directed to the urban areas and rural service centres and therefore minor positive effects are identified for these strategy options in relation to SA objectives 1, 2 and 3. However, these strategy options will also focus growth to other rural settlements in the borough, which may result in some residents having poorer access to key services and facilities. As a result, minor negative effects are also identified for Options 4 and 5 in relation to SA objectives 1, 2 and 3.

**4.23** The impacts of new growth in the borough relating to reducing the need to travel, encouraging modal shift and reducing congestion will depend largely on the location of new development in relation to sustainable transport links, services and facilities and employment land. With all the growth strategies, there is potential for new development to cause increased congestion on key routes in the borough, which is a

particular concern given that there is already a strong reliance on private car travel. Furthermore, the borough contains a number of AQMAs and all the growth strategies direct development to locations where development could further exacerbate air quality issues. As such, negative effects are identified for all of the options in relation to **SA objective 10: climate change mitigation** and **SA objective 12: air quality**. In the case of Option 4 and Option 5, the negative effects identified are significant as they will direct some growth towards other rural settlements and new settlements in the borough where there is lower service and facility provision, which is likely to encourage private car travel. Minor positive effects are also identified for all the strategy options in relation to SA objective 10 and 12 as they all include larger settlements like Leybourne, where residents will have a reduced need to travel to access services and facilities and will have access to sustainable transport links. In all cases, the effects identified are uncertain as they will be dependent on the exact location of new development.

**4.24** In terms of environmental impacts, all strategy options are expected to have negative effects given they are likely to require significant land take on greenfield land in some cases, which will cause habitat loss and impacts to landscape character. Specifically, there are SSSIs (Wouldham to Detling Escarpment, Holborough to Burham Marshes, Houlder and Monarch Hill Pits, Upper Harling) and SACs (North Downs Woodlands and Peters Pit) in the northeast of the borough which could be impacted by all the growth strategies. As such, at least minor negative effects are identified for all the strategy options in relation to **SA objective 5: Biodiversity and geodiversity**. In the case of Options 4 and 5, the inclusion of development within smaller rural settlements and new settlements for the latter is likely to increase the share of greenfield land and therefore potential habitat loss that development may cause. As a result, the negative effects identified for these options in relation to SA objective 5 are significant.

**4.25** Aside from the expected landscape and townscape impacts that new development can cause, growth strategies 2, 3, 4 and 5 could potentially direct growth towards land that either lies within the Kent Downs AONB or adjacent to it. As such, the increased potential for these growth strategies to adversely impact high value landscape means that significant negative effects are identified for these options in relation to **SA objective 6: Landscape**. In particular, the isolated development that could result from Option 5 could have significant negative landscape effects, depending on the location of any new settlement(s). For Option 1, a minor negative effect is identified in relation to SA objective 6 as there is a specific focus on ensuring that any development is located outside of the AONB, although the scale of new development means that some adverse landscape impacts may still occur. In terms of heritage, minor negative effects are

identified for all of strategy options in relation to **SA objective 7: Heritage** as there is potential for development adjacent to or within any of the settlements to have adverse impacts on the setting of designated heritage assets. For all the biodiversity, landscape and heritage effects identified, there is a degree of uncertainty as effects will be dependent on the exact location, scale and design of any development.

**4.26** The borough is characterised by a high proportion of Grade 3 agricultural land and there are areas of Grade 1 and 2 agricultural land in the northeast of the borough which intersect with areas that could receive growth under all of the options. Therefore, significant negative effects are identified for all of the growth options in relation to **SA objective 9: Soils**. For Option 2, a minor positive effect is also identified in relation to SA objective 9 as the greater focus on the larger urban areas in the borough may encourage a higher share of previously developed land that comes forward for development. All of the strategic options include land in the northeast of the borough that intersects with Mineral Safeguarding Areas. Therefore, minor negative effects are identified for all the growth strategies in relation to **SA objective 13: Material assets and waste**.

**4.27** All options are considered to have minor negative effects in relation to **SA objective 8: Water** and **SA objective 11: Climate change adaptation** as they include land in the northeast of the borough, or within Tonbridge, where there are large areas of Flood Zone 3. These effects are uncertain as they will depend on the exact design, scale, location, and layout of development, which is not known at this stage.

**4.28** All the growth strategy options will deliver housing and employment land within the borough, which will provide a range of housing types and employment opportunities for residents. As a result, significant positive effects are identified for all of the options in relation to **SA objective 4: Economic growth** and **SA objective 14: Housing**. However, it is possible that Option 1 may be too constrained in its focus on growth in the northeast of the borough and within Tonbridge, which may result in a lack of housing and employment provision in other parts of the borough. As such, minor negative effects are also expected for Option 1 in relation to SA objective 4 and SA objective 14. Minor negative effects are also identified for Option 4 and 5 in relation to **SA objective 4: economic growth** as the inclusion of smaller rural settlements within these strategies may result in development coming forward that is poorly connected to the main employment locations.

## The future development of Tonbridge options

**4.29** Two alternative options are identified in the Regulation 18 Local Plan for the future development of Tonbridge.

### Option 1

- Optimise densities on development sites within Tonbridge, particularly on those sites within the town centre, maximising their potential. This would minimise the need for the release of green field sites beyond the outer edge of Tonbridge, in the Green Belt, for development.

### Option 2

- Conservative densities on development sites within Tonbridge, minimising the intensification of the built-up areas. This would increase the need for the release of green field sites at and beyond the outer edge of Tonbridge, in the Green Belt, for development.

**4.30** Tonbridge is the principal town centre for the Borough and the primary focus for the development of town centre uses (residential, retail, leisure, commercial, office, tourism, cultural and community). It features in the top tier of the settlement hierarchy. It is important to recognise the opportunities for change to enable the town to continue to thrive and remain vital.

**4.31** Two reasonable options for the future development of Tonbridge have been identified by the Council. These options set out different approaches to the density of development in the town and what the consequences are. 'Optimise densities' means making the best use of land, taking account of accessibility to local services and the prevailing character.

**Table 4.3: Summary of SA findings for the future development of Tonbridge Options**

SA Objective	Option 1	Option 2
1: To improve human health and well-being	+	+/-
2: To improve equality and access to community facilities and services	+	+/-
3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society	+	+/-
4: To encourage sustainable economic growth, business development, end economic inclusion across the borough	++	+/-
5: To protect and enhance biodiversity and geodiversity	+	-?
6: To protect and enhance the borough's landscape and townscape character and quality	+/-?	+/-?
7: To protect and enhance the cultural heritage resource	-?	+
8: To protect and enhance the quality of water features and resources	+/-	-?
9: To conserve and enhance soil resources and guard against land contamination	++	-?
10: To reduce greenhouse gas emissions so as to minimise climate change	+	-
11: To improve adaptation to climate change so as to minimise its impact	+/-	-
12: To protect and improve air quality	+/-	-
13: To protect material assets and minimise waste	+	-?
14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures	-	+

**4.32** Tonbridge is the main town within the borough, providing access to a wide range of services to facilitate the everyday needs of residents. The approach outlined in Option 1, of optimising densities on development sites within Tonbridge, is likely to provide more new residents with walking distance access to key services and facilities, including healthcare and cultural and leisure related, and educational facilities. As such,

minor positive effects are identified for Option 1 in relation to **SA objective 1: Health, SA objective 2: Services and facilities** and **SA objective 3: Education**. Option 2 aims to minimise the intensification of built-up areas, which may result in development being directed to more remote locations, beyond the outer edge of Tonbridge, within the borough. A significant portion of the borough, particularly the more rural

areas, is characterised by relatively poor access to services and facilities and as a result minor negative effects are identified for Option 2 in relation to SA objectives 1, 2 and 3. Whilst the emphasis of Option 2 is not on densification of the urban area of Tonbridge, it would still deliver some conservative growth in this area. In addition, more dispersed development may help to avoid services and facilities within central Tonbridge becoming overloaded and therefore mixed minor positive and minor negative effects are likely in relation to SA objectives 1, 2 and 3.

**4.33** Relatively poor access to services and facilities in the rural parts of the borough means that there is a heavy reliance on private car travel. Option 2 may worsen this situation, contributing to increased carbon emissions and poor air quality from private car travel needed to make longer trips in the borough. Therefore, minor negative effects are identified for Option 2 in relation to **SA objective 10: Climate change mitigation** and **SA objective 12: Air quality**. However, there is an AQMA within Tonbridge, as well as AQMAs on main roads that connect to the settlement. Increased densification of development sites within the town could lead to increased congestion in these areas. As a result, a minor negative effect is also identified for Option 1 in relation to SA objective 12. Minor positive effects are also identified for Option 1 in relation to SA objective 10 and 12 as this option has the potential to reduce the need for long trips using private car travel by increasing the level of development that is located within walking distance of a wide range of services and facilities.

**4.34** Increased densification of development sites within Tonbridge, including within the town centre, is likely to support the viability and vitality of Tonbridge as a commercial centre and will provide residents in new development with employment opportunities within walking distance. As such, a significant positive effect is identified for Option 1 in relation to **SA objective 4: Economy**. The converse may potentially occur within Option 2, with less use of the town centre and residents located further away from one of the key employment centres within the borough. However, this Option is still expected to deliver conservative densities of development within Tonbridge, which may contribute to employment opportunities. Therefore, a mixed minor positive and minor negative effect is identified for Option 2 in relation to SA objective 4. In terms of housing, optimising densities on development sites within Tonbridge is likely to deliver higher density development, that may be less desirable, potentially focusing on smaller units and flats. Therefore, Option 1 is expected to have a minor negative effect in relation to **SA objective 14: Housing**. Whereas, Option 2 is expected to have a minor positive effect, as it is more likely to deliver higher quality housing with a mix of sizes, types and tenures, that doesn't focus too much housing in one area.

**4.35** New development within the borough has the potential to have adverse impacts on biodiversity and landscape

character, including the setting of the High Wealds AONB and Kent Downs AONB. With Option 2, there may be more development in rural locations which have a higher concentration of valuable habitats or are in closer proximity to biodiversity and landscape designations. As such, minor negative effects are identified for Option 2 in relation to **SA objective 5: Biodiversity** and **SA objective 6: Landscape**. In the case of Option 1, a focus on development within the existing urban area of Tonbridge may reduce some landscape and habitat impacts that would otherwise occur on greenfield sites. Minor positive effects are therefore identified for Option 1 in relation to SA objectives 5 and 6. However, a significant level of development within Tonbridge may cause disruption to the existing townscape character and the setting of designated heritage assets within the town. As such, a minor negative effect is also expected for Option 1 in relation SA objective 6 and a minor negative effect is expected for this option in relation to **SA objective 7: Heritage**. Conversely, more conservative development densities within Tonbridge may reduce impacts on townscape and heritage assets and therefore minor positive effects are identified for Option 2 to in relation to SA objectives 6 and 7.

**4.36** In general, development of greenfield land over land within built-up areas is more likely to increase flood risk given that it will increase the level of impermeable surfaces in an area. As such, a minor negative effect is identified for Option 2 and a minor positive effect is identified for Option 1 in relation to **SA objective 8: Water**. However, there are large areas of Flood Zone 3 within Tonbridge, which means that the urban densification approach set out in Option 1 could give rise to increased flood risk. This may be of particular concern given that climate change is likely to increase the frequency of extreme weather events in the coming decades that may cause increased flooding. As a result, minor negative effects are identified for Option 1 in relation to SA objective 8 and **SA objective 11: Climate change adaptation**.

**4.37** Option 1 directs increased development to the built-up area of Tonbridge, which may encourage the use of previously developed land and less high quality agricultural land. As such, a significant positive effect is identified for Option 1 in relation to **SA objective 9: Soils**. Option 2 may encourage an increased focus on greenfield land outside of the urban area and therefore a minor negative effect is identified in relation to SA objective 9. Similarly, development within the built-up area that is encouraged through Option 1 may result in less development being directed to locations that are within Mineral Safeguarding Areas. As a result, a minor positive effect is identified for Option 1 in relation to **SA objective 13: Material assets**. Conversely, Option 2 may cause greater levels of development to be directed to more rural areas within Mineral Safeguarding Areas. As such, a minor negative effect is identified for this option in relation to SA objective 13. This effect is uncertain as it will be dependent on the exact design,

scale, location, and layout of development, which is not known at this stage.

### Options to prevent merging of settlements in the North East of the borough

**4.38** Three alternative options are identified in the Regulation 18 Local Plan for preventing merging of settlements in the North East of the borough.

#### Option 1

- Extend the outer edge of the Green Belt

#### Option 2

- An anti-coalescence/strategic gap policy

#### Option 3

- No change to the existing Green Belt boundary and no gap policy.

**4.39** That part of the borough falling within the West Kent HMA is entirely covered by the Green Belt, except for defined settlements set within it, e.g. Tonbridge. However, only part of the Maidstone HMA is covered by Green Belt. The north-east part of the borough falls outside of this designation, and the settlements within this area have been under particular pressure from development.

**4.40** As part of the Local Plan process, options for preventing the coalescence of the settlements in this location, as well as preserving the setting of historic places and heritage assets such as St Mary's Abbey, in the context of the development pressures arising from the assessed needs should be assessed. Three reasonable alternative options have been identified by the Council, as set out above.

**Table 4.4: Table 4.5: Summary of SA findings for the Options to prevent merging of settlements in the North East of the borough**

SA Objective	Option 1	Option 2	Option 3
1: To improve human health and well-being	0	0	0
2: To improve equality and access to community facilities and services	0	0	0
3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society	0	0	0
4: To encourage sustainable economic growth, business development, end economic inclusion across the borough	-?	-?	+
5: To protect and enhance biodiversity and geodiversity	+	+	-?
6: To protect and enhance the borough's landscape and townscape character and quality	+	+	-?
7: To protect and enhance the cultural heritage resource	+	+	-?
8: To protect and enhance the quality of water features and resources	0	0	0
9: To conserve and enhance soil resources and guard against land contamination	+	+	-?
10: To reduce greenhouse gas emissions so as to minimise climate change	0	0	0
11: To improve adaptation to climate change so as to minimise its impact	0	0	0
12: To protect and improve air quality	0	0	0
13: To protect material assets and minimise waste	0	0	0
14: To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures	-?	-?	+

**4.41** Extension of the Green Belt boundary or the introduction of an anti-coalescence/strategic gap policy, as set out in Options 1 and 2, is likely to restrict some land between West Malling, East Malling and Kings Hill coming forward to meet the housing and employment needs of the borough. As such, minor negative effects are identified for Option 1 and Option 2 in relation to **SA objective 4: Economic growth** and **SA objective 14: Housing**. Conversely, under Option 3 land within this area is more likely to contribute to meeting housing and employment needs within Tonbridge and Malling and therefore minor positive effects are identified for these options in relation to SA objectives 4 and 14. The effects identified are uncertain as they will be dependent on whether sites for development are allocated in this area.

**4.42** Although land between Kings Hill, West Malling and East Malling does not contain local or national biodiversity designations, it is largely characterised by greenfield land. As such, Option 1 and Option 2 may offer some protection to this land from development, reducing the potential for habitat loss and degradation and species disturbance. Minor positive effects are therefore identified for these options in relation to **SA objective 5: Biodiversity**. Similarly, whilst there are no landscape designations within the area concerned, Option 1 and Option 2 would preserve separation between Kings Hill, West Malling and East Malling, which would protect the existing landscape setting and character of these settlements. As a result, minor positive effects are identified for Option 1 and Option 2 in relation to **SA objective 6: Landscape**. Additionally, both West Malling and East Malling contain a number of listed buildings within Conservation Areas. Option 1 and Option 2 may contribute to protecting the historic landscape setting of these heritage assets from development. Therefore, minor positive effects are also identified for these options in relation to **SA objective 7: Heritage**. Option 3 is more likely to result in development coming forward within this area and therefore minor negative effects are identified in relation to SA objective 7 due to the presence of heritage designations in the area which could be adversely impacted. Minor negative effects are also identified for Option 3 in relation to SA objective 5 and 6 as development in this area as a result of no policy intervention could cause habitat degradation and alteration of landscape character. All potential adverse effects identified are uncertain as they will be dependent on the exact design, scale, location, and layout of development, which is not known at this stage.

**4.43** Land between Kings Hill, West Malling and East Malling contains a high proportion of Grade 2 agricultural land which may be afforded some protection from development pressures under Option 1 and Option 2. Minor positive effects are therefore identified for Option 1 and Option 2 in relation to **SA objective 9: Soils**. Option 3 may make it more likely that development comes forward in this area, resulting in the loss of high quality agricultural land. Therefore, minor negative

effects are identified for Option 3 in relation to **SA objective 9: Soils**. These effects are uncertain as they will be dependent on the exact design, scale, location, and layout of development, which is not known at this stage.

**4.44** Negligible effects are identified for all three Options in relation to the remaining SA objectives due to the specific focus of these Options on preventing the merging of settlements.

## 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 allocation in the Tonbridge and Malling Local Plan. A total of 248 residential sites, 21 employment sites, and 78 mixed use sites have been appraised.

**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.

**5.3** The detailed SA site proformas for each of the reasonable alternative site options can be found in the separate Annex 1 to this SA Report.

### SA Objective 1: To improve human health and well-being

**5.4** All residential and mixed used sites have scored positively in relation to their location 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, including a number of specialist support groups, 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 Right of Way (PRoW) network. This allows access to a wider 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 111 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 the exact scale, layout and design of development and whether these existing features are in fact lost to new development.

**5.5** Minor positive effects are expected at 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.

### **SA Objective 2: To improve equality and access to community facilities and services**

**5.6** The development site options have been assessed by TMBC for accessibility to local services (including: transport infrastructure, education facilities, health care facilities and essential services) using accessible walking distances. Sites have also been assessed on their location, with sites within settlements placing higher in the settlement hierarchy being considered more accessible. Sites have then been given an overall accessibility score, which has been determined by applying a scoring matrix to each element of accessibility. Depending on how sites have scored has then placed them within an accessibility band or either Poor, Fair, Good, Very Good or Excellent depending on their accessibility to local services.

**5.7** Out of the residential site options, 63 are expected to have significant negative effects as they are within the Poor Accessibility Band, and the remaining site options vary in their expected effects on SA Objective 2, ranging from 20 sites expected to have significant positive effects (Excellent Accessibility), 51 sites expected to have minor positive effects (Very Good Accessibility), 29 sites expected to have negligible effects (Good Accessibility), and 87 sites expected to have minor negative effects (Fair Accessibility).

**5.8** The majority of mixed use site options are expected to score negatively against this SA objective. 25 site options are expected to have significant negative effects as they are within the Poor Accessibility Band, and 42 are expected to have minor negative effects as they are within the Fair Accessibility Band. Only two mixed use sites (Site ID 59796, 59815) are expected to have significant positive effects (Excellent Accessibility) on this SA Objective.

**5.9** While access to services and facilities is perhaps more significant for residential sites 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, fourteen of the employment site options are expected to have significant negative effects on SA Objective 2 as they are within the Poor Accessibility Band.

**5.10** It is noted, however, that larger scale development site options could potentially incorporate the provision of new community facilities and services.

**5.11** If any of the sites with potential significant negative effects are taken forwards for allocation in the Local Plan it is recommended that consideration is given to whether

**the provision of new facilities and/or services can be incorporated.**

### **SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society**

**5.12** The majority of the residential and mixed use site options are expected to score positively against SA Objective 3. 56 residential site options and 17 mixed use site options are expected to have significant positive effects on this SA Objective, as these site options are located within 800m of both an existing secondary school and a primary school. A further 139 residential site options and 41 mixed use site options are expected to have minor positive effects since these site options are within 800m of either an existing secondary school or a primary school, but not both. Minor negative effects are expected for 53 residential site options and 20 mixed use site options, as these site options are located more than 800m of an existing secondary school and a primary school. However, uncertainty exists as the effects will depend on there being capacity available at those facilities to accommodate new pupils. It is also noted that the provision of new residential development could stimulate the provision of new schools and/or school places, however this cannot be assumed at this stage and is therefore uncertain.

**5.13** 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, and economic inclusion across the borough**

**5.14** The location of residential sites will not directly influence sustainable economic growth or the delivery of employment opportunities. Therefore, negligible effects are expected for these site options.

**5.15** All 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, 25 are expected to have significant positive effects on this SA Objective as these site options are within 800m of a railway station. A further 58 site options are expected to have minor positive effects as these site options are within 400m of a bus stop and/or cycle path

(but more than 800m from a railway station), and 13 site options are expected to have negligible effects as these site options are located more than 800m from a railway station and 400m of a bus stop.

### SA Objective 5: To protect and enhance biodiversity and geodiversity

**5.16** Tonbridge and Malling has a range of locations identified for their environmental sensitivity, including two Special Areas of Conservation (SAC), 11 Sites of Special Scientific Interest (SSSIs) and 48 Local Wildlife Sites. This distribution, together with the locations of the reasonable alternative site options, has resulted in the majority of residential, employment and mixed use sites having likely negative effects on SA Objective 5. This is because the majority of site options are within 250m of one or more internationally or nationally designated biodiversity or geodiversity sites, or within 250m of a locally designated site. Of the site options, only 11 residential sites and three mixed use site options are expected to have a negligible effect on this objective, as these sites are either located more than 1km from any internationally or nationally designated biodiversity or geodiversity sites, or they are over 250m from a locally designated site.

**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.

**5.18** 247 of the site options are expected to have significant negative effects as the site options contain an existing green infrastructure asset that could be lost as a result of new development. These effects are uncertain, as it may be possible to conserve or even enhance the asset through the design and layout of the new development. **If any of these sites are allocated in the Local Plan, it is recommended that consideration is given to whether these assets can be conserved or enhanced as part of the proposed new development, or whether alternative provision can be made nearby.**

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

**5.19** All development could have some effect on the landscape depending on the character and sensitivity of the surrounding area. All but two of the employment site options (Site IDs 59694 and 59892) are expected to have significant negative effects on this objective since these sites are not located near any settlements, in rural locations and/or would

result in the loss of designated open spaces. This is similar to the mixed use site options, which are also expected to have predominantly significant negative effects. For employment site options 59694 and 59892, negligible effects are expected as both site options are located within a settlement.

**5.20** The residential site options are more varied in their expected effects on SA Objective 6. 183 residential site options are expected to have significant negative effects as they are not located near any settlements, in rural locations and/or would result in the loss of designated open spaces. A further 29 residential site options are expected to have minor negative effects, and 36 are expected to have negligible effects as they are located within a settlement.

**5.21** 92 of the residential, employment and mixed use site options are expected to have significant negative effects as they are within 500m of the Kent Downs or High Weald AONBs and could therefore have adverse impacts on those designated landscapes and their settings.

**5.22** However, all negative effects are uncertain at this stage as the effects on landscapes and townscapes will depend on the design, scale and layout of development, which may help mitigate any adverse effects. **If any sites with potential significant negative effects are taken forwards for allocation in the Local Plan, it is recommended that mitigation requirements are built into the associated site allocation policies.**

**5.23** TMBC is considering commissioning evidence to better understand the potential landscape impact of possible future strategic scale allocations, and to inform site specific policies. Any future landscape assessment will feed into the ongoing SA process and will inform and refine the site assessments.

### SA Objective 7: To protect and enhance the cultural heritage resource

**5.24** 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. There is potential for all site options to have potential negative effects on SA Objective 7 as all are located within 250m – 1km of a heritage feature and therefore have the potential to affect their setting and contribution to local character and distinctiveness. All employment and mixed use site options (with the exception of Site ID 59846), in addition to 237 residential site options, have potential significant negative effects since these sites are located within 250m of a designated heritage feature. The remaining mixed use sites and 11 residential site options could have a minor negative effect on SA objective 7 since these site options are located between 250m-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.

**5.25 If any sites with potential significant negative effects on heritage are taken forwards for allocation in the Local Plan, it is recommended that further consideration is given to whether 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.**

**5.26** TMBC has commissioned a Heritage Strategy to better understand assets in the borough and promote a positive strategy for the conservation and enjoyment of the historic environment. This assessment will feed into the ongoing SA process and will inform and refine the site assessments when it is available.

### **SA Objective 8: To protect and enhance the quality of water features and resources**

**5.27** 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 significant 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. 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.

**5.28** While 83 sites are expected to have negligible effects overall, the remainder are expected to have at least minor negative effects. 66 of the development site options are expected to have significant negative effects overall 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 they contain a water body or water course, or fall within or partially within a 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. The majority of the remaining significant negative effects identified relate to 96 of the development site options, 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.

**5.29 If any of the sites with potential significant negative effects associated with flood risk are 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**

**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.**

### **SA Objective 9: To conserve and enhance soil resources and guard against land contamination**

**5.30** Most of the borough is rural in character with approximately 71% covered by the Metropolitan Green Belt and most of the borough classed as agricultural land, with the majority classified as Grade 3 Agricultural Land Classification (ALC). As a result, many of the development site options are expected to have negative effects on SA Objective 9. 116 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 and/or Grade 2 agricultural land which would be lost to development. A further 94 of the development site options may have significant negative effects as they are also greenfield sites which contain a significant proportion of ( $\geq 25\%$ ) Grade 3 agricultural land. However, these effects are uncertain as the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality). Effects relating to the loss of high quality soils would be long term and permanent and cannot be mitigated.

**5.31** However, 90 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.

### **SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change**

**5.32** The majority of the development site options are expected to score positively against SA Objective 10, with 99 site options expected to have significant positive effects as they are within 800m of a railway station. 54 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 improve adaptation to climate change so as to minimise its impact

5.33 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 protect and improve air quality

5.34 The main source of air pollution in the borough is road traffic from the main A roads and the M20. Consequently, there are seven Air Quality Management Areas (AQMA) relating to emissions from motor vehicles. The AQMA are small, focused areas and this is demonstrated by how only 14 residential site options and three mixed use site options are expected to have significant negative effects on SA Objective 12, as they are within 100m of an AQMA. All other development site options are not within 100m of an AQMA and therefore expected to have negligible effects on this SA Objective. **If any of the sites close to AQMAs 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

5.35 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, a total of 229 of the development site options are expected to have minor negative effects on SA Objective 13 as they are located within a Mineral 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.

5.36 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.

5.37 The remaining 118 development site options do not fall within a Mineral 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 appropriate mix of sizes, types and tenures

5.38 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. 66 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 good contribution towards the total local housing needs.

5.39 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. However, the extent of the positive effects mixed use sites could have on SA Objective 14 are not currently known, as the capacity split of residential and employment land for mixed use sites is not currently available. This information will inform the appraisal of mixed use sites at the next stage of consultation. As a minimum all mixed use sites are expected to have minor positive effects.

5.40 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

5.41 In terms of the least sustainable site options, looking across the suite of SA Objectives, there are 18 residential site options, four employment site options, and seven mixed use site options that stand out as being less sustainable than other site options, as they are expected to have significant negative effects across at least six different SA Objectives. These site options are as follows:

- **Residential site options:** Site ID 59637, 59653, 59669, 59691, 59747, 59749, 59763, 59766, 59783, 59798, 59799, 59800, 59802, 59806, 59811, 59818, 59827, 59839.
- **Employment site options:** Site ID 59772, 59788, 59828, 59848.
- **Mixed use site options:** Site ID 59650, 59665, 59675, 59690, 59742, 59801, 59846.

5.42 If any of these site options are taken forward in the Local Plan, particular consideration should be given to mitigation.

5.43 In terms of the most sustainable site options, looking across the suite of SA Objectives, there are two residential site options (Site ID 59878, 59879) and two mixed use site

options (Site ID 59796, 59815) that stand out as being more sustainable than others, as they are expected to have significant positive effects across at least six different SA Objectives. In terms of employment site options, there are three sites (Site ID 59727, 59856, 59892) 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.

Table 5.1: Residential Site Options

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59390	++	0	+?	0	--?	--?	--?	--?	--	++	0	0	-?	+
59391	++	+	+?	0	--?	0	--?	--/0	-	++	0	0	-?	+
59392	+	+	++?	0	-?	0	--?	--?	++	++	0	0	-?	+
59393	++	0	+?	0	--?	0	--?	0/--?	-	+	0	--	-?	+
59397	+/--?	+	++?	0	--?	--?	--?	0/--?	-	+	0	--	-?	+
59398	+/--?	+	++?	0	--?	--?	--?	--?	-	++	0	--	-?	+
59399	++	+	++?	0	-?	0	--?	-/0	++	++	0	0	-?	+
59406	+	-	+?	0	--?	0	--?	0	++	-	0	0	-?	+
59407	++	+	+?	0	--?	--?	--?	0/--?	++	++	0	0	-?	+
59410	++	-	++?	0	-?	-?	--?	--/0	--?	-	0	0	-?	+
59417	+/--?	-	+?	0	--?	--?	--?	--?	-	+	0	0	-?	+
59424	+	0	+?	0	--?	0	--?	0	-	+	0	0	-?	++
59425	++	0	+?	0	--?	--?	--?	-?	--	+	0	0	-?	++
59428	++	++	++?	0	--?	0	--?	--/0	-	++	0	0	0	+
59432	+/--?	+	+?	0	--?	--?	-?	--?	--?	+	0	0	-?	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59433	++/--?	+	+?	0	--?	--?	--?	--?	--?	+	0	0	-?	+
59436	+/--?	+	+?	0	-?	--?	--?	0/--?	--?	+	0	0	0	+
59437	++/--?	+	+?	0	--?	--?	--?	0/--?	++	+	0	0	-?	+
59438	+	+	-?	0	-?	0	--?	--?	-	++	0	0	-?	+
59441	+/--?	+	+?	0	--?	--?	--?	--?	--?	+	0	0	-?	+
59442	+/--?	+	+?	0	-?	--?	--?	--?	--?	+	0	0	-?	+
59443	+/--?	+	+?	0	--?	--?	--?	--?	--	+	0	0	-?	+
59445	+/--?	+	+?	0	--?	--?	--?	--?	--	+	0	0	-?	+
59447	++	+	+?	0	-?	0	--?	--/0	++	++	0	0	-?	+
59448	++/--?	+	+?	0	--?	--?	--?	0/--?	--	+	0	0	0	+
59449	++/--?	+	+++?	0	0?	--?	--?	0/--?	-	+	0	0	0	+
59450	++/--?	++	+?	0	--?	--?	--?	-?	-	+	0	--	0	+
59456	++/--?	+	+?	0	-?	--?	-?	-?	--	+	0	0	-?	+
59457	++	++	+?	0	0?	0	--?	0/--?	++	+	0	--	-?	+
59460	++/--?	+	+?	0	--?	--?	--?	--?	-	+	0	--	-?	+
59464	++	++	+++?	0	-?	0	--?	0	-	++	0	--	0	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59469	++/--?	+	++?	0	--?	--?	--?	--/0	-	++	0	0	-?	+
59472	++	+	-?	0	--?	0	--?	-/0	-	+	0	--	-?	+
59488	++	+	+?	0	-?	0	--?	0	++	++	0	0	-?	+
59489	++/--?	+	+?	0	--?	--?	--?	0/--?	--?	++	0	0	-?	+
59492	++	+	+?	0	-?	--?	--?	0/--?	++	++	0	--	-?	+
59493	++	+	+?	0	-?	--?	--?	0/--?	++	++	0	--	-?	+
59494	+/--?	+	-?	0	--?	--?	-?	-?	-	++	0	0	-?	+
59502	++	++	++?	0	-?	0	--?	-/0	--?	++	0	0	0	+
59505	++	++	++?	0	-?	0	--?	0	++	++	0	0	0	+
59507	++/--?	+	++?	0	0?	--?	--?	0	--?	+	0	0	-?	+
59509	++/--?	+	+?	0	--?	--?	--?	--/0	--	+	0	0	-?	+
59510	++/--?	+	+?	0	-?	--?	--?	-/0	--?	++	0	0	0	+
59511	++/--?	+	+?	0	-?	--?	--?	0	--?	++	0	0	0	+
59512	+	+	+?	0	--?	0	--?	--/0	-	++	0	0	-?	+
59515	+/--?	+	++?	0	-?	--?	--?	0	-	+	0	0	0	+
59516	+/--?	+	++?	0	--?	--?	--?	-/0	-	+	0	0	0	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59521	+/--?	+	++?	0	--?	--?	-?	--/0	-	+	0	0	0	+
59522	+/--?	+	++?	0	--?	--?	-?	0	-	+	0	0	0	+
59524	+/--?	+	++?	0	--?	--?	--?	--/0	-	+	0	0	-?	+
59525	+/--?	+	+?	0	-?	--?	--?	--/0	--	+	0	0	0	+
59531	+/--?	+	+?	0	-?	--?	--?	0	-	+	0	0	-?	+
59534	+/--?	+	+?	0	-?	--?	--?	-/0	-	+	0	0	-?	+
59544	+	+	+?	0	--?	0	--?	-/0	-	+	0	0	-?	+
59547	+/--?	+	+?	0	--?	--?	--?	0	-	+	0	0	-?	+
59550	+/--?	0	++?	0	--?	--?	--?	0	--?	+	0	0	-?	+
59552	+/--?	0	++?	0	-?	--?	--?	0	-	+	0	0	-?	+
59553	++/--?	+	++?	0	--?	--?	--?	0	-	+	0	0	0	+
59554	++/--?	+	++?	0	-?	--?	--?	0	-	+	0	0	0	+
59555	++/--?	+	++?	0	-?	--?	--?	-/0	-	+	0	0	0	+
59559	++	++	++?	0	0?	0	--?	--?	++	++	0	0	0	+
59560	++	++	++?	0	--?	0	--?	--?	++	++	0	0	0	+
59561	++/--?	++	++?	0	--?	0	--?	--?	++	++	0	0	0	++

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59562	++	++	++?	0	0?	0	--?	--?	++	++	0	0	0	+
59563	++/--?	++	++?	0	--?	0	--?	--?	++	++	0	0	0	+
59568	++	++	++?	0	-?	0	--?	--?	++	++	0	0	0	+
59571	+/--?	+	++?	0	-?	--?	-?	0	-	+	0	0	-?	+
59572	+/--?	+	++?	0	--?	--?	--?	--?	--?	+	0	0	0	+
59576	++	++	++?	0	-?	0	--?	-?	++	++	0	0	-?	+
59581	++	++	++?	0	0?	0	--?	--?	++	++	0	--	0	+
59586	++	++	+?	0	--?	0	--?	0/--?	-	++	0	0	0	+
59587	++	++	+?	0	--?	0	--?	0/--?	++	+	0	0	0	+
59588	++/--?	++	+?	0	--?	--?	--?	0/--?	++	++	0	0	0	+
59591	++	+	+?	0	0?	0	--?	0	-	+	0	0	0	+
59592	++	-	+?	0	--?	--?	--?	--/0	--?	+	0	0	0	+
59594	++	--	-?	0	--?	--?	--?	0	--	+	0	0	-?	+
59595	+	--	-?	0	--?	--?	--?	0	++	-	0	0	0	+
59596	+	--	+?	0	--?	-?	--?	--/0	-	-	0	0	-?	+
59597	+	-	+?	0	--?	--?	--?	0	++	+	0	0	-?	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59598	+	--	+?	0	--?	--?	--?	0	--	-	0	0	-?	+
59601	++	0	++?	0	--?	-?	--?	--?	--?	+	0	0	-?	+
59602	+	--	+?	0	--?	--?	--?	0	--	+	0	0	-?	+
59604	+	--	-?	0	--?	--?	--?	0	--?	+	0	0	-?	+
59605	+	--	-?	0	-?	--?	--?	0	--?	+	0	0	0	+
59607	+	-	-?	0	--?	--?	--?	--/0	++	+	0	0	0	+
59608	+	--	-?	0	--?	--?	--?	0/-?	++	+	0	0	-?	+
59609	+	-	++?	0	--?	--?	-?	--?	++	+	0	0	0	+
59610	+	-	-?	0	--?	--?	--?	0/-?	++	+	0	0	-?	+
59612	+/-?	-	++?	0	--?	--?	-?	--?	++	+	0	0	-?	++
59613	+	-	+?	0	--?	-?	--?	--/0	++	+	0	0	0	++
59615	++	-	+?	0	--?	--?	--?	--/0	--?	+	0	0	0	+
59617	+	--	+?	0	--?	-?	--?	0/-?	--	-	0	0	-?	+
59618	+	--	-?	0	--?	--?	--?	-?	--	+	0	0	0	+
59619	++/--?	-	+?	0	--?	--?	--?	-/0	--	-	0	0	-?	+
59620	++/--?	-	+?	0	--?	--?	--?	-/0	--	-	0	0	-?	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59621	+	-	+?	0	--?	--?	--?	0	--	-	0	0	-?	+
59622	++	-	+?	0	-?	--?	--?	0	--	-	0	0	-?	+
59623	++	+	+?	0	0?	0	--?	0	++	+	0	0	0	+
59624	+	--	-?	0	--?	--?	--?	0	--	+	0	0	-?	++
59625	+	-	+++?	0	--?	--?	-?	--?	++	+	0	0	0	+
59627	+	--	-?	0	--?	--?	--?	--?	-	+	0	0	0	+
59628	+/--?	-	-?	0	-?	--?	--?	0/--?	--?	+	0	0	-?	+
59629	+	-	-?	0	--?	--?	--?	--/0	--	+	0	0	0	+
59631	+	--	+?	0	--?	--?	--?	0/--?	--	-	0	0	-?	++
59632	+	-	+?	0	-?	--?	--?	0/--?	--?	+	0	0	-?	+
59633	+	--	-?	0	--?	--?	--?	0	--?	+	0	0	0	+
59634	+	-	+?	0	--?	-?	--?	--/0	++	+	0	0	-?	++
59635	++	0	+?	0	0?	-?	--?	0	--	+	0	0	0	+
59636	+	-	+++?	0	--?	--?	--?	-?	--	++	0	0	-?	++
59637	++/--?	--	+?	0	--?	--?	--?	--/0	--	+	0	0	-?	++
59638	++	0	+?	0	--?	--?	--?	--?	--	+	0	0	0	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59639	+	--	+?	0	-?	--?	--?	0	--	-	0	0	0	+
59640	+	--	+?	0	-?	--?	--?	0	--	-	0	0	0	+
59641	+	--	-?	0	-?	--?	--?	--?	--?	0	0	0	0	+
59644	+	-	-?	0	--?	-?	--?	--?	-	+	0	0	-?	+
59645	++	-	+?	0	--?	--?	--?	0	--?	+	0	0	-?	+
59647	++	0	+?	0	-?	-?	--?	--/0	--	+	0	0	0	++
59648	+	--	-?	0	--?	--?	--?	0	++	-	0	0	-?	+
59649	+	--	+?	0	--?	--?	--?	0	++	-	0	0	-?	+
59653	++/--?	--	+?	0	--?	--?	--?	--/0	--?	++	0	0	0	++
59654	++	-	+?	0	--?	-?	--?	0/-?	--	++	0	--	-?	+
59655	+	-	+?	0	--?	-?	--?	0/-?	--	+	0	0	-?	++
59656	++	0	+?	0	--?	--?	--?	--/0	--?	+	0	0	0	++
59657	+	0	-?	0	--?	--?	--?	0	-	+	0	0	-?	+
59658	++	0	+?	0	--?	0	--?	0	++	+	0	0	-?	+
59660	++	++	+++?	0	--?	0	--?	--?	++	++	0	0	0	++
59664	++	-	+?	0	-?	-?	--?	0/-?	--	++	0	0	-?	+

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59669	+/-?	--	+	0	--?	--?	--?	-/0	--?	++	0	0	-?	++
59671	+	--	-?	0	-?	--?	--?	0/-?	--?	-	0	0	0	+
59672	++	-	+	0	-?	0	--?	0	++	+	0	0	-?	+
59673	+	0	++?	0	0?	0	--?	--?	++	++	0	0	0	+
59677	+	--	-?	0	--?	--?	--?	0	--	-	0	0	-?	+
59686	++	0	+	0	-?	-?	--?	-/0	--	+	0	0	0	+
59691	+	--	-?	0	--?	--?	--?	--?	--?	+	0	0	-?	++
59692	++	-	+	0	--?	-?	--?	--/0	--?	+	0	0	0	+
59693	+	-	+	0	--?	-?	--?	--/0	--	+	0	0	0	++
59695	+	-	++?	0	--?	--?	--?	--?	--?	+	0	0	-?	++
59696	++	-	++?	0	--?	--?	--?	-/0	-	+	0	0	-?	+
59698	+	-	++?	0	-?	--?	--?	0	--	++	0	0	-?	+
59700	++	-	+	0	--?	-?	--?	0	--	++	0	0	-?	+
59703	+	--	+	0	--?	-?	--?	0/-?	--	-	0	0	-?	+
59704	+	-	-?	0	--?	--?	--?	-/0	--?	++	0	0	0	+
59707	+	-	++?	0	-?	--?	--?	--/0/	--	+	0	0	0	++

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59708	+	-	-?	0	-?	--?	--?	0/-?	--	+	0	0	-?	+
59712	+/-?	0	+++	0	--?	--?	--?	--?	++	++	0	0	-?	+
59713	+	-	-?	0	--?	--?	--?	--/0	--	++	0	0	-?	+
59714	++	-	+?	0	--?	-?	--?	--/0	-?	+	0	0	-?	+
59715	+	-	-?	0	--?	--?	--?	0/-?	--	++	0	0	-?	++
59716	++/-?	--	+?	0	--?	--?	--?	0	--	+	0	0	-?	+
59717	+	-	+?	0	--?	-?	--?	0/-?	--?	+	0	0	-?	+
59718	++/-?	+	+?	0	--?	--?	--?	0/-?	-	+	0	0	-?	+
59720	++	-	+?	0	--?	--?	--?	0/-?	--?	+	0	0	-?	++
59721	+	--	+?	0	--?	--?	--?	-/0	--	-	0	0	0	++
59724	+	--	-?	0	--?	--?	-?	0/-?	--	-	0	0	-?	+
59725	+	-	-?	0	--?	--?	--?	--?	++	+	0	0	-?	+
59726	+	--	-?	0	--?	--?	--?	0/-?	--	-	0	0	-?	++
59728	++	-	+?	0	--?	--?	--?	0	--	++	0	0	-?	+
59730	+	-	+?	0	--?	--?	--?	--/0	--?	+	0	0	-?	+
59731	+	-	+++	0	-?	--?	--?	--/0	--	+	0	0	0	++

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Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59732	++	0	++?	0	--?	--?	--?	--?	++	++	0	0	-?	+
59733	+	-	+?	0	--?	--?	--?	0	++	+	0	0	-?	+
59735	+/--?	-	++?	0	--?	--?	--?	--?	--?	+	0	0	-?	++
59737	+	-	+?	0	--?	-?	--?	--?	--?	+	0	0	-?	+
59743	+	-	++?	0	-?	--?	--?	0	--	++	0	0	-?	+
59744	+	-	+?	0	--?	--?	--?	-?	--	+	0	0	0	+
59745	+	-	+?	0	-?	-?	--?	0	--?	+	0	0	-?	+
59746	+/--?	0	++?	0	--?	--?	-?	--?	++	+	0	0	-?	++
59747	+	--	-?	0	--?	--?	--?	--?	--?	-	0	0	0	++
59748	++/--?	-	+?	0	--?	--?	--?	--?	--?	++	0	0	-?	++
59749	+	--	+?	0	--?	--?	--?	--/0	--	-	0	0	-?	++
59750	+/--?	-	+?	0	--?	--?	--?	--?	--?	+	0	0	-?	++
59751	+/--?	-	+?	0	--?	--?	--?	0/-?	--?	-	0	0	0	+
59752	+	-	+?	0	--?	-?	--?	--?	--	+	0	0	-?	++
59753	+	--	+?	0	-?	--?	--?	0	--	-	0	0	0	+
59754	+	--	-?	0	--?	--?	--?	0	-	-	0	0	-?	++

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59755	+	--	-?	0	--?	--?	--?	0	-	-	0	0	-?	++
59756	+	-	+?	0	--?	--?	--?	--/0	--	++	0	0	-?	+
59757	+	--	-?	0	--?	--?	--?	0	--	-	0	0	-?	+
59758	+	-	-?	0	--?	--?	--?	--/0	--	+	0	0	-?	++
59759	+	--	-?	0	--?	-?	--?	0	--	+	0	0	-?	++
59760	+	--	-?	0	--?	--?	--?	0	--	+	0	0	-?	++
59761	+/--?	-	+?	0	--?	--?	--?	0	-	+	0	0	-?	+
59762	+	--	+?	0	--?	--?	--?	-/0	++	+	0	0	-?	+
59763	+	--	-?	0	--?	--?	--?	--?	--	-	0	0	-?	++
59764	+/--?	-	+++?	0	-?	--?	--?	--?	--?	+	0	0	-?	++
59766	+	--	-?	0	--?	--?	--?	--?	--	++	0	0	-?	++
59767	++	0	+?	0	--?	--?	--?	--?	++	++	0	0	-?	+
59768	+	--	+?	0	--?	--?	--?	0	--	+	0	0	-?	+
59771	++	--	+?	0	--?	--?	--?	--?	++	+	0	0	-?	+
59773	+	--	-?	0	--?	-?	--?	0/-?	--	-	0	0	-?	+
59774	+/--?	-	+?	0	--?	--?	--?	0	--?	+	0	0	0	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59775	+	--	-?	0	--?	--?	--?	-/0	++	+	0	0	0	+
59776	++/--?	-	+?	0	--?	--?	--?	--/0	--?	-	0	0	-?	++
59777	+/--?	-	+?	0	-?	--?	--?	--?	--	+	0	0	-?	+
59778	+/--?	-	+?	0	--?	--?	--?	0	--?	+	0	0	0	+
59779	+	--	+?	0	--?	--?	--?	--/0	-	+	0	0	-?	+
59783	+	--	-?	0	--?	--?	--?	--/0	--?	++	0	0	0	++
59784	++/--?	-	+?	0	--?	--?	--?	-/0	--	+	0	0	-?	++
59789	+/--?	-	+?	0	--?	-?	--?	--?	--	+	0	0	0	++
59791	+/--?	-	+?	0	--?	--?	--?	0	--	+	0	0	0	++
59792	+/--?	-	+?	0	--?	--?	--?	0	--	+	0	0	0	++
59793	+	-	-?	0	--?	--?	--?	0/--?	--?	+	0	0	-?	+
59794	++	0	+?	0	--?	--?	--?	0/--?	--?	++	0	--	-?	+
59795	+	--	-?	0	--?	--?	--?	0	++	-	0	0	0	+
59797	+/--?	-	+?	0	--?	--?	--?	--/0	--	+	0	0	-?	++
59798	+/--?	--	+++?	0	--?	--?	--?	--?	--?	+	0	0	-?	++
59799	+	--	-?	0	--?	--?	--?	--?	--	+	0	0	-?	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59800	+/--?	--	+?	0	--?	--?	--?	0/--?	--	+	0	0	-?	++
59802	+	--	+?	0	--?	--?	--?	0/--?	--	+	0	0	-?	++
59803	++	-	+?	0	--?	--?	--?	0/--?	--	++	0	0	-?	++
59806	+/--?	--	-?	0	--?	--?	--?	--?	--	-	0	0	-?	++
59807	++	-	+?	0	--?	--?	--?	--/0	--	++	0	0	-?	+
59808	++	-	+?	0	--?	-?	--?	--?	--?	+	0	0	0	++
59810	+	-	-?	0	--?	--?	--?	--?	-	+	0	0	0	+
59811	+	--	-?	0	--?	--?	--?	--?	--?	-	0	0	-?	++
59814	++	-	+?	0	--?	--?	--?	0	--	++	0	0	-?	+
59818	++	--	+?	0	--?	--?	--?	--?	--	+	0	0	-?	++
59819	++	-	+?	0	--?	--?	--?	0	--	+	0	0	0	+
59820	+	--	+?	0	--?	--?	--?	--/0	++	++	0	0	-?	+
59824	+	-	+++?	0	0?	-?	--?	0	--	++	0	0	-?	++
59827	+	--	+?	0	--?	--?	--?	--?	--?	-	0	0	-?	+
59831	+	-	+?	0	--?	--?	--?	0	--	+	0	0	-?	++
59832	++/--?	-	+?	0	--?	--?	--?	--/0	--	+	0	0	0	+

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59833	+	--	+?	0	-?	--?	--?	0/-?	--	+	0	0	-?	+
59837	+	0	+?	0	-?	-?	--?	--/0	--	+	0	0	0	+
59839	+	--	+?	0	--?	--?	--?	--?	--	++	0	0	-?	++
59841	+	0	+?	0	-?	--?	--?	0	--	+	0	0	0	+
59842	++	-	+?	0	--?	-?	--?	--?	--?	+	0	0	0	++
59843	++	0	+?	0	--?	--?	--?	0/-?	--?	++	0	0	-?	+
59844	+	-	+?	0	--?	--?	--?	--/0	--	++	0	0	-?	+
59845	++	-	+?	0	-?	--?	--?	0	--	++	0	0	-?	+
59852	++	-	+?	0	--?	--?	--?	--?	--	++	0	0	-?	++
59854	++	0	+?	0	--?	--?	--?	0	--	++	0	0	-?	+
59860	++	0	+?	0	--?	--?	--?	--/0	--	++	0	0	-?	+
59861	++/--?	0	-?	0	--?	--?	--?	--?	--	++	0	0	-?	++
59870	+	--	-?	0	--?	--?	--?	0/-?	++	-	0	0	-?	+
59871	+	-	+?	0	--?	--?	--?	-?	--?	+	0	0	-?	+
59872	+	-	+?	0	--?	--?	--?	-?	--?	+	0	0	-?	+
59873	+	--	-?	0	--?	--?	--?	0/-?	++	-	0	0	-?	+

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59877	++	0	++?	0	--?	--?	--?	--?	++	++	0	0	--?	++
59878	++	++	+++?	0	--?	0	--?	--?	++	++	0	0	0	++
59879	++	++	+++?	0	--?	0	--?	--?	++	++	0	--	0	++
59880	+	-	+++?	0	--?	--?	--?	--/0	--	+	0	0	0	++
59881	+	-	++?	0	--?	--?	--?	--/0	--?	+	0	0	0	++
59882	+	--	--?	0	--?	--?	--?	0/--?	--?	-	0	0	0	+
59883	+	--	--?	0	--?	--?	--?	0/--?	--?	-	0	0	0	+
59884	+/--?	+	++?	0	--?	--?	--?	0	-	+	0	0	--?	+
59885	++	+	+++?	0	--?	0	--?	--?	++	++	0	0	0	++

Table 5.2: Employment Site Options

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59593	+	-	N/A	+/0	--?	--?	--?	-?	++	-	0	0	-?	0
59599	+	--	N/A	+	--?	--?	--?	0	--?	+	0	0	0	0
59600	+	-	N/A	+/0	--?	--?	--?	-/0	++	-	0	0	0	0
59611	+	--	N/A	+/0	--?	--?	--?	0/--?	++	-	0	0	0	0
59616	+	-	N/A	++	--?	--?	--?	--?	--	++	0	0	-?	0
59680	+	--	N/A	++/0	--?	--	--?	-/0	--?	-	0	0	0	0
59681	+	--	N/A	+/0	--?	--	--?	-/0	++	-	0	0	0	0
59694	+	0	N/A	++	--?	0	--?	--?	--	+	0	0	-?	0
59701	+	--	N/A	++	--?	-?	--?	--?	--?	+	0	0	-?	0
59705	+	--	N/A	+/0	--?	--?	--?	0	--?	-	0	0	0	0
59727	+	-	N/A	++	--?	--?	--?	--/0	++	++	0	0	-?	0
59772	+	--	N/A	++	--?	--?	--?	--?	--	+	0	0	-?	0
59788	+	--	N/A	++/0	--?	--?	--?	--?	--?	-	0	0	-?	0
59828	+	--	N/A	++/0	--?	--?	--?	--?	--?	-	0	0	0	0
59836	+	-	N/A	++	--?	-?	--?	--/0	-	++	0	0	-?	0

Chapter 5

Sustainability Appraisal Findings for the Reasonable Alternative Development Site Options

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59848	+	-	N/A	++	--?	--?	--?	--?	--?	+	0	0	-?	0
59855	+	-	N/A	++	--?	--?	--?	--/0	--	+	0	0	-?	0
59856	+	-	N/A	++	--?	--?	--?	--?	++	++	0	0	-?	0
59863	+	--	N/A	++	--?	--?	--?	-?	++	+	0	0	-?	0
59891	+	-	N/A	+	--?	--?	--?	0/-?	++	+	0	0	0	0
59892	+	+	N/A	++	-?	0	--?	--?	++	++	0	0	0	0

Table 5.3: Mixed Use Sites Options

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59603	+	--	+?	+	--?	--?	--?	--/0	++	+	0	0	-?	+?
59630	+/--?	--	+?	++	--?	--?	--?	0	-	+	0	0	-?	+?
59643	+	--	-?	+/0	--?	--?	--?	-/0	++	-	0	0	0	+?
59646	+/--?	--	-?	++	--?	--?	--?	--?	++	++	0	0	-?	+?
59650	+	--	-?	++	--?	--?	--?	--?	--	+	0	0	-?	+?
59661	++	-	-?	++	--?	--?	--?	--?	-	+	0	0	-?	+?
59665	+	--	-?	++/0	--?	--?	--?	--?	--?	-	0	0	-?	+?
59666	+	--	+?	++	--?	--?	--?	0	--	+	0	0	0	+?
59667	++	-	+?	++	--?	--?	--?	--/0	--?	++	0	0	0	+?
59668	++/--?	-	-?	++	--?	--?	--?	0	--	++	0	0	-?	+?
59670	+	-	+?	++	--?	--?	--?	0/-?	++	++	0	0	-?	+?
59674	+	-	+?	++	--?	--?	--?	-?	++	++	0	0	-?	+?
59675	+	--	+?	++/0	--?	--?	--?	--/0	--	-	0	0	-?	+?
59676	+/--?	-	+?	++	--?	-?	--?	--?	++	++	0	0	-?	+?
59678	+	--	+?	++	--?	--?	--?	--?	++	++	0	0	-?	+?

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59679	++/--?	0	+	++	--?	--?	--?	--/0	--?	++	0	0	0	+
59682	+	-	+	+	-?	-?	--?	--/0	--	+	0	0	0	+
59683	+/--?	0	++?	++	--?	--?	--?	--?	--?	+	0	0	-?	+
59684	+/--?	-	+	++	--?	-?	--?	--?	++	++	0	0	-?	+
59685	+	-	+	++	--?	-?	--?	--/0	--	+	0	0	0	+
59688	+/--?	--	+	++	--?	--?	--?	--?	++	++	0	0	0	+
59690	+/--?	--	+	++	--?	--?	--?	--?	--?	+	0	0	0	+
59697	++	-	++?	+	--?	--?	--?	--/0	--?	+	0	0	-?	+
59699	++	-	+	++	--?	-?	--?	--/0	--	+	0	0	-?	+
59702	++	--	+	++	--?	--?	--?	0	--	+	0	0	0	+
59706	+	--	-?	+/0	--?	--?	--?	0	--?	-	0	0	0	+
59709	++	0	+	++	--?	--?	--?	--?	--?	++	0	--	-?	+
59711	+/--?	--	++?	++	--?	--?	--?	--/0	++	++	0	0	-?	+
59722	+	--	-?	+	--?	--?	--?	0	--	+	0	0	-?	+
59723	+	--	-?	+	--?	--?	--?	0	--	+	0	0	0	+
59729	++	--	-?	++	--?	--?	--?	0/--?	--	+	0	0	-?	+

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Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59736	+	-	+?	+	--?	--?	--?	--/0	++	+	0	0	-?	+?
59738	+	--	-?	++	--?	--?	--?	0	--	++	0	0	-?	+?
59740	+/--?	-	+?	++	--?	--?	--?	--?	--	++	0	0	-?	+?
59742	+	--	-?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59765	+/--?	-	+++?	++	-?	--?	--?	--?	--?	+	0	0	-?	+?
59770	+	-	+?	+	--?	--?	--?	--?	--?	+	0	0	-?	+?
59780	++/--?	-	-?	++	--?	--?	--?	0/--?	++	+	0	--	-?	+?
59781	++/--?	+	+++?	++	--?	--?	--?	--/0	++	++	0	0	-?	+?
59782	+	--	+?	++	-?	-?	--?	0	--	+	0	0	0	+?
59787	+	-	-?	+	--?	--?	--?	0	++	+	0	0	-?	+?
59790	++	-	+?	+	--?	--?	--?	0	++	+	0	0	0	+?
59796	++	++	+++?	++	-?	0	--?	0/--?	++	++	0	0	0	+?
59801	+/--?	--	+?	++	--?	--?	--?	--/0	--?	+	0	0	-?	+?
59804	+/--?	0	+++?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59805	+/--?	-	+?	++	--?	--?	--?	--?	--	+	0	0	0	+?
59809	+	--	+?	++	--?	-?	--?	--?	--?	+	0	0	0	+?

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59812	+	--	-?	+/0	--?	--?	--?	--?	++	-	0	0	-?	+?
59813	+/--?	-	+?	++	--?	-?	--?	--/0	--	+	0	0	0	+?
59815	++	++	++?	++	0?	0	--?	--?	++	++	0	--	-?	+?
59816	+/--?	-	+?	+	--?	--?	--?	0	--	+	0	0	-?	+?
59821	+/--?	-	+?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59822	+	-	+?	+	--?	--?	--?	--?	--?	+	0	0	-?	+?
59823	+	-	+?	+	--?	0	--?	--/0	--?	+	0	0	-?	+?
59825	+/--?	--	+?	+/0	--?	--?	--?	0	--?	-	0	0	0	+?
59826	++/--?	-	+?	++	--?	--?	--?	--?	--	+	0	0	-?	+?
59829	+	0	++?	++	--?	--?	--?	--?	++	++	0	0	-?	+?
59830	++/--?	0	++?	++	--?	--?	--?	--?	--?	++	0	0	-?	+?
59834	++	-	-?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59835	+/--?	-	++?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59838	+	-	+?	++	--?	--?	--?	--?	++	+	0	0	-?	+?
59840	+/--?	-	++?	++	--?	--?	--?	--?	++	+	0	0	-?	+?
59846	+	--	-?	++/0	--?	--?	-?	--?	--?	--	0	0	-?	+?

Site ID	SA 1 – Health and well-being	SA 2 – Equality and access	SA 3 - Education	SA 4 - Economy	SA 5 – Biodiversity and geodiversity	SA 6 - Landscape	SA 7 – Cultural heritage	SA 8 – Water environment	SA 9 – Soil resources	SA 10 – Minimise climate change	SA 11 – Adaptation to climate change	SA 12 – Air quality	SA 13 – Material assets and waste	SA 14 - Housing
59847	++	-	+?	++	--?	--?	--?	--?	--	++	0	0	-?	+?
59850	+/--?	-	-?	++	--?	--?	--?	--?	--?	+	0	0	-?	+?
59851	+	0	+++?	++	--?	-?	--?	--?	--	++	0	0	-?	+?
59853	++	-	+?	++	0?	--?	--?	-/0	++	+	0	0	0	+?
59857	++	-	+?	++	0?	--?	--?	-/0	++	+	0	0	0	+?
59858	++/--?	-	+?	++	--?	--?	--?	--?	--	+	0	0	-?	+?
59859	++/--?	0	+++?	+	--?	--?	--?	--?	--?	+	0	0	-?	+?
59862	+/--?	-	+?	+	--?	--?	--?	0	--?	+	0	0	0	+?
59864	++/--?	-	+?	++	--?	--?	--?	--?	--	+	0	0	-?	+?
59866	++/--?	-	+++?	++	--?	--?	--?	--?	--	+	0	0	-?	+?
59867	+	-	-?	++	--?	--?	--?	0	++	++	0	0	-?	+?
59868	+	-	-?	++	--?	--?	--?	--/0	++	++	0	0	-?	+?
59869	+/--?	-	+++?	++	--?	--?	--?	--?	--?	++	0	0	-?	+?
59874	+	-	+++?	+	--?	--?	--?	--?	--?	+	0	0	-?	+?
59876	+	-	+?	+	-?	--?	--?	--/0	++	+	0	0	0	+?

## Chapter 6

### Monitoring

**6.1** 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.

**6.2** 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 SA Scoping Report produced by JBA Consulting for TMBC. **Table 6.1** overleaf will be updated at the next stage of the SA to focus on the SA objectives against which significant (including uncertain) effects have been recorded.

**6.3** 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.

Table 6.1: Proposed SA Monitoring Framework for the Tonbridge and Malling Local Plan

SA Objectives and Sub-Objectives	Indicators	Targets
<p><b>1. To improve human health and well-being</b></p> <ul style="list-style-type: none"> <li>■ To reduce health inequalities amongst different groups in the community.</li> <li>■ To improve access to health and social care services.</li> <li>■ To promote healthy lifestyles, including equitable access to recreational opportunities such as open space, children’s play areas and the countryside.</li> <li>■ To maintain low crime levels.</li> <li>■ To reduce the fear of crime.</li> <li>■ To reduce levels of anti-social behaviour.</li> <li>■ To encourage safety by design.</li> <li>■ To promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.</li> </ul>	<ol style="list-style-type: none"> <li>1. Percentage of the resident population who consider themselves to be in good health.</li> <li>2. Number of wards with LSOAs in the bottom 40% most deprived for health deprivation and disability.</li> <li>3. Life expectancy at birth for males and females.</li> <li>4. Percentage of working-age population with a long-term limiting illness.</li> <li>5. Percentage of adults (16+) taking part in sport and active recreation at least three times a week).</li> <li>6. Number and distribution of wards with LSOAs in the bottom 40% most deprived for crime deprivation.</li> <li>7. Crime rates per 1,000 of the population for key offences.</li> <li>8. Number of new developments actively incorporating safety by design principles.</li> <li>9. Number of new initiatives implemented to tackle anti-social behaviour.</li> <li>10. Number of new developments meeting the open green space standards in the adopted Local Plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. Maintain and increase number of people claiming to be in good health.</li> <li>2. Increase access to health services.</li> <li>3. Increase the number of adults and young people participating in sport and physical activity through increasing accessibility to sport facilities and recreational space.</li> <li>4. Reduce the number of crimes per 1000 population.</li> <li>5. Increase access to high quality healthcare facilities.</li> </ol>
<p><b>2. To improve equality and access to community facilities and services.</b></p> <ul style="list-style-type: none"> <li>■ To tackle homelessness more effectively.</li> <li>■ To improve access to cultural and leisure facilities.</li> <li>■ To maintain and improve access to essential services and facilities.</li> <li>■ To promote the use of more sustainable modes of transport.</li> </ul>	<ol style="list-style-type: none"> <li>1. Number of LSOAs in the bottom 40% most deprived for barriers to housing and services provision.</li> <li>2. Homelessness rates</li> <li>3. Net additional Gypsy and Traveller pitches</li> <li>4. Number of essential services and facilities within local settlements.</li> <li>5. Number and distribution of sports facilities and recreational space.</li> </ol>	<ol style="list-style-type: none"> <li>1. Reduce levels of homelessness.</li> <li>2. Increase access to basic services and amenities.</li> <li>3. No net loss of basic services and amenities.</li> <li>4. To increase use of sustainable transport and reduce private car dependence.</li> <li>5. To increase access to broadband internet across the borough (for residential and employment uses).</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
<ul style="list-style-type: none"> <li>■ To encourage walking, cycling and the use of public transport.</li> </ul>	<ol style="list-style-type: none"> <li>6. Journey to work by mode.</li> <li>7. Public transport patronage.</li> <li>8. Percentage of dwellings approved and located within 400m of an existing or proposed bus stop or within 800m of an existing or proposed railway station.</li> <li>9. Number of homes with broadband internet access.</li> </ol>	
<p><b>3. To improve levels of educational attainment and skills and training development for all age groups and all sectors of society</b></p> <ul style="list-style-type: none"> <li>■ To maintain and increase levels of participation and attainment in education for all members of local communities.</li> <li>■ To improve the provision of education and training facilities.</li> <li>■ To improve access to and involvement in higher education for 16-19 year olds.</li> </ul>	<ol style="list-style-type: none"> <li>1. Location and number of educational establishments in Tonbridge and Malling.</li> <li>2. Number and distribution of wards with LSOAs in the bottom 40% most deprived for education, skills and training deprivation.</li> <li>3. Percentage of 15 year old pupils in local authority schools achieving 5 or more GCSEs at Grades 9 – 4 or equivalent.</li> <li>4. Percentage of people aged 19-64 achieving national vocational qualification (NVQ) level 4 or above.</li> <li>5. Percentage of resident adults with no qualifications.</li> <li>6. Percentage of 16-19 year olds continuing in to higher education.</li> </ol>	<ol style="list-style-type: none"> <li>1. At least 95% of adults to have basic skills in both functional literacy and numeracy.</li> <li>2. At least 90% of adults to hold at least level 2 qualifications or equivalent.</li> <li>3. At least 40% of adults to hold at least level 4 qualifications or equivalent.</li> <li>4. No net loss of educational establishments.</li> </ol>
<p><b>4. To encourage sustainable economic growth, business development, and economic inclusion across the borough</b></p> <ul style="list-style-type: none"> <li>■ To diversify employment opportunities.</li> <li>■ To increase employment opportunities.</li> <li>■ To encourage economic growth.</li> <li>■ To reduce levels of unemployment.</li> <li>■ To improve physical accessibility to jobs.</li> </ul>	<ol style="list-style-type: none"> <li>1. Location of key industries and major employers.</li> <li>2. Economic activity rate.</li> <li>3. Employment by sector.</li> <li>4. Number of VAT registered businesses including sectoral information.</li> <li>5. Visitor numbers and tourist revenue data.</li> <li>6. Number of wards with LSOAs in the bottom 40% most deprived for employment deprivation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Increase number of VAT registered businesses.</li> <li>2. Provision of sufficient employment land to meet economic needs.</li> <li>3. No net loss in employment land provision.</li> <li>4. Increase accessibility to employment areas for LSOAs exhibiting higher levels of employment and income deprivation.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
	<ol style="list-style-type: none"> <li>7. Number of wards with LSOAs in the bottom 40% for income deprivation.</li> <li>8. Percentage of unemployed working-age population.</li> <li>9. Location of employment areas relative to housing.</li> </ol>	<ol style="list-style-type: none"> <li>5. No increase in businesses relocating outside the borough. [2021 AMR]</li> <li>6. Net gain in number of planning permissions involving new or improved tourism or recreational facilities [2021 AMR]</li> <li>7. Increase the visitor spend on tourism</li> <li>8. Decrease the numbers of employed people currently working outside of the district.</li> </ol>
<p><b>5. To protect and enhance biodiversity and geodiversity</b></p> <ul style="list-style-type: none"> <li>■ To protect and enhance designated sites of nature conservation importance.</li> <li>■ To protect and enhance wildlife especially rare and endangered species.</li> <li>■ To protect and enhance habitats and wildlife corridors.</li> <li>■ To provide opportunities for people to access wildlife and open green spaces.</li> <li>■ To increase biodiversity net gain.</li> <li>■ To protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.</li> <li>■ To protect, enhance and expand ecological networks and their interconnectivity.</li> <li>■ Conservation of biodiversity, including priority habitats and species, under the NERC Act (S41).</li> <li>■ To protect and enhance sites designated for geodiversity.</li> </ul>	<ol style="list-style-type: none"> <li>1. Number and distribution of designated sites including SAC, SPA, Ramsar sites, SSSI, NNR, LNR and LWSs.</li> <li>2. Number of planning applications approved that result in the loss of extent or other adverse effects on these sites.</li> <li>3. Condition of SSSIs.</li> <li>4. Proportion of the population that has full access to the requirements of the Accessible Natural Green Space Standard.</li> <li>5. Planning/applications refused/granted in designated sites, green wedges, and wildlife corridors.</li> <li>6. Percentage of land designated as nature conservation sites as a result of Local Plan policies. Completed development that has resulted in the loss or creation/restoration of BAP habitats.</li> <li>7. Creation, restoration or enhancement of a population or habitat.</li> <li>8. Increase in percentage/ increase in area or length of habitat creation/enhancement achieved by development.</li> <li>9. Number of planning applications which incorporate habitat creation, restoration, enhancement and</li> </ol>	<ol style="list-style-type: none"> <li>1. Maintain and improve number of SSSIs and SACs in favourable condition along with LNRs and LWSs.</li> <li>2. Increase access to greenspace per head.</li> <li>3. Minimum 10% net gain in biodiversity in association with development.</li> <li>4. Protect and enhance priority habitats and species. Contribute to the protection and creation of new BAP habitats.</li> <li>5. Avoid habitat fragmentation and increase connectivity of habitats.</li> <li>6. Enhance community engagement with biodiversity.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
	connectivity (e.g. linear habitats and wildlife corridors as part of wider ecological networks).	
<p><b>6. To protect and enhance the borough's landscape and townscape character and quality</b></p> <ul style="list-style-type: none"> <li>■ To protect and enhance landscape character and quality.</li> <li>■ To protect and enhance townscape character and quality.</li> <li>■ Protect and enhance the integrity and quality of the borough's urban and rural landscapes, maintaining local distinctiveness and sense of place.</li> <li>■ To protect and enhance AONBs within the borough and their settings</li> </ul>	<ol style="list-style-type: none"> <li>1. Number, location, size and character of Conservation Areas.</li> <li>2. Amount of development in the AONBs</li> <li>3. Conservation Areas at risk</li> <li>4. Change in quality of landscape character and condition.</li> <li>5. The condition and quality of new characteristics introduced to the environment.</li> <li>6. Percentage of open countryside.</li> <li>7. Change in areas designated for their landscape value.</li> </ol>	<ol style="list-style-type: none"> <li>1. No major development within AONBs other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.</li> <li>2. No net loss of Conservation Areas.</li> <li>3. No increase in Conservation Areas at risk.</li> <li>4. Maintain settlement identity and prevent coalescence. Protect and enhance areas of tranquillity.</li> <li>5. Promote schemes designed to promote the diversity of landscape and built character into new development.</li> <li>6. Minimise detrimental visual intrusion.</li> <li>7. Minimise light pollution.</li> </ol>
<p><b>7. To protect and enhance the cultural heritage resource</b></p> <ul style="list-style-type: none"> <li>■ To protect and enhance historic buildings and sites.</li> <li>■ To protect and enhance historic landscape/townscape value.</li> </ul>	<ol style="list-style-type: none"> <li>1. Number and distribution of Listed Buildings, Scheduled Monuments, Conservation Areas and Registered Parks and Gardens.</li> <li>2. Percentage of listed buildings or other assets on the English Heritage at risk register.</li> <li>3. Number of permissions granted against English Heritage advice</li> <li>4. Loss or damage of heritage assets.</li> <li>5. Number of heritage assets on the Heritage Risk Register</li> </ol>	<ol style="list-style-type: none"> <li>1. No increase in heritage at risk as a result of new development.</li> <li>2. No permissions granted against English Heritage advice [2021 AMR].</li> <li>3. Conserve and enhance designated heritage features</li> <li>4. Maintain and enhance the character and distinctiveness of Conservation Areas.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
<p><b>8. To protect and enhance the quality of water features and resources</b></p> <ul style="list-style-type: none"> <li>■ To protect and enhance ground and surface water quality.</li> <li>■ Reduce the risk of flooding to existing communities and ensure no new developments are at risk.</li> <li>■ To contribute towards achievement of relevant River Basin Management Plan aims.</li> <li>■ To protect and enhance water quantity, such as through high standards of water efficiency.</li> </ul>	<ol style="list-style-type: none"> <li>1. Percentage of rivers with good/fair chemical and biological water quality. Percentage of waterbodies achieving 'Good' ecological status</li> <li>2. Number of pollution incidents.</li> <li>3. Number of schemes contributing to the achievement of WFD objectives.</li> <li>4. Number of planning applications granted permission contrary to Environment Agency advice.</li> <li>5. Number of planning applications within SPZ Zones 1 and 2.</li> <li>6. Number of developments accompanied by a Surface Water Management Plans. Number of SuDS schemes installed.</li> <li>7. Water efficiency of new developments.</li> </ol>	<ol style="list-style-type: none"> <li>1. To introduce SuDs into new development.</li> <li>2. No planning permissions granted against EA advice. Contribute to the achievement of WFD objectives.</li> <li>3. Encourage sustainable and efficient management of water resources.</li> <li>4. Protect and where possible improve drinking water quality.</li> <li>5. Improve water quality in the borough's watercourses.</li> <li>6. Enhancement and recreation of natural watercourses.</li> </ol>
<p><b>9. To conserve and enhance soil resources and guard against land contamination</b></p> <ul style="list-style-type: none"> <li>■ To reduce the amount of derelict, contaminated, and vacant land.</li> <li>■ To encourage development of brownfield land where appropriate.</li> <li>■ To protect soil functions and quality.</li> <li>■ Avoid development of 'best and most versatile' soil.</li> </ul>	<ol style="list-style-type: none"> <li>1. Percentage of housing completions on previously developed land.</li> <li>2. Percentage of employment development on previously developed land.</li> <li>3. Area of greenfield land affected by development.</li> <li>4. Areas of ALC grades 1, 2 and 3a lost to development.</li> <li>5. Number of land remediation schemes.</li> </ol>	<ol style="list-style-type: none"> <li>1. 100% of new and converted dwellings on previously developed land</li> <li>2. Greater than 51% of employment land permitted for development on previously developed land [2021 AMR]</li> <li>3. Reduce soil erosion and protect and enhance soil quality and quantity</li> <li>4. Minimise the loss of Grade 1, 2 and Grade 3a ALC land. Reduce contamination of soils from development, industry or agriculture. Promote the use of brownfield land for development where possible. Increase the remediation and regeneration of contaminated land.</li> </ol>
<p><b>10. To reduce greenhouse gas emissions so as to minimise climate change</b></p>	<ol style="list-style-type: none"> <li>1. Total carbon dioxide (CO<sub>2</sub>) emissions per capita per year.</li> </ol>	<ol style="list-style-type: none"> <li>1. To reduce per capita CO<sub>2</sub> emissions each year.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
<ul style="list-style-type: none"> <li>■ To reduce greenhouse gas emissions.</li> <li>■ To increase energy efficiency and require the use of renewable energy sources.</li> <li>■ To reduce the use of energy.</li> <li>■ To promote the use of more sustainable modes of transport.</li> <li>■ To reduce the use of private car.</li> <li>■ To encourage walking, cycling and the use of public transport.</li> <li>■ Encourage the uptake of ICT.</li> </ul>	<ol style="list-style-type: none"> <li>2. Number of planning applications granted permission contrary to Environment Agency advice regarding flooding.</li> <li>3. Annual average domestic gas and electricity consumption per consumer.</li> <li>4. Annual gas and electricity consumption in the commercial/industrial sector.</li> <li>5. Number of applications for renewable energy developments and details of their location.</li> <li>6. Journey to work by mode.</li> <li>7. Public transport patronage.</li> <li>8. Percentage of dwellings approved and located within 400m of an existing or proposed bus stop or within 800m of an existing or proposed railway station.</li> <li>9. Number of homes with broadband internet access.</li> </ol>	<ol style="list-style-type: none"> <li>2. No planning applications permitted contrary to EA advice on flooding.</li> <li>3. Number of new developments where SuDS are appropriately used to increase each year.</li> <li>4. To reduce Annual average domestic gas and electricity consumption per consumer.</li> <li>5. To reduce Annual gas and electricity consumption in the commercial/industrial sector.</li> <li>6. 90% of permissions granted fulfilling renewable energy requirements within policy and by type of renewable energy [2021 AMR].</li> <li>7. 20MW/pa delivery of renewable energy generation permitted [2021 AMR].</li> <li>8. To increase use of sustainable transport and reduce private car dependence.</li> <li>9. To increase access to broadband internet across the borough (for residential and employment uses).</li> </ol>
<p><b>11. To improve adaptation to climate change so as to minimise its impact</b></p> <ul style="list-style-type: none"> <li>■ Reduce the impacts of climate change and reduce greenhouse gas emissions.</li> <li>■ To encourage the inclusion of SuDS in developments.</li> <li>■ To increase the use of materials which withstand climate change impacts (e.g. heat, extreme weather).</li> <li>■ To increase the nature-based solutions such as green walls, tree-planting, etc.</li> </ul>	<ol style="list-style-type: none"> <li>1. Number of SuDS implemented across the borough.</li> <li>2. Number of new developments featuring nature-based solutions.</li> <li>3. Reduction in use of unsustainable materials.</li> <li>4. Greenhouse gas emissions. Proportion of total electricity consumption from renewable sources.</li> <li>5. Condition of designated sites.</li> <li>6. Waste to landfill, recycling and composting rates.</li> <li>7. Number of public transport services and cycle routes created.</li> </ol>	<ol style="list-style-type: none"> <li>1. Increase number of new developments where SuDS are appropriately used to increase each year.</li> <li>2. Increase number of new developments featuring nature-based solutions.</li> <li>3. Increase use of sustainable materials rather than unsustainable materials (for example, using timber rather than concrete)</li> <li>4. Deliver schemes that promote habitat and species resilience and adaptability to the effects of climate change. Promote measures that minimise greenhouse gas emissions.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
		<p>5. Minimise the likely impacts of climate change through promotion of appropriate adaptation measures in new development. Reduce waste and increase reuse, recycling and energy produced of waste. Promote measures that reduce the need to travel and travel distances. Promote measures to reduce the need to travel by car.</p> <p>6. Promote use of public transport</p>
<p><b>12. To protect and improve air quality</b></p> <ul style="list-style-type: none"> <li>■ To protect and improve local air quality.</li> </ul>	<ol style="list-style-type: none"> <li>1. Number and distribution of AQMAs.</li> <li>2. Combined Air Quality Indicator Scores for LSOAs in Tonbridge and Malling.</li> <li>3. Distribution of known key polluting industries.</li> <li>4. Rate of transport modal shift across borough.</li> <li>5. Exceedances of air quality objectives.</li> <li>6. Nitrogen dioxide, sulphur dioxide and particulate emissions.</li> <li>7. Population living in AQMAs. Number of complaints received regarding odour nuisance.</li> </ol>	<ol style="list-style-type: none"> <li>1. No new AQMAs to be designated in the borough.</li> <li>2. To increase use of sustainable transport and reduce private car dependence.</li> <li>3. Maintain and improve local air quality.</li> <li>4. Promote measures that will remove the occurrence of AQMAs.</li> <li>5. Reduce the impacts on air quality from transport. Mitigate against the uses that generate NO<sub>2</sub> or other particulates.</li> </ol>
<p><b>13. To protect material assets and minimise waste</b></p> <ul style="list-style-type: none"> <li>■ To ensure sustainable use of natural resources.</li> <li>■ To reduce the demand for raw materials</li> <li>■ To promote the use of recycled and secondary materials in construction</li> <li>■ To increase the proportion of waste recycling and reuse</li> <li>■ To reduce the production of waste</li> <li>■ To reduce the proportion of waste landfilled</li> </ul>	<ol style="list-style-type: none"> <li>1. Incorporation of secondary and recycled materials in new development projects.</li> <li>2. Number of grey water recycling and water minimisation schemes implemented.</li> <li>3. Number of sustainable design schemes implemented.</li> <li>4. Levels of composting and recycling achieved.</li> <li>5. Levels of fly-tipping</li> <li>6. Amount of household waste landfilled.</li> </ol>	<ol style="list-style-type: none"> <li>1. Increase use of secondary and recycled materials in construction for new developments.</li> <li>2. Increase use of water efficiency schemes in new developments.</li> <li>3. Increase the percentage of municipal waste that is recycled or composted.</li> <li>4. Decrease the amount of fly-tipping.</li> </ol>

SA Objectives and Sub-Objectives	Indicators	Targets
	<ol style="list-style-type: none"> <li>7. Number and distribution of Household Waste Recycling Centres</li> <li>8. Total aggregates extracted from the borough.</li> <li>9. Environmental incidents from mineral extraction facilities.</li> </ol>	
<p><b>14. To provide a suitable supply of high quality housing including an appropriate mix of sizes, types and tenures</b></p> <ul style="list-style-type: none"> <li>■ To supply an appropriate quantity of housing to satisfy demand.</li> <li>■ To supply an appropriate mix of sizes, types and tenures of properties in relation to the respective levels of demand.</li> <li>■ To promote housing that is of high quality.</li> </ul>	<ol style="list-style-type: none"> <li>1. Average house price.</li> <li>2. Ratio of median house prices to median income</li> <li>3. Percentage of homes deemed unfit.</li> <li>4. Number of LSOAs in the bottom 40% most deprived for barriers to housing and services provision.</li> <li>5. Percentage of housing vacant.</li> <li>6. Number of housing /affordable housing completions per annum.</li> <li>7. Percentage of dwellings approved and located within 400m of an existing or proposed bus stop or within 800m of an existing or proposed railway station.</li> <li>8. Number of homes with broadband internet access.</li> </ol>	<ol style="list-style-type: none"> <li>1. Increase the number of homes, (particular affordable homes) in the district in accordance with housing targets.</li> <li>2. Make best use of existing housing stock.</li> <li>3. To increase access to broadband internet across the borough (for residential and employment uses).</li> </ol>

# Chapter 7

## Conclusions

**7.1** The SA of the Regulation 18 Local Plan for Tonbridge and Malling has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. 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.

**7.2** The Regulation 18 Local Plan sets out various non-strategic matters but in particular focuses on a range of strategic matters that TMBC believes are relevant and need to be addressed in the Local Plan (e.g. housing, economic development, natural environment and climate change). 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 the biodiversity and geodiversity, landscape, cultural heritage, water environment and soil resources. Some of these effects have the potential to be significant. However, the development proposed will meet the need for housing in the borough and will also stimulate the economic growth of Tonbridge and Malling.

**7.3** As the plan-making process progresses and the Local Plan is drafted in more detail, the policies included within it and any additional options will continue to be subject to SA, with the findings feeding into the plan at each stage. In particular, consideration will be given to the likely cumulative effects of the plan on the SA objectives.

### Next steps

**7.4** This SA Report will be available for consultation alongside the Regulation 18 Local Plan during autumn 2022.

**7.5** The consultation responses on the Regulation 18 Local Plan and this SA Report will be taken into account in the next stages of the Local Plan preparation process.

LUC  
July 2022

## Appendix A

### Consultation comments received in relation to SA work completed to date

**A.1** TMBC undertook a six-week consultation on the SA Scoping Report for the Local Plan, prepared by JBA Consulting. The consultation period commenced in November 2021.

**A.2 Table A.1** below sets out a summary of the comments received on the SA Scoping Report and a summary of the responses to these comments from JBA Consulting and TMBC.

Table A.1: Comments from statutory consultees

Respondent	Comment	SA Team's response/action taken
Environment Agency	<p><b>Water Efficiency</b></p> <p>No mention or objective for water efficiency measures being a design requirement within this Scoping Report. Kent and the South East are "water stressed" so it is extremely important that development includes measures to address this. We would expect for ALL new residential development a max 110 litres per person per day to be a design requirement. For non-residential, BREEAM "excellent".</p>	<p>Water efficiency is considered within SA Objective 13: To protect material assets and minimise waste. The issue raised is for the Local Plan to consider, not the SA. Water quantity has been included as a sub-objective of SA Objective 8.</p> <p>The Council is mindful that 110 litres/person/day is the Government's tighter optional standard in the Building Regulations on water efficiency and that the potential to pursue this needs to be investigated and tested as part of the plan-making process. This is what the Council will do in accordance with the expectations of the Government's planning practice guidance and through consultation with the Environment Agency and other stakeholders.</p>
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 5, Page 60/61</b></p> <p>We welcome seeing BNG as an objective and in the context of future developments. However, a target of 10% would only just meet the requirements of the soon to be Mandated Environment Bill. There are other council boroughs that have committed to an achievement of 20% BNG. Adopting this even further forward thinking approach would demonstrate a leading mentality to protect and enhance biodiversity and would further contribute to achieving the objectives and sub-objectives stated.</p>	<p>No action required for the Scoping Report. The Council is mindful that the Environment Act makes 10% BNG mandatory. Alternative levels of BNG can be tested through the Local Plan viability evidence, alongside other potential local policies.</p>
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 8, Page 61-62</b></p> <p>We welcome seeing the WFD considered and an objective to contribute to the achievement of WFD objectives. Based on the significant deterioration in chemical quality and surface water condition within Medway, we recommend further objectives/targets to ensure new developments respect the status objectives for relevant waterbodies as required under the WFD. This could be to encourage</p>	<p>Included sub-objective 'to contribute towards achievement of relevant River Basin Management Plan aims' under SA Objective 8: To protect and enhance the quality of the water features and resources.</p>

Respondent	Comment	SA Team's response/action taken
	developments to review and seek the River Basin Management Plan to implement mitigation measures and contribute to the delivery in meeting and maintaining the waterbody status objectives.	
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 8, Page 61-62</b></p> <p>It should be noted however, the apparent significant decline in results has not been driven by a sudden deterioration in water quality. Rather it reflects a change in approach to classifying the chemical status of English waterbodies, which means that the 2015/2016 and 2019 classifications are not directly comparable. The revised approach includes improvements to our biota monitoring capabilities (monitoring for the presence of these substances in fish and shellfish as well as in water) as well as our interpretation of the data. This has resulted in a more comprehensive assessment of the prevalence of certain persistent and bio-accumulative substances in the environment. It is these substances that are causing the widespread failures. They account for a relatively small number of the 52 chemicals assessed in our surface waters - there's little underlying change in the chemical status for the others. Although it is uncomfortable to see such widespread chemical status failures in our waterbodies, the 2019 classifications provide us with a better understanding of the scale of the challenge ahead. This is an important positive step towards improving the health of our water environment.</p>	References to 2015/2016 water quality classification results have been removed since these are not comparable with the 2019 results.
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 8, Page 61-62</b></p> <p>There is no mention of the Natural Environment and Rural Communities Act (NERC) 2006. Section 40 requires councils to have regard, in the exercising of their functions, to the purpose of conserving biodiversity. There are more specifics with the NERC act that relate to priority species and habitats 'of conservation importance'.</p>	Reference to NERC Act included under SA Objective 5 as a sub-objective stating 'conservation of biodiversity, including priority habitats and species, under the NERC Act (S41).'
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 8, Page 61-62</b></p> <p>It is welcome to see clear objectives in Section 5 of Table 5-3 in the Scoping Report regarding the protection and enhancement of designated sites, rare and endangered species, habitats and wildlife corridors. However, a further objective could be added regarding the protection and enhancement of priority species and habitats of conservation importance, and mention of action which contributes to this, such as restoring or enhancing a population or habitat.</p>	Under SA Objective 5 included the sub-objective 'to protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.'

Respondent	Comment	SA Team's response/action taken
		Under the indicators column, included in the SA Scoping Report including: 'creation, restoration or enhancement of a population or habitat.'
Environment Agency	<p><b>Table 5-3 Proposed SA Framework. Section 8, Page 61-62</b></p> <p>We welcome the inclusion of water quality protection objectives/targets.</p>	No action required.
Environment Agency	<p><b>Section 4.4.2</b></p> <p>We would suggest that the Ditton Stream is added to the List of Main Rivers within the borough under Section 4.4.2.</p>	Included Ditton Stream on list of Main Rivers in the baseline information.
Environment Agency	<p><b>Section 4.3.3, Page 32</b></p> <p>Please also record European Eel within this section they are critically endangered and found within the waterways of the borough.</p>	The list of notable habitats and species in the baseline information has been updated to reflect the Kent Biodiversity Strategy.
Natural England	<p><b>Paragraph 4.3.4</b></p> <p>The paragraph correctly refers to European sites needing to meet certain legislation. We advise that this paragraph should go further by saying that local plan options will aim to support nature recovery and look to establish, enhance and extend ecological networks through the borough. European, national and locally designated sites within your borough should act as priority focal points as part of a wider local nature recovery network. Efforts to achieve BNG should also directly contribute to and complement these wider networks where possible.</p>	Text included in the baseline information as follows: 'at a local scale, developments should seek to support nature recovery, including the establishment, enhancement and extension of ecological networks within the borough'.
Natural England	<p><b>Objective 1: To improve human health and well-being</b></p> <p>We welcome the promotion of 'healthy lifestyles, including equitable access to recreational opportunities, such as open space, children's play areas and the countryside'. This should be made stronger by promoting high standards of Green Infrastructure throughout the borough that aims to connect people with nature and maximise cross-cutting benefits of health, wellbeing, biodiversity and climate change. Appropriate indicators could refer to the ANGSt (Accessible Natural Green Space</p>	It would be premature, at this stage of plan-making, to make a firm commitment to ANGst and Natural England's emerging Green Infrastructure Standards. The Council is mindful that there are other benchmarks on open green space provision, including those devised by Fields in Trust. As part of the review process the Council will have regard to the range of relevant guidance on this matter.

Respondent	Comment	SA Team's response/action taken
	Standards, as is referenced elsewhere) and Natural England's emerging Green Infrastructure Standards.	<p>Under SA Objective 1: To improve human health and wellbeing, a sub-objective has been included stating 'to promote healthy lifestyles through connecting people with nature and promoting high standards of Green Infrastructure.'</p> <p>Under indicators column in <b>Table 6.1</b>, included: 'number of new developments meeting the open green space standards in the adopted Local Plan'.</p>
Natural England	<p><b>Objective 2: To improve equality and access to community facilities and services</b></p> <p>We welcome the sub-objectives that promote sustainable and active forms of transport. There is an opportunity to explore here relating to transport networks that incorporate nature-based solutions and green infrastructure which could contribute to ecological networks.</p>	While the Council will seek opportunities for incorporating nature-based solutions were possible, it is mindful that the highways authority for the borough is Kent County Council (KCC) and that decisions on how new transport networks are delivered is ultimately down to them. However, the Council will endeavour to work with KCC to achieve this objective.
Natural England	<p><b>Objective 5: To protect and enhance biodiversity</b></p> <p>We welcome the sub-objectives relating to protecting and enhancing the natural environment. However, it is our view that they should go further by focussing on local plan options that contribute to reversing the trend of ecological decline by working towards nature recovery through biodiversity net gain, wider environmental gains, and local nature recovery strategies including targeted and connected habitat creation and restoration that are accessible throughout the borough in a fair way. While there are elements of some of these considerations present, the SA needs to consider these more explicitly as an integral part of the local plan, in our view.</p>	<p>Local Plan options have been appraised in this Interim SA Report. This was not an issue for the Scoping Report to consider.</p> <p>Under SA Objective 5, a sub-objective has been included stating 'to protect and enhance priority species and habitats of conservation importance that contribute to reversing the trend of ecological decline.'</p> <p>Under indicators column in <b>Table 6.1</b>, included 'creation, restoration or enhancement of a population or habitat.'</p>
Natural England	<p><b>Objective 5: To protect and enhance biodiversity, sub-objectives</b></p> <p>We advise that sub-objectives should consider the protection, enhancement and expansion of ecological networks and their inter-connectivity. Useful guidance for Nature networks is available here:</p>	Under SA Objective 5, a sub-objective has been included stating 'to protect, enhance and expand ecological networks and their interconnectivity.'

Respondent	Comment	SA Team's response/action taken
	<p><a href="http://publications.naturalengland.org.uk/publication/6105140258144256">http://publications.naturalengland.org.uk/publication/6105140258144256</a> . We do note that the targets refer to avoiding habitat fragmentation and increasing connectivity which is welcome.</p>	
<p>Natural England</p>	<p><b>Objective 5: To protect and enhance biodiversity, sub-objectives</b></p> <p>We support the reference to Biodiversity Net Gain but advise that the wording needs to be clearer and stronger about how BNG will be 'increased'. We advise that plans and policies can and should seek to maximise the cross-cutting benefits of delivering BNG by aiming for wider environmental net gains for people and nature. This can be achieved through green infrastructure that has multi-functional benefits. Natural England's voluntary Environmental Benefits from Nature Tool may help with this and produced useful indicators once it is finalised (see the beta version here: <a href="http://publications.naturalengland.org.uk/publication/6414097026646016">http://publications.naturalengland.org.uk/publication/6414097026646016</a> )</p>	<p>No action required. This comment seems to be requiring a policy response, rather than an amendment to the SA Objective specifically.</p>
<p>Natural England</p>	<p><b>Objective 5: To protect and enhance biodiversity, Indicators and Targets</b></p> <p>We support the target of a minimum of 10% net gain as the baseline to work from according to the Environment Act. We also encourage your Authority to explore the feasibility of going beyond this 10% figure to maximise net gains for all or a proportion of development within the borough.</p>	<p>No action required.</p>
<p>Natural England</p>	<p><b>Objective 5: To protect and enhance biodiversity, Indicators and Targets</b></p> <p>Monitoring metrics could be more meaningful by considering the percentage difference and area/length of habitat creation/enhancement achieved on projects at design/planning and in practice (through monitoring). This is important for considering the effectiveness of BNG policies and measures and will be helped through the BNG Register that will be available in the future.</p>	<p>Under SA Objective 5, additional text has been included under target column in <b>Table 6.1</b> stating 'increase in percentage / increase in area or length of habitat creation/enhancement achieved by development'</p>
<p>Natural England</p>	<p><b>Objective 5: To protect and enhance biodiversity, Indicators and Targets</b></p> <p>We welcome the general endeavour of maintaining and improving the condition of designated sites. However, these types of metrics need to be considered carefully in terms of how they can be used to assess the effectiveness and sustainability of a local plan or project because there are many variables that can influence these metrics, including those outside the scope of the local plan. Therefore, it is likely to be more meaningful to use monitoring indicators that are more specific to what is within the local plan's scope. For example, by considering the number of planning applications approved that result in the loss of extent or other adverse effects on these sites.</p>	<p>Under SA Objective 5, additional indicator has been included in <b>Table 6.1</b> stating 'number and distribution of designated sites' to state 'number of planning applications approved that result in the loss of extent or other adverse effects on these sites.'</p>

Respondent	Comment	SA Team's response/action taken
Natural England	<p><b>Objective 5: To protect and enhance biodiversity, Indicators and Targets</b></p> <p>Another metric that we advise should be considered is the number of planning applications which incorporate habitat creation, restoration, enhancement and connectivity (e.g. linear habitats and wildlife corridors as part of wider ecological networks). This will help to provide a detailed and more complete representation of how effective measures are.</p>	<p>Under SA Objective 5, additional indicators have been included in <b>Table 6.1</b> stating 'number of planning applications which incorporate habitat creation, restoration, enhancement and connectivity (e.g. linear habitats and wildlife corridors as part of wider ecological networks.)'</p>
Natural England	<p><b>Objective 5: To protect and enhance biodiversity, Indicators and Targets</b></p> <p>The number of developments meeting Green Infrastructure Standards and assessment methods, including third party certification schemes, may also provide helpful indicators for determining the number of projects that contribute to this objective.</p>	<p>No action required. This comment seems to be requiring a policy response.</p>
Natural England	<p><b>Objective 6: To protect and enhance the borough's landscape and townscape character and quality</b></p> <p>We support the overarching objective of protecting the borough's landscape character and quality. Sub-objectives should also specifically refer to AONBs and their settings as key features of the landscape that are relevant to significant parts of the borough. Indicators and targets should also be explored to consider design in line with relevant AONB Management Plans, relevant supplementary guidance and the National Design Guide and National Design Code  <a href="https://www.gov.uk/government/publications/national-design-guide/">https://www.gov.uk/government/publications/national-design-guide/</a>  <a href="https://www.gov.uk/government/publications/national-model-design-code/">https://www.gov.uk/government/publications/national-model-design-code/</a></p>	<p>Under SA Objective 6: to protect and enhance the borough's landscape and townscape character and quality, a sub-objective has been included relating to AONBs that states 'protect and enhance AONBs within the borough and their settings.'</p> <p>A target has also been included in <b>Table 6.1</b> stating 'no major development within AONBs other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.'</p>
Natural England	<p><b>Objective 8: To protect and enhance the quality of water features and resources</b></p> <p>We welcome the consideration of water quality. Sub-objectives should also focus on conserving water quantity. For example, through high standards of water efficiency and grey/rainwater harvesting in development. This can have benefits for water quality while reducing the impact on water consumption in Kent which is a water-stressed area. The indicators should specifically consider predicted Litres per person per day regarding water efficiency of new development calculated for Planning and Building Regulations purposes. Plans and strategies that compensate for impacts on water quality/quantity could also be considered (e.g. retrofit of water saving measures).</p>	<p>Under SA Objective 8: To protect and enhance the quality of water features and resources, a sub-objective has been included covering water quantity which states 'To protect and enhance water quantity through high standards of water efficiency.'</p> <p>New indicator included in <b>Table 6.1</b> stating 'water efficiency of new developments'.</p>

Respondent	Comment	SA Team's response/action taken
		<p>The Council is mindful that 110 litres/person/day is the Government's tighter optional standard in the Building Regulations on water efficiency and that the potential to pursue this needs to be investigated and tested as part of the plan-making process. This is what the Council will do in accordance to the expectations of the Government's planning practice guidance and through consultation with the Environment Agency and other stakeholders.</p>
<p>Natural England</p>	<p><b>Objective 9: To conserve and enhance soil resources and guard against land contamination</b></p> <p>We generally support the premise that brownfield sites are more likely to be appropriate for development compared to other sites. However, Brownfield sites can be of high environmental value, for example, by supporting Priority Habitats, protected or Priority Species or be of geological interest. We therefore advise that this sub-objective is updated to reflect this to help clarify what is meant in the sub-objective where it says 'where appropriate'. The Open Mosaic Habitat Inventory should be checked and referred to as part of investigations into appropriate brownfield sites for development and as part of this objective's targets and indicators.</p>	<p>No action required. The Council understands that some brownfield land may have some environmental value. However, it would be an over-simplification to reject these brownfield options on this basis alone at this stage. There are significant wider sustainability consequences to consider of this action that could, potentially, result in greater environmental harm, especially if there is increased pressure on releasing green field sites if certain brownfield options are rejected on a single issue. The Council is thankful for NE drawing to our attention the Open Mosaic Habitat Inventory and we will have regard to this, alongside a range of other evidence, when determining suitable sites for inclusion in the Plan.</p>
<p>Natural England</p>	<p><b>Objective 9: To conserve and enhance soil resources and guard against land contamination</b></p> <p>The protection of soil functions and quality are welcome. The sub objectives should also specifically aim to avoid development on Best and Most Versatile soil to give this an appropriate level of emphasis.</p>	<p>Under SA Objective 9: To conserve and enhance soil resources and guard against land contamination, the sub-objective 'avoid development of best and most versatile soil' has been included.</p>
<p>Natural England</p>	<p><b>Objective 10: to reduce greenhouse gas emissions so as to minimise climate change</b></p> <p>We support Objective 11's reference to nature based solutions in relation to adaptation and advise that objective 10 should also consider green infrastructure and nature based solutions as ways to reduce greenhouse gases through carbon sequestration. Nature based solutions should be prioritised</p>	<p>does not propose to amend any of the sub-objectives/indicators/targets under Objective 10: to reduce greenhouse gas emissions so as to minimise climate change, since this objective is more related to energy efficiency/sustainable transport. Green infrastructure and</p>

Respondent	Comment	SA Team's response/action taken
	as they can deliver multiple benefits that simultaneously contribute to multiple objectives such as habitat creation and wildlife corridors, natural shading/cooling and water quality improvements.	nature based solutions incorporated into other objectives where more appropriate.
Natural England	<b>Objective 10: to reduce greenhouse gas emissions so as to minimise climate change</b> We support the consideration of improvements in energy efficiency and the use of renewable energy sources. This may be achieved through sustainable design and construction techniques and we would particularly encourage design that also includes features that protect and enhance the natural environment. Metrics for this could include number of homes/commercial properties achieving third party certification/verification standards and high standards of sustainable design (e.g. energy efficiency, ecological protection, whole-life carbon etc).	No action required. Tonbridge and Malling Borough Council do not require development to achieve third party certification/verification standards and it is unclear how you would define and monitor high standards of sustainable design. What is proposed in this consultation response will be covered within Local Plan policy wording as relevant.
Natural England	<b>Objective 11: To improve adaptation to climate change so as to minimise its impact</b> We welcome the encouragement of SuDS in developments. We encourage this wording to be strengthened by ensuring that plan options will deliver these as far as possible where they would add value, and preference should be given to SuDS that maximise wider environmental benefits.	No action required. This relates to the Local Plan policy wording, rather than the SA.
Natural England	<b>Objective 11: To improve adaptation to climate change so as to minimise its impact</b> We support the target to deliver schemes that promote habitat and species resilience and adaptability to the effects of climate change as an important part of this objective. This should also be considered as part of objective 5.	No action required. Duplication of the same target should be avoided for clarity.
Natural England	<b>Objective 11: To improve adaptation to climate change so as to minimise its impact</b> Please see our comments regarding Objective 5 and the use of designated site condition as a metric for Objective 11.	No action required. See previous response.
Historic England	<b>General Comment</b> HE has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you might find helpful in preparing the SA <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a>	No action required.

## Appendix B

### Review of relevant plans, policies and programmes

#### International plans and programmes of most relevance for the Local Plan<sup>11</sup>

**B.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998)** – 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.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002)** – Sets the 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.3 The Intergovernmental Panel on Climate Change, Special Report: Global Warming of 1.5°C (2018)** – An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty.

**B.4 United Nations Paris Climate Change Agreement (2015)** – International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

**B.5 International Convention on Wetlands (Ramsar Convention) (1976)** – International agreement with the aim of conserving and managing the use of wetlands and their resources.

**B.6 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979)** – Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to

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<sup>11</sup> Please note that the Council took the approach in the SA Scoping Report (2020) of excluding plans and policies above the national level given that the objectives of these are translated into national policy,

principally through the NPPF. For completeness this report includes details of plans and policies of most relevance at the international level.

regulate the exploitation of those species (including migratory species).

**B.7 International Convention on Biological Diversity (1992)** – International commitment to biodiversity conservation through national strategies and action plans.

**B.8 United Nations Declaration on Forests (New York Declaration) (2014)** – Sets out international commitment to cut natural forest loss by 2020 and end loss by 2030.

**B.9 United Nations (UNESCO) World Heritage Convention (1972)** – 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.10 European Convention for the Protection of the Architectural Heritage of Europe (1985)** – 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.11 European Landscape Convention (2002)** – 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.

**B.12 The Trans-European Networks (TEN) was created by the European Union by Articles 154-156 of the Treaty of Rome (1957)**, with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

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

### Climate change adaption and mitigation

**B.13 HM Government, The Climate Change Act 2008 (as amended)** – sets legally binding targets for reducing emissions of greenhouse gases by 2050. The net UK carbon account for 2050 must be at least 100% lower than the 1990 baseline.

**B.14 HM Government, Net Zero Strategy: Build Back Greener (2021)** - sets out policies and proposals for decarbonising all sectors of the UK economy to meet the UKs net zero target by 2050.

**B.15 Defra, The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate (2018)** – sets out the strategy for adapting both to the climate change that is already evident, and that which we might see in the future.

**B.16 Met Office, State of the UK Climate (2021)** – the seventh in the annual series of reports that provide a summary of the UK weather and climate through the calendar year 2020, 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.17 Department for Transport, Decarbonising Transport: Setting the Challenge (2020)** – sets out the strategic priorities for a new Transport Decarbonisation Plan (TDP), to be published later in 2020, will set 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 will take a coordinated, cross-modal approach to deliver the transport sector’s contribution to both carbon budgets and net zero.

**B.18 Environment Agency, National Flood and Coastal Erosion Risk Management Strategy for England (2020)** – sets out the national framework for managing the risk of flooding and coastal erosion. It provides a framework for guiding the operational activities and decision making of practitioners supporting the direction set by government policy.

**B.19 HM Government, The Energy Performance of Buildings Regulations (2021)** – 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.20 HM Government, The Waste (Circular Economy) Regulations (2020)** – 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.21 Ministry of Housing, Communities and Local Government, National Planning Policy for Waste (NPPW) (2014)** – sets out a number of key planning objectives. It requires that local planning authorities help deliver sustainable development through measures including driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns; and providing a framework in which communities can take more responsibility for their own waste.

**B.22 Defra, Waste Management Plan for England (2021)** – sets out the measures for England to work towards a zero waste economy.

**B.23 HM Government, The Clean Growth Strategy (2017)** – 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.

### Health and well-being

**B.24 Public Health England, PHE Strategy 2020-25** – 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.25 HM Government, Laying the foundations: a housing strategy for England (2011)** – aims to provide support to the delivery of new homes and to improve social mobility.

**B.26 Ministry of Housing, Communities and Local Government, Planning Policy for Traveller Sites (2015)** – to be read in conjunction with the NPPF, this policy document sets out the Government's planning policy for Traveller sites to ensure fair and equal treatment for Travellers.

**B.27 Ministry of Housing, Communities and Local Government, National Design Guide (2021)** – 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 (biodiversity/geodiversity, landscape and soils)

**B.28 Defra, A Green Future: Our 25 Year Plan to Improve the Environment (2018)** – 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.29 Defra, 25 Year Environment Plan: progress reports (2020)** – 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.30 Defra, Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)** – Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks.

**B.31 Defra, Biodiversity offsetting in England Green Paper (2013)** – sets out a framework for biodiversity offsetting. Offsets are conservation activities designed to compensate for residual losses.

**B.32 Defra, The Natural Choice: securing the value of nature (2011)** – sets out a vision for the natural environment of England over the next 50 years. The white paper includes a programme of action which aims to improve the quality of the natural environment, halt species and habitat decline, and strengthen the connection between people and nature.

**B.33 Defra, Landscapes Review (2019)** – explores the fragmented and often marginalised system of managing National Parks and AONBs recommends actions to achieve structural reform. The review looks at:

1. The existing statutory purposes for National Parks and AONBs and how effectively they are being met;
2. The alignment of these purposes with the goals set out in the 25 Year Environment Plan;
3. The case for extension or creation of new designated areas;
4. How to improve individual and collective governance of National Parks and AONBs, and how that governance interacts with other national assets;

5. The financing of National Parks and AONBs;
6. How to enhance the environment and biodiversity in existing designations;
7. How to build on the existing eight point plan for National Parks and connect more people with the natural environment from all sections of society and improve health and wellbeing;
8. How well National Parks and AONBs support communities; and
9. The process of designating National Parks and AONBs and extending boundary areas, with a view to improving and expediting the process.

**B.34 Defra, Safeguarding our Soils – A Strategy for England (2009)** – sets out how England’s soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in 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.35 Natural England, Climate Change Adaptation Manual (2020)** – 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.36 Natural England, National biodiversity climate change vulnerability model (2014)** – a model that allows non-specialists to assess the vulnerability of areas of priority habitat to climate change based on widely accepted principles of climate change adaptation for biodiversity. It assists in the development of adaptation strategies for biodiversity.

### Historic environment

**B.37 The Heritage Alliance, Heritage 2020** – sets out the historic environment sector’s plan for its priorities between 2015 and 2020.

**B.38 Historic England, Corporate Plan 2018-2021** - 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.39 Historic England, Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 (2016)** – sets out Historic England’s guidance

and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment processes.

### Water and air

**B.40 Environment Agency, Managing Water Abstraction (2016)** – Is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

**B.41 Defra, Water White Paper (2012)** – sets out the Government’s vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It outlines the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

**B.42 Defra, Clean Air Strategy (2019)** – sets out the comprehensive action that is required from across all parts of government and society to meet goals relating to ensuring cleaner air. This is to 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. The UK has set stringent targets to cut emissions by 2020 and 2030.

### Economic growth

**B.43 The White Paper Levelling Up in the United Kingdom (2022)** – sets out how the UK Government will spread opportunity more equally across the UK.

**B.44 Build Back Better: Our Plan for Growth (2021)** – 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.45 HM Government, Industrial Strategy: building a Britain fit for the future (2018)** – sets out a long-term policy framework for how Britain will be built to be fit for the future in terms of creating a successful, competitive and open economy. It is shaped around five ‘foundations of productivity’ – the essential attributes of every successful economy: Ideas (the world’s most innovative economy); People (good jobs and greater earning power for all); Infrastructure (a major upgrade to the UK’s infrastructure); Business Environment (the best place to start and grow a business); Places (prosperous communities across the UK).

**B.46 Infrastructure and Projects Authority, National Infrastructure Delivery Plan 2016-2021** – brings together the Government’s plans for economic infrastructure over this five

year period with those to support delivery of housing and social infrastructure.

**B.47 LEP Network, LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)** – 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.

### Transport

**B.48 Department for Transport, The Road to Zero (2018)** – 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.49 Department for Transport, The Strategic Road Network and the Delivery of Sustainable Development Circular 02/13 (2013)** – sets out how Highways England engage with communities and the development industry to deliver sustainable development and economic growth, whilst safeguarding the primary function and purpose of the strategic road network.

**B.50 Defra, Rights of Way Circular 01/09** – sets out advice for local authorities on recording, managing and maintaining, protecting and changing public rights of way.

### Sub-national plans and programmes of most relevance for the Local Plan

**B.51 Kent Local Flood Risk Management Strategy 2017-2023** – sets out how local flood risk will be managed in the county by the local authorities involved.

**B.52 Commissioning Plan for Education Provision in Kent 2021-2025** - Sets out the future need for education standards. The overarching aim of the plan is to make Kent a county that works for all children.

**B.53 Kent County Council Growth and Infrastructure Framework (2018)** – 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.54 Kent County Council Minerals and Waste Local Plan (2016)** – sets out the future minerals supply and waste manage in Kent until the year 2030.

**B.55 Kent County Council Active Travel Strategy 2018/2019**– 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.56 Kent and Medway Energy and Low Emissions Strategy Implementation Plan 2020 – 2023** - sets out the response to the UK climate emergency and promote clean and resilient economic recovery that eliminates poor air quality, reducing fuel poverty and promotes the development of an affordable, clean and secure energy supply across Kent and Medway.

**B.57 Kent County Local Transport Plan 4: Delivering Growth without Gridlock 2016 – 2031** - sets out a clear evidenced basis from which to bid for funding and deliver infrastructure to support housing and economic growth within the county.

**B.58 Kent Nature Partnership Biodiversity Strategy 2020 to 2045** – 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.59 Kent Environment Strategy 2016** – identifies the significant environmental challenges for Kent County currently and into the future.

**B.60 Kent Joint Health and Wellbeing Strategy** - the overarching aim of the health and wellbeing strategy is to ‘improve health and wellbeing outcomes, deliver better coordinated care, improve the public’s experience of integrated health and social care services in the county.

### Local

**B.61 Tonbridge and Malling Borough Council Local Development Framework – Core Strategy (Adopted 2007)** – 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.62 Tonbridge and Malling Borough Council Local Development Framework – Tonbridge Central Area Action Plan 2008** – 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.63 Tonbridge and Malling Borough Council Local Development Framework – Development Land Allocations**

**2008** – 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.64 Tonbridge and Malling Borough Council Managing Development and the Environment 2010**

– 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 an enhanced whilst preserving a sense of place” as well as achieving the best balance between the built and natural environment.

**B.65 Tonbridge and Malling Borough Council Climate Change Strategy 2020 – 2030**

– 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.66 Tonbridge and Malling Cycling Strategy 2013-2018** – collates the relevant policies and related action plans to promote cycling and the development of appropriate cycling facilities throughout the borough.

**B.67 Tonbridge and Malling Borough Council Air Quality Action Plan 2020**

– sets out the actions to be taken by the borough council up to 2025 to reduce concentrations of air pollutants within the borough.

**B.68 Tonbridge and Malling Borough Council Contaminated Land Inspection Strategy 2016**

– the main objective is to 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.69 Tonbridge and Malling Borough Council: Borough Economic Recovery Strategy 2021 – 2023**

– the purpose of this strategy is to 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.70 Tonbridge and Malling Borough Council Corporate Strategy 2020-2023**

– follows on from the 2017-2019 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.71 Tonbridge and Malling Community Safety**

**Partnership Plan 2019-2020** – an annual plan that sets out the objectives that partnership will work towards to address community safety issues in the borough over the coming year.

**B.72 Tonbridge and Malling Borough Council Affordable Housing Supplementary Planning Document 2008**

– a supplementary planning document founded on the need for affordable housing in Tonbridge and Malling.

**B.73 Tonbridge and Malling Borough Council Housing Delivery Test Action Plan 2021**

– sets out the issues affecting housing supply in the borough and identifies actions to help boost the delivery of new homes.

**B.74 Tonbridge and Tunbridge Wells – Tonbridge Urban Transport Delivery Strategy 2007**

- 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.75** The adopted Local Plans for the local authority areas surrounding Tonbridge and Malling and the strategic plans at county level which could potentially contribute to in-combination effects with the Tonbridge and Malling Local Plan 2040 are as follows:

**B.76 Maidstone Borough Local Plan 2011 - 2031** - the plan sets out the framework for development in the borough until 2031. This includes provision of 17,660 dwellings, 187 pitches for Gypsy and Traveller and Travelling Showpeople accommodation and the 14,394 jobs. During the plan period, the borough also plans to provide 6,100m<sup>2</sup> of convenience floorspace and 23,700m<sup>2</sup> comparison floorspace, all of which can met through land allocations and the town centre broad location in the local plan.

**B.77 Tonbridge Wells Core Strategy Development Plan Document (2010)**

- the core strategy sets out the amount of development required across the borough to 2026 and is the central part of the existing statutory 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, 26,500m<sup>2</sup> of additional (non-food) floorspace will also be provided.

**B.78 Sevenoaks Core Strategy (2011)**

- 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.

**B.79 Gravesham Local Plan Core Strategy (2014) – the** core strategy 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, 4,840 jobs and 186,490m<sup>2</sup> employment floorspace. The development will 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 sites; and around 2,280 new dwellings will be provided on other sites in the urban area and rural settlements inset from the Green Belt.

**B.80 Medway Local Plan (2003) -** The Local Plan for Medway currently covers Development Plan policies from a number of plans, including the Medway Local Plan 2003. Medway Council are working on a new Medway Local Plan which will replace the existing 2003 Local Plan. Medway’s Local Plan policies were due to expire in September 2007. As there were no appropriate Local Development Documents adopted to replace the Local Plan, Medway Council applied to the Secretary of State to save those policies which remained in conformity with national and regional planning policies.

## Appendix C

### Baseline information

**C.1** Sustainability appraisal requires the collection and review of baseline information to provide the basis for predicting and monitoring effects and to aid the identification of sustainability issues and possible methods of dealing with them. Baseline information has been updated during each stage of the SA process to ensure that they reflect the current situation in Tonbridge and Malling and continue to provide an accurate basis for assessing the likely effects of the Local Plan.

### An introduction to Tonbridge and Malling

**C.2** The Tonbridge and Malling Borough covers an area of around 24,000 hectares (93 square miles) and has a population of 134,481 people. Within the borough, Tonbridge is the main town with further urban areas including the Medway Gap, Kings Hill, Snodland and part of Walderslade, with additional rural service centres of East Peckham, Borough Green, Hadlow, Hildenborough and West Malling. Most of the borough is rural in character, with several villages and small towns. The borough benefits from proximity to London and the South East coast. 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 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 roads. These roads connect the borough to wider transport networks including the M25 motorway and channel ports.

**C.3** There are two Areas of Outstanding Natural Beauty (AONB) situated within the borough: the High Weald in the south and Kent Downs in the north. Additional ecological and biodiversity designations are located across the borough including two Special Areas of Conservation (SACs), eleven Sites of Special Scientific Interest (SSSI) and 48 Local Wildlife Sites (LWS).

**C.4** There are also numerous heritage assets located within the borough, including over 1,300 listed buildings, 25 Scheduled Monuments, and 61 Conservation Areas.

## Economic Baseline

### Labour Market

**C.5** There were an estimated 75,000 jobs in Tonbridge and Malling in 2020<sup>12</sup>. The proportion of employees in different types of occupation is set out below in **Table C.1**.

**Table C.1: Employment by occupation (Jan 2021-Dec 2021)**

	Tonbridge and Malling	Great Britain
1: Managers, directors and senior officials	15.5%	10.5%
2: Professional occupations	19.6%	23.7%
3: Associate prof & tech occupations	13.9%	15.3%
4: Administrative and secretarial occupations	10.2%	10.2%
5: Skilled trades occupations	N/A	8.8%
6: Caring, leisure and other service occupations	N/A	9.2%
7: Sales and customer service occupations	N/A	6.9%
8: Process, plant and machine operatives	N/A	5.5%
9: Elementary occupations	10.8%	9.6%

**C.6** Data published from the ONS via Nomis (2014) indicates that residents were commuting out of the borough to attain highly skilled employment, and individuals were commuting into the borough from surrounding districts to fulfil lower skilled employment<sup>13</sup>. Projections indicate an increase supply of lower skilled jobs within the borough, resulting in an over-reliance on in-commuting from surrounding areas.

**C.7** **Table C.2** provides employment and unemployment rates in Tonbridge and Malling. The local employment rate (80.6%)

remains considerably above the national rate (74.8%). The local unemployment rate (3.0%) remains below the national figure (4.4%).

**Table C.2: Employment and unemployment rates<sup>14</sup>**

For October 2018 – September 2019	Tonbridge and Malling	South East	Great Britain
Employment rate – aged 16-64	81.6%	77.6%	74.8%
Unemployment rate – aged 16-64	3.0%	3.8%	4.4%

**C.8** Within the borough, 81.6% residents are economically active. This is higher than both the South East (80.8%) and Great Britain (78.4%).

**C.9** Within Tonbridge and Malling, 67.2% of the economically active population aged 16-64 work full time and 31.1% work part time. In Great Britain, 67.9% work full time and 32.1% work part time.

**C.10** The Inter Departmental Business Register (ONS) data in 2021 recorded a total of 6,140 businesses in the borough, 89% of which of these businesses were micro enterprises (employing less than 10 employees). This business composition is echoed throughout West Kent and the South-East<sup>15</sup>. The greatest providers of employment are wholesale and retail trade; repair of motor vehicles and motorcycles.

### Income

**C.11** In 2021 the average gross weekly pay for full time employees working in Tonbridge and Malling was £692.40, compared to £66.10 for the South East region and £613.10 across Great Britain<sup>16</sup>. Social Baseline

## Social Baseline

### Population

**C.12** The population of Tonbridge and Malling is 132,571 as of mid-2020 (48.8% male, 51.2% female)<sup>17</sup>. This is an increase of 11,766 since the 2011 Census. **Table C.3** below sets out

<sup>12</sup> Nomis labour market statistics for Tonbridge and Malling, available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157321/report.aspx#tabempunemp>

<sup>13</sup> Nomis (2014) Location of Usual Residence and Place of Work by Method of Travel. Available:

<https://www.nomisweb.co.uk/census/2011/wu03uk>

<sup>14</sup> ONS (2020) Annual Population Survey October 2018 – September 2019, Employment and Unemployment rates, available at: <https://www.nomisweb.co.uk/datasets/apsnew>

<sup>15</sup> Nomis labour market statistics for Tonbridge and Malling, available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157321/report.aspx#tabempunemp>

<sup>17</sup> ONS, Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

population growth in Tonbridge and Malling from 1991 to 2011 compared to England and Wales.

**Table C.3: Table C.3: Population growth 1991-2011**

	Tonbridge and Malling	England and Wales
1991	97,587	49.9 million
2001	107,561 (10.2% increase on 1991)	52 million (4.2% increase on 1991)
2011	120,805 (12.3% increase on 2001)	56.1 million (7.9% increase on 2001)

**C.13** Over the period 2021 to 2039 the population is projected to increase by 12.4% to 151,147. This value is greater than the wider county-level projection of a 10.6% increase in population in Kent between 2021 and 2039.

**C.14** **Table C.3** sets out the proportion of the population in each age group in Tonbridge and Malling. Those aged between 0 - 15 years old are larger proportion (20.4%) of the population than regionally (19.3) and nationally (18.0%). and the working age population is correspondingly smaller.

**C.15** The old age dependency ratio (OADR), defined as the number of people of State Pension age (SPA) 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 2021 and 2039. In 2021, there were 294.2 people of SPA per 1,000 people of working age. In 2039 it is

predicted that this number will increase by 22.5% to 360.5 people of SPA per 1,000 people of working age.

**C.16** As outlined by the above statistics, there will be a significant increase in ageing population within Tonbridge and Malling Borough between 2021 and 2039.

**C.17** According to the 2020 Mid-Year Population Estimates, Ward level population in Kent, approximately 70% of the total population in Tonbridge and Malling Borough is concentrated in urban areas, whilst the remaining 30% are distributed within rural areas. This figure reflects the same spatial distribution across Kent where 73% of individuals live in urban areas, and 27% live in rural. This spatial distribution across the borough has remained stable across the 2019 and 2020 mid-year population estimates.

**Table C.4: Population comparisons by age group (2020)<sup>18</sup>**

Age	Tonbridge and Malling		South East		England and Wales	
	Number	%	Number	%	Number	%
Total	132,571	100.0	9,217,265	100.0	59,719,724	100.0
Aged 0 - 15	27,087	20.4	1,774,415	19.3	10,742,440	18
Aged 16 - 64	80,297	60.5	5,630,846	61.1	37,844,675	63
Aged 65 and over	25,187	19.0	1,812,004	19.7	11,132,609	19

<sup>18</sup> ONS (2020) Population estimates for the UK, England, and Wales, Scotland and Northern Ireland: mid-2020. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationand>

[dmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2020](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2020)

## Deprivation

**C.18** 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 neighbourhood level, Tonbridge and Malling contains 72 Lower Super Output Areas (LSOAs), three of which are within the most deprived 20% of areas nationally. These are located within East Malling, Trench and Aylesford South. The lowest ranking area in the borough (Tonbridge and Malling 003A within East Malling) falls within the most deprived 13% of areas nationally. Generally, Tonbridge and Malling is an affluent area, with 16 of the 72 LSOAs within the least deprived 10% of areas nationally. The highest ranking area is Tonbridge and Malling 010B within Hildenborough and is within the least deprived 1%, highlighting the range of inequality within the borough<sup>19</sup>.

**C.19** Within Tonbridge and Malling Borough, the highest levels of deprivation are within the Trench Ward in Tonbridge. In 2019, this ward was ranked within the 20% most deprived neighbourhoods in the country.

**C.20** 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, Shipbourne, across to Mereworth and up along the western side of Snodland are shown to have the least proximity to these services, suggesting poor accessibility. There are some pockets of improved accessibility across all indicators in Borough Green centre, 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.21** The proportion of rough sleepers in Kent by local authority data has increased from 1.6% to 5.9% from 2010-2020. According to Kent Analytics, of the six estimated rough sleepers in Tonbridge and Malling Borough, three individuals are between 18-25. Compared across Kent, the estimated number of rough sleepers in Tonbridge and Malling Borough is lower than five out of twelve local authorities<sup>20</sup>.

**C.22** According to the Index of Multiple Deprivation : Headline findings for Kent, Tonbridge and Malling Borough has experienced the largest increase in deprivation relative to other districts in the county<sup>21</sup>. According to a Kent County Council report on Child Poverty from Kent Analytics (2021), 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<sup>22</sup>.

## Education

**C.23** Within Tonbridge and Malling Borough there are 59 schools and colleges, including public and private education providers. The Commissioning Plan for Education Provision in Kent from 2021-2025, published by Kent County Council, indicates that within Tonbridge and Malling Borough there will be sufficient primary school provision until 2025, with local place pressure within Tonbridge South, West Malling, East Malling and Snodland. It is likely that there will be some additional pressures within the secondary sector, with deficits in selective and/or non-selective places across Sevenoaks, Borough Green, Tonbridge, and Tunbridge Wells. Across into Maidstone, there will be sufficient primary school places, however there is forecasted pressure for selective and non-selective places within the secondary sector.

**C.24** The 2018/2019 Index of Multiple Deprivation (IMD) Score by School and Home District in Tonbridge and Malling Borough indicates the school district is relatively less deprived than the Kent average. In the borough, 20% of individuals aged 16-74 have no academic, vocational, or professional qualifications, this is slightly lower than the national average of 22%. Approximately 37% of residents aged 16 and over have gained the equivalent of 1-4 GCSE's, this is higher than the national average of 34%. However, the percentage of Tonbridge and Malling Borough residents with a degree is slightly below the national average.

## Housing

**C.25** At the 2011 Census there were 48,140 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

<sup>19</sup> Indices of Multiple Deprivation 2019 map. Available at: [http://dclgapps.communities.gov.uk/imd/iod\\_index.html#](http://dclgapps.communities.gov.uk/imd/iod_index.html#)

<sup>20</sup> Kent County Council (2021) Estimated Rough Sleepers in Kent: Autumn 2021. Available: [https://www.kent.gov.uk/\\_data\\_assets/pdf\\_file/0020/91361/Rough-sleepers-in-Kent-report.pdf](https://www.kent.gov.uk/_data_assets/pdf_file/0020/91361/Rough-sleepers-in-Kent-report.pdf)

<sup>21</sup> Kent County Council (2020) The Index of Multiple Deprivation (IMD2019): Headline findings for Kent. Available : [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0006/7953/Indices-of-Deprivation-headline-findings.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0006/7953/Indices-of-Deprivation-headline-findings.pdf)

<sup>22</sup> Kent County Council (2021) Child Poverty. Available: [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0009/7956/Children-in-poverty.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0009/7956/Children-in-poverty.pdf)

Tonbridge and Malling compared to nationally is summarised below:

- 24.0% of households are single-person households; compared to a national figure is 30.2%.
- 9.5% of households are lone-parent households; nationally the figure is 10.6%.
- 51.1% of households are comprised of couples; nationally the figure is 45.3%.
- 32.6% of the population of Tonbridge and Malling own their property outright and 38.6% own their property with a mortgage or a loan. This means that 71.2% of Tonbridge and Malling residents are owner-occupiers compared to a figure of 63.3% nationally.
- 26.2% of the Tonbridge and Malling population rent their properties<sup>23</sup>.

**C.26** Average house prices across Tonbridge and Malling Borough have increased by 12% between 2018 and 2021. According to ONS median residential property prices for administrative geographies data, the median house price (2021) in the borough was £370,000, this is significantly higher than the English median residential property price by approximately £104,000<sup>24</sup>.

**C.27** The 2020 housing affordability ratio (ONS, 2020) 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. The 2020 housing affordability ratio indicates that the Tonbridge and Malling Borough (11.79) is less affordable than surrounding areas of Medway (7.57), Gravesham (8.4), and Maidstone (10). However, the borough is slightly more affordable than neighbouring areas of Sevenoaks (12.59) and Tunbridge Wells (13.27).

**C.28** The Housing Delivery Test Action Plan (2021) states that, as of March 2020, the Council can demonstrate 2.93 years of housing land supply. This figure was generated from the standard method, which was 843 dwellings per annum<sup>25</sup>.

**C.29** According to the 2011 Census (ethnic group by measures data), 350 people within the borough identified themselves to be of 'Gypsy/Traveller/Irish Traveller' ethnicity. In comparison, there were 322 people within Tunbridge Wells, 320 people in Gravesham, 391 people in Sevenoaks and 838 people in Maidstone who identified themselves as being of 'Gypsy/Traveller/Irish Traveller' ethnicity<sup>26</sup>.

## Health

**C.30** The average female life expectancy in Tonbridge and Malling is 84.4 years and the average male life expectancy is 80.4 years. This is just above the England's average life expectancy of 83.2 years and 79.7 years respectively<sup>27</sup>. However, life expectancy is 5.9 years lower for men and 7.5 years lower for women in the most deprived areas of Tonbridge and Malling Borough compared to the least deprived areas. A comparison between the life expectancies within Tonbridge and Malling Borough and surrounding local authorities is outlined in **Table C.4** below.

**Table C.4: Life Expectancy within Tonbridge and Malling Borough and surrounding Local Authorities (in years) (PHE, 2019)**

Local Authority	Male	Female
Tonbridge and Malling	80.4	84.4
Tunbridge Wells	81.3	84.5
Gravesham	79.2	83.2
Sevenoaks	82.1	84.2
Maidstone	80.2	83.3

<sup>23</sup> ONS (2011) 2011 Census. Available at: <https://www.ons.gov.uk/census/2011census>

<sup>24</sup> ONS (2021) Median House Prices for Administrative Geographies. Available: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/medianhousepriceforationalandsubnationalgeographiesquarterlyrollingyearhpssadataset09>

<sup>25</sup> Tonbridge and Malling Borough Council (2021) Housing Delivery Test Action Plan. Available: <https://www.tmbc.gov.uk/downloads/file/1784/hdt-action-plan-july21>

<sup>26</sup> ONS (2011) 2011 Census. Available at: <https://www.ons.gov.uk/census/2011census>

<sup>27</sup> Public Health England (2019) Life expectancy at birth for Tonbridge and Malling. Available at: [https://www.localhealth.org.uk/#bbox=533283,188784,113405,67146&c=indicator&i=t4.le\\_f\\_v&selcodgeo=E07000115&view=map10](https://www.localhealth.org.uk/#bbox=533283,188784,113405,67146&c=indicator&i=t4.le_f_v&selcodgeo=E07000115&view=map10)

Local Authority	Male	Female
Medway (Unitary Authority)	78.3	82.4
Kent	80.6	84.1
England	79.4	83.1

**C.31** Within Tonbridge and Malling, the percentage of adults classified as overweight or obese is 58.8% which is just below the national average of 60.3%. 14.8% of children aged six are identified as obese, which is below national average of 16.8%<sup>28</sup>. In the 2019/2020 National Child Measurement Program, 16.3% of children within Year 6 in Tonbridge and Malling Borough were classified as obese compared to the national average of 21%<sup>29</sup>.

**C.32** The rates of statutory homelessness, under 75 mortality rates from cardiovascular diseases, under 75 mortality rates from cancer, infant deaths and suicide within Tonbridge and Malling Borough, compared to surrounding local authorities are outlined in **Table C.5** below. On average, rates for all/most indicators within Tonbridge and Malling Borough are higher (and therefore worse) than Tunbridge Wells, Sevenoaks, and Gravesham, but lower (and therefore better) than Maidstone and Medway (PHE,2019).

**Table C.5: Health Profile Highlights for Tonbridge and Malling Borough and Surrounding Local Authorities (count of person) (PHE, 2019)<sup>30</sup>**

Local Authority	Statutory homelessness	Under 75 mortality rate from cardiovascular diseases	Under 75 mortality rate from cancer	Infant mortality rate	Suicide rate
Tonbridge and Malling	16	216	417	12	37
Tunbridge Wells	5	181	365	7	33
Gravesham	27	180	355	10	34
Sevenoaks	10	182	417	8	27
Maidstone	165	243	556	13	52
Medway (Unitary Authority)	186	484	986	38	62

**C.33** The rate for alcohol-related harm hospital admissions is 543 per 100,000 people for Tonbridge and Malling and represents 685 admissions per year, which is better than the average for England<sup>31</sup>.

**C.34** 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 Clinical Commissioning Group (CCG). From April 2021,

the West Kent ICP became responsible for the commissioning duties of West Kent CCG. Within the West Kent ICP there are 9 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

<sup>28</sup> Public Health England (2020) Local Authority Health Profiles. Available at :<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/101/are/E07000115>

<sup>29</sup> Kent Community Health NHS Foundation Trust (2018) District School Health Plan, School Public Health Service 2018/19, Tonbridge and Malling

<sup>30</sup> Public Health England (2020) Local Authority Health Profiles. Available at :<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/101/are/E07000115>

<sup>31</sup> Public Health England (2020) Local Authority Health Profiles. Available at :<https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/ati/101/are/E07000115>

- Malling PCN: Phoenix Medical Practice, Snodland Medical Practice, Thornhills Medical Practice, Wateringbury 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.35** 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 at Pembury. Hospice care is provided at the Hospice in the Weald (Pembury).

**C.36** The West Kent CCG Health Needs Assessment (2018) 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<sup>32</sup>.

**C.37** There are approximately 12 care homes regulated by the Care Quality Commission (CQC) in the borough. There are also 9 different services offering specialist support for individuals with autism, and 12 different services offering support for individuals with dementia. There are also four different foodbanks within the borough. The Royal British Legion Industries (RBLI) 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.

## Crime Rates

**C.38** Crime statistics indicate that there is a comparatively lower level of crime in Tonbridge and Malling Borough than the national average.

**C.39** There were 8,803 crimes reported in year ending December 2021 in Tonbridge and Malling. This is a decrease of 5% when compared to the previous year<sup>33</sup>.

**C.40** In March 2020, the ONS Crime Severity Score (CSS) for total recorded crime in Tonbridge and Malling Borough was 10.3, compared to the national average of 13.8. The offence rate per 1,000 individuals was 76, compared to the national average of 89.

## Active Leisure Facilities and Participation

**7.6** The latest data for participation in sport and physical activity is from the Active People Survey undertaken by Sport England to measure sport participation rates across Local Authority Areas in the UK in 2015/2016. This data demonstrated a 4.4% decrease in survey results from 2014/2015. However, Tonbridge and Malling Borough showed the second greatest increase in participation across the county since the 2005/2006 survey<sup>34</sup>.

**7.7** 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.

**7.8** The delivery of many sport and leisure facilities is managed by Tonbridge and Malling Leisure Trust (TMLT). The not-for-profit organisation manages six key facilities across the borough: Larkfield Leisure Centre, Angel Centre, Tonbridge Swimming Pool, Poulton 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 disabled.

## Leisure, Open Space and Recreation

**C.41** There are numerous amenity green spaces and natural green spaces across Tonbridge and Malling Borough. Evaluating the provision of these against population statistics in 2011 indicated there has been a decrease of 0.92% in provision per 1,000 population. Using Fields In Trust (FiT) Guidance for Outdoor Sport and Play, the provision of Children's and Young People's Play Areas did not achieve national benchmarks of 0.55 ha per 1,000 population.

**C.42** The Old Chalk New Downs project funded by the Heritage Lottery Fund, due to end in 2022, is currently aiming to restore the chalk grassland habitat whilst connecting communities to the natural environment.

**C.43** Within the borough there is also Haysden Country Park, located in the western outskirts of Tonbridge. It is approximately 65ha and includes a series of river, grassland, marshlands, woodlands, and freshwater lakes. The park offers activities for young people, fishing, sailing and open water swimming. Manor Park Country Park managed by Kent

<sup>32</sup> West Kent Clinical Commissioning Group (2018) Health Needs Assessment. Available [https://www.kpho.org.uk/\\_\\_data/assets/pdf\\_file/0020/93080/West-Kent-Needs-Assessment-compressed.pdf](https://www.kpho.org.uk/__data/assets/pdf_file/0020/93080/West-Kent-Needs-Assessment-compressed.pdf)

<sup>33</sup> ONS (2021) Recorded crime data by Community Safety Partnership area, available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/recordedcrimedatabycommunitysafetypartnershiparea>

County Council (KCC) is located near West Malling. The park is approximately 21 ha, within this there are four distinct sections; the lake, the Abbey Field and Chestnut Paddocks, the Ice House field, and Douce's meadow.

**C.44** Within the borough there is also Leybourne Lakes Country Park located in Aylesford. The park is approximately 93 ha and includes multiple lakes, wildflower meadows and wetlands. There are a range of facilities for visitors of the country park including walking route and guided trails.

**C.45** There are two AONBs in the borough. The Kent Downs in the north and a small section of High Weald AONB in the south.

**C.46** Due to being largely rural in nature, Tonbridge and Malling Borough is fortunate to have ready access through a dense Public Rights of Way (ProW) network 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.

## Environmental Baseline

### Climate Change and Renewable Energy

#### UKCP18 climate projections

**C.47** The met office released its most up to date UK climate projections in July 2021<sup>35</sup>. These provide an assessment of how the climate of the UK may change over the 21st century. The headline finding is that there is a greater chance of warmer, wetter winters and hotter, drier summers. All areas of the UK are projected to experience warming, with warming greater in the summer than the winter. Future temperature rise depends on the amount of greenhouse gases the world emits. The lowest scenario is compatible with aims to limit global warming since pre-industrial levels to below 2°C. The highest scenario will likely require significant further adaptation. Sea-level rise will occur for all emission scenarios.

**C.48** The Tonbridge and Malling Council 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 between 2020 and 2010, Tonbridge and Malling Borough stay within a maximum cumulative CO<sub>2</sub> emissions budget of 6.4 million tonnes (MtCO<sub>2</sub>)<sup>36</sup>. According to 2017 CO<sub>2</sub> 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.49** The transport sector contributes significantly to CO<sub>2</sub>, since 2013 there has been a 7% increase in emissions within the borough. Collaborating with Kent County Council, Tonbridge and Malling Borough 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 (ULEV).

**C.50** 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. At present, the borough council is working with Kent County Council to produce a Kent and Medway Climate Change Adaptation Programme and Implementation Plan.

**C.51** 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.52** Carbon dioxide is the principle Greenhouse Gas. A Climate Emergency Strategy and Action plan was adopted in July 2019. These set out the key principles which outline how the council will address the causes and consequences of climate change and includes an aim for Tonbridge and Malling to become a carbon neutral council and a carbon neutral area by 2030. This is detailed on the Climate Emergency page on the council website<sup>37</sup>.

**C.53** 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:

<sup>35</sup> UK Climate Projections: Headline Findings July 2021, available at: [https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18\\_headline\\_findings\\_v3.pdf](https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18_headline_findings_v3.pdf)

<sup>36</sup> [Tonbridge and Malling Borough Council \(2019\) Climate Change Strategy 2020-2030](#). Available:

<https://www.tmbc.gov.uk/downloads/file/1793/tmbc-climate-change-strategy>

<sup>37</sup> <https://www.tmbc.gov.uk/climate-change/climate-change-1>

- Stay within a maximum cumulative carbon dioxide emissions budget of 6.4 million tonnes (MtCO<sub>2</sub>) 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<sup>38</sup>.

**C.54** The Department for Business, Energy and Industrial Strategy (BEIS) provide annual statistics detailing greenhouse gas emissions at national and local authority level (**Table C.6**). The data is provided as a sub-set, which details those

emissions considered to be under the influence of local authorities, this removes motorway and aviation emission statistics. There is a roughly even split between industrial and commercial, domestic and transport-based emissions within this subset data. This data shows that the trend is a reduction in emissions over between 2005 – 2019. However, there is a very significant way to go to meet the local aspiration detailed under the climate emergency for carbon neutrality by 2030. It is worth noting that of Tonbridge and Malling’s neighbouring local authority areas, Tunbridge Wells (3.8t), Maidstone (3.6t) and Sevenoaks (3.9t) perform more favourably in terms of emissions per capita. Tonbridge and Malling performs more favourably than Gravesham (4.1t) in this regard.

**Table C.6: Carbon emissions in Tonbridge and Malling by sector<sup>39</sup>**

Year	Industry and Commercial	Public Sector	Domestic	Transport	Grand Total	Population ('000s, mid-year estimate)	Per Capita Emissions (t)
2005	229.8	27.9	280.0	230.2	767.7	111.7	6.9
2006	237.6	27.6	283.4	226.2	774.4	113.5	6.8
2007	229.4	25.4	277.5	230.4	762.6	115.5	6.6
2008	237.9	26.9	280.1	213.0	758.4	117.0	6.5
2009	207.6	23.5	257.7	201.7	690.7	118.5	5.8
2010	234.1	25.6	277.8	206.0	743.4	120.1	6.2
2011	218.3	22.6	242.5	199.7	683.0	121.1	5.6
2012	221.1	24.4	262.1	199.2	706.8	122.0	5.8
2013	210.0	23.4	256.7	193.5	683.7	123.2	5.6
2014	258.9	39.2	217.9	197.3	713.3	124.6	5.7
2015	174.3	20.6	213.9	203.5	612.3	125.8	4.9
2016	145.7	17.3	201.5	207.9	572.4	127.3	4.5
2017	136.4	13.9	189.6	207.0	546.9	128.9	4.2
2018	139.4	10.4	191.2	202.8	543.7	130.5	4.2
2019	133.8	8.0	185.5	200.1	527.4	132.2	4.0

**C.55** BEIS provides data for the total amount of energy from renewable technologies in Tonbridge and Malling. Renewable

electricity produced in Tonbridge and Malling, as at the end of 2020, is detailed in **Table C.7** below.

<sup>38</sup> Tyndall Centre (2022) Setting Climate Commitments for Tonbridge and Malling. Available at:

<https://carbonbudget.manchester.ac.uk/reports/E07000115/>

<sup>39</sup> ONS (2021) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2019, Available at:

<https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2019>

Table C.7: Renewable energy generation in Tonbridge and Malling (for 2020)<sup>40</sup>

	Number of sites	Capacity (MW)	Generation (MWh)
Photovoltaic	1,413	17.174	17,444
Onshore Wind	1	0.001	3
Anaerobic Digestion	1	1.334	7,362
Landfill Gas	4	6.198	19,434
Sewage Gas	2	0.660	3,096
Plant Biomass	2	0.186	1,028
Total	1,423	25.553	48,367

## Waste and Minerals

**C.56** The Minerals and Waste Local Development Framework is the responsibility of Kent County Council. Mineral Consultation Areas cover the Mineral Safeguarding Areas with additional areas to ensure that consultation takes place between county and district/borough planning authorities.

**C.57** 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 outlines measures to be taken to achieve the objective of ensuring that as much waste as possible is recycled. Throughout the plan period 2021-2030, 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.

**C.58** The 5-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 was over 2 million tonnes per annum of additional capacity across all waste streams.

**C.59** There are 32 recycling sites located across Tonbridge and Malling Borough. Across the borough there has been a significant reduction in waste to landfill over the recent years due to the recent opening of Kent Enviropower (Energy from Waste) facility in Allington. In 2018-2019, 41.9% of waste within the borough was recycled and composed. The Council aims to increase this level to over 50% in 2020/2021, in addition to reducing the overall mass of waste through minimisation of packaging. Between 2013-2020 the borough demonstrated a decrease of 12.1% of Residual Household Waste per Household (kg/h/hold).

**C.60** There are no household waste recycling centres located in Tonbridge and Malling Borough. The closest household waste recycling centres are located in the neighbouring boroughs of Sevenoaks, Tunbridge Wells, Medway and Maidstone.

## Transport Accessibility

**C.61** The 2011 Census data on method of travel to work reported that a greater percentage (60.2%) of individuals travel by car to work than the national average (55.9%). Fewer individuals utilise public transport networks and active modes of transport. The development of better cycling routes is identified within the Kent County Council's Active Travel Strategy and the Tonbridge and Malling Cycling Strategy (2014). There has also been the development of the Tonbridge 20 mph zone to encourage active modes of travel across the area.

**C.62** Key highway routes within the borough including the A20, M20, A21, A227, A228, M2, A25, A26, A229 and M26 roads. These roads connect the borough to wider transport networks including the M25 motorway and channel ports.

## Bus Travel

**C.63** 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 to neighbouring towns. However, some smaller bus operators which serve smaller populations, such as Borough Green, do not operate seven days a week.

## Cycling

**C.64** Cycling infrastructure throughout the borough is generally good, there is a cycle route linking Tonbridge and

<sup>40</sup> ONS, Renewable Energy Statistics 2021, available at: <https://www.gov.uk/government/statistics/regional-renewable-statistics>

Penshurst which forms part of the National Cycle Network. A Non-Motorised Unit (NMU) route links Tunbridge Wells North Farm 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.65** 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 aims to create continuous cycle routes by joining up existing routes and targeting important pathways.

### Rail Travel

**C.66** Within the borough 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.

## Natural Environment

### Biodiversity

**C.67** Tonbridge and Malling has a range of locations identified 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 ha in size, however, only part of this SAC is within the borough. Peters Pit is the second SAC within the borough, it is much smaller with an area of 28.3 ha.

**C.68** There are eleven Sites of Special Scientific Interest (SSSIs) wholly or within the borough, the largest of which are the Halling to Trotiscliffe Escarpment (600.6 ha in total) and Holborough to Burham Marshes (149.8 ha in total). Peters Pit SAC is also a SSSI.

**C.69** According to the latest available data from Kent Wildlife Trust, there are currently 48 Local Wildlife Sites (LWS) in the borough, the largest of which is Mereworth Woods in the middle of the borough. According to the latest data available from Natural England, within the borough, there are two Local Nature Reserves (LNR), Ditton Quarry Nature Reserve located towards Ditton in the north-east of the borough. There is also Haysden Nature Reserve, which includes Barden and Haysden Lakes.

**C.70** Table C.8 below outlines the international, national and local designated sites within the borough, along with their Natural England citations where appropriate. The location of these sites is shown on **Figure C.1**.

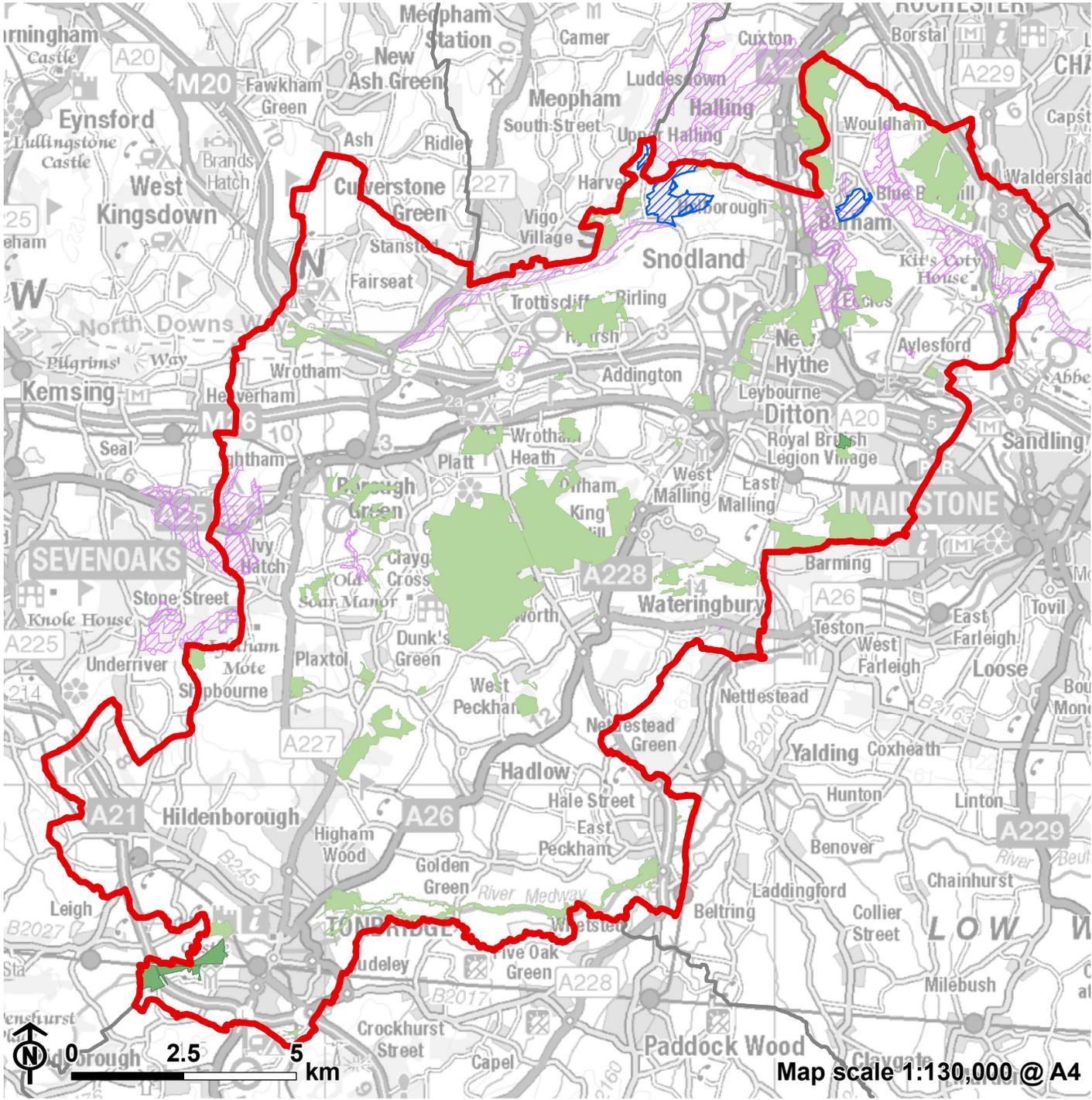
**Table C.8: European, National and Local Sites within Tonbridge and Malling Borough**

Site	Location	Qualifying Feature
<b>European Sites</b>		
North Downs Woodland SAC	Parcels North of Snodland and East of the A229	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	North of Burham	Triturus cristatus; Great crested newt.
<b>National Sites</b>		
Wouldham to Delting Escarpment SSSI	North east (east of Burham)	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	East (south of Wateringbury)	The site contains a tufa deposit (soft calcium carbonate commonly precipitated by prings which have flowed through chalk or limestone). It is important for Quaternary studies.

Site	Location	Qualifying Feature
Trotiscliffe Meadows SSSI	North (south of Trotiscliffe)	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	North (north of Burham)	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	West (north of Shipbourne)	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	West (west of Borough Green)	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 Hill Pits, Upper Halling SSSI	North (north of Holborough)	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	North (west of Burham)	The site lues 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 Trotiscliffe Escarpment SSSI	North west (north of Snodland)	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	West (south of Borough Green)	The site is a representative example of Wealden valley alderwood, with a rich flora including several locally distributed plants.
Aylesford Pit SSSI	East (north of Aylesford)	The pit dates back over a century providing exposures of Medway Terrace deposits overlying (Cretaceous) Folkestone Beds.
<b>Local Sites</b>		
Ditton Quarry LNR	North east	Area of open space providing habitat for wildlife and birds.
Haysden LNR	South west	Includes a variety of natural habitats including, grassland, freshwater lakes, marshland and woodland.



**Figure C.1: Ecological designations within Tonbridge and Malling**



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



Map scale 1:130,000 @ A4

EB:Horton\_K LUC  
FIG\_C\_1\_11963\_r0\_Ecological  
20/07/2022

Source: Natural England, Tonbridge and Malling Borough Council

**C.71** UK Biodiversity Action Plan (BAP) priority habitats are those identified as being the most threatened and requiring conservation (under the NERC Act 2006). Species of wildlife protected by legislation due to their rarity are considered protected species. Habitats and species with conservation designations, but no legal protection, are considered to be 'notable species'. According to the 2012 Kent Habitat Survey, it was identified that Tonbridge and Malling Borough contribute 22% of the Kent County heathland resources<sup>41</sup>. Further to this, Tonbridge and Malling Borough contribute 12% of the Kent County acid grassland resource, a habitat that had seen a decrease of approximately 40% since 1990 in the UK. Traditional Orchards within the borough constitute 11.9% of Kent's UK Biological Action Plan (UKBAP) priority habitat resource. Neutral grasslands constitute 6% of the district, forming 5.2% of the county resource. This represents 9.9% of the Annex 1 Lowland hay meadow habitat which is extremely rare habitat in the county.

**C.72** Kent Biodiversity Strategy 2020-2045 states that Kent is home to 36 priority habitats and 387 priority species<sup>42</sup>. For the purpose of the strategy, 17 priority habitats and 13 species have been identified for which efforts should be specifically focused and targets set.

**C.73** Priority habitats:

- Lowland beech and yew woodland
- Lowland mixed broadleaved woodland
- Chalk grassland
- Lowland meadow
- Lowland dry acid grassland / lowland heathland
- Hedgerows
- Brownfield
- Traditional orchard
- Rivers
- Chalk streams
- Ponds
- Coastal and floodplain grazing marsh
- Intertidal mudflats and coastal saltmarsh
- Wet woodland

- Vegetated shingle
- Intertidal chalk and subtidal chalk (nominated)
- Subtidal mud (nominated)

**C.74** Priority species:

- Shrill carder bee
- Turtle dove
- Nightingale
- Swift
- Adder
- Adonis blue
- Heath fritillary
- Dwarf or Kentish milkwort
- European eel
- Lapwing
- Sandwich tern
- Water vole
- True Fox-sedge

**Landscape**

**C.75** Two AONBs designated by Natural England partially fall within the borough boundary. The Kent Downs AONB is situated along the northern and western boundaries of the borough. There is also a small area of the High Weald AONB in the south of the borough, both AONB have Management Plans adopted by the Council. Combined, the AONBs constitute approximately 26% of the borough. **Figure C.2** below shows the location of the AONBs within the borough.

**C.76** As outlined by Natural England, there are four National Character Areas (NCA) within the borough: High Weald, Low Weald, Wealden Greensand, and North Downs<sup>43</sup>.

**C.77** Approximately 11% of the borough is covered by Ancient Woodland, equating to 2,621 ha. The 2012 Kent Habitat survey recorded the condition and extent of natural habitats in Tonbridge and Malling Borough Council. The survey reported that Tonbridge and Malling Borough Council land cover was largely characterized by Grassland, Arable and Development,

<sup>41</sup> Assessing Regional Habitat Change (ARCH) (2012) Kent Habitat Survey 2012. Available : [https://www.kent.gov.uk/\\_data/assets/pdf\\_file/0019/95104/Kent-Habitat-Survey-2012-section-1-executive-summary.pdf](https://www.kent.gov.uk/_data/assets/pdf_file/0019/95104/Kent-Habitat-Survey-2012-section-1-executive-summary.pdf)

<sup>42</sup> Kent Nature Partnership (2020) Kent Nature Partnership Biodiversity Strategy 2020 to 2045.

Available:<https://kentnature.org.uk/wp-content/uploads/2022/01/Kent-Biodiversity-Strategy-2020.pdf>

<sup>43</sup> [Natural England \(2014\) National Character Area profiles.](https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles)

Available:<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles>

and this land cover composition had remained relatively stable since 1990.

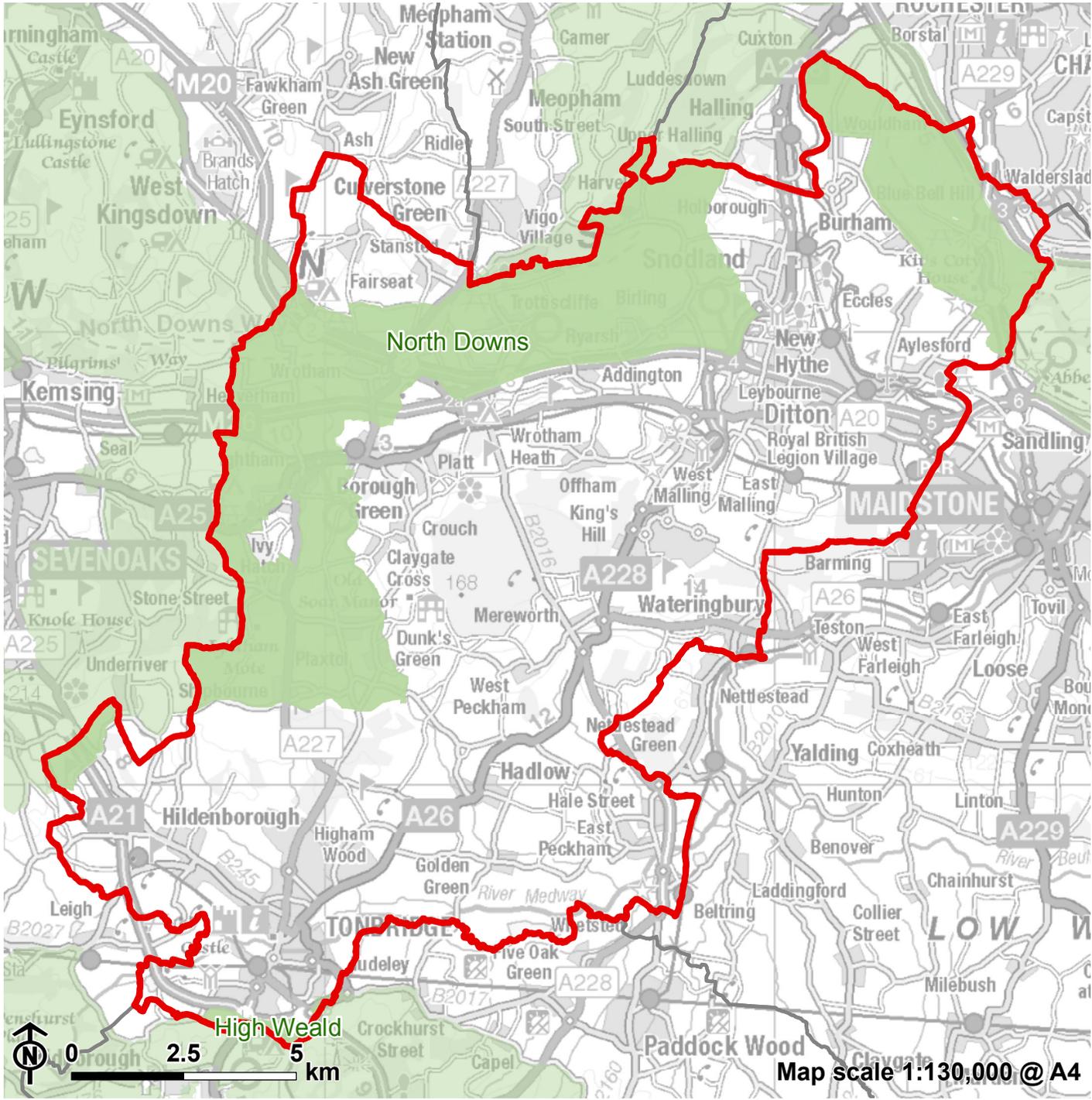
**C.78** The Landscape Assessment of Kent outlines that the borough is classified into 32 Landscape Character Areas (LCA) as shown on **Figure C.3** below.

### Green Belt

**C.79** Approximately 71.1% of the borough is covered by the Metropolitan Green Belt (DLUHC, 2021). **Figure C.4** illustrates the extent of the borough designated as Green Belt.



**Figure C.2: Location of AONBs within Tonbridge and Malling**



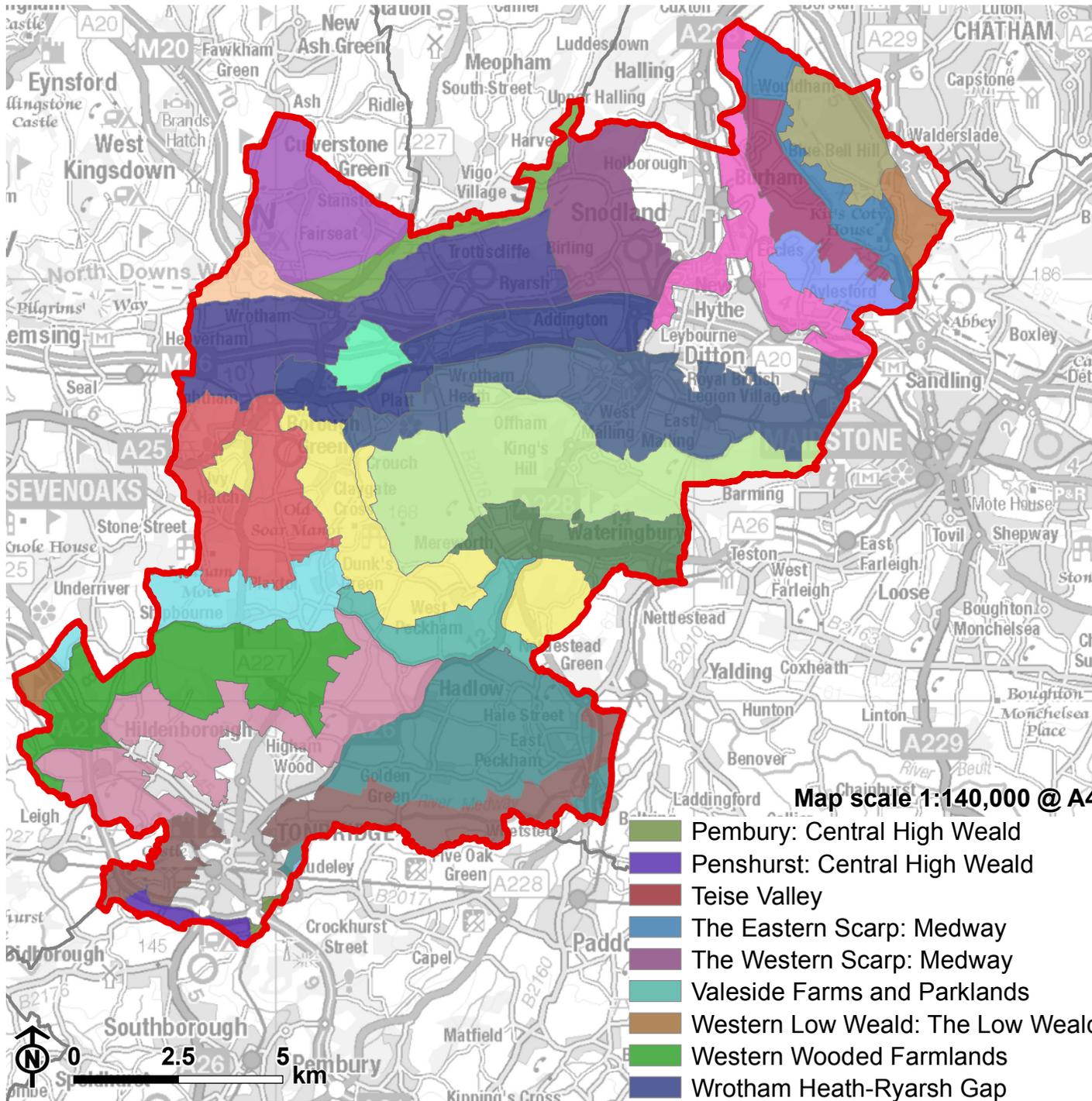
- Tonbridge and Malling Boundary
- Neighbouring local authority
- Area of Outstanding Natural Beauty

EB:Horton\_K LUC  
FIG\_C\_2\_11963\_r0\_AONB\_Location  
20/07/2022

Source: Natural England, Tonbridge and Malling  
Borough Council



**Figure C.3: Landscape Character Areas across Tonbridge and Malling**

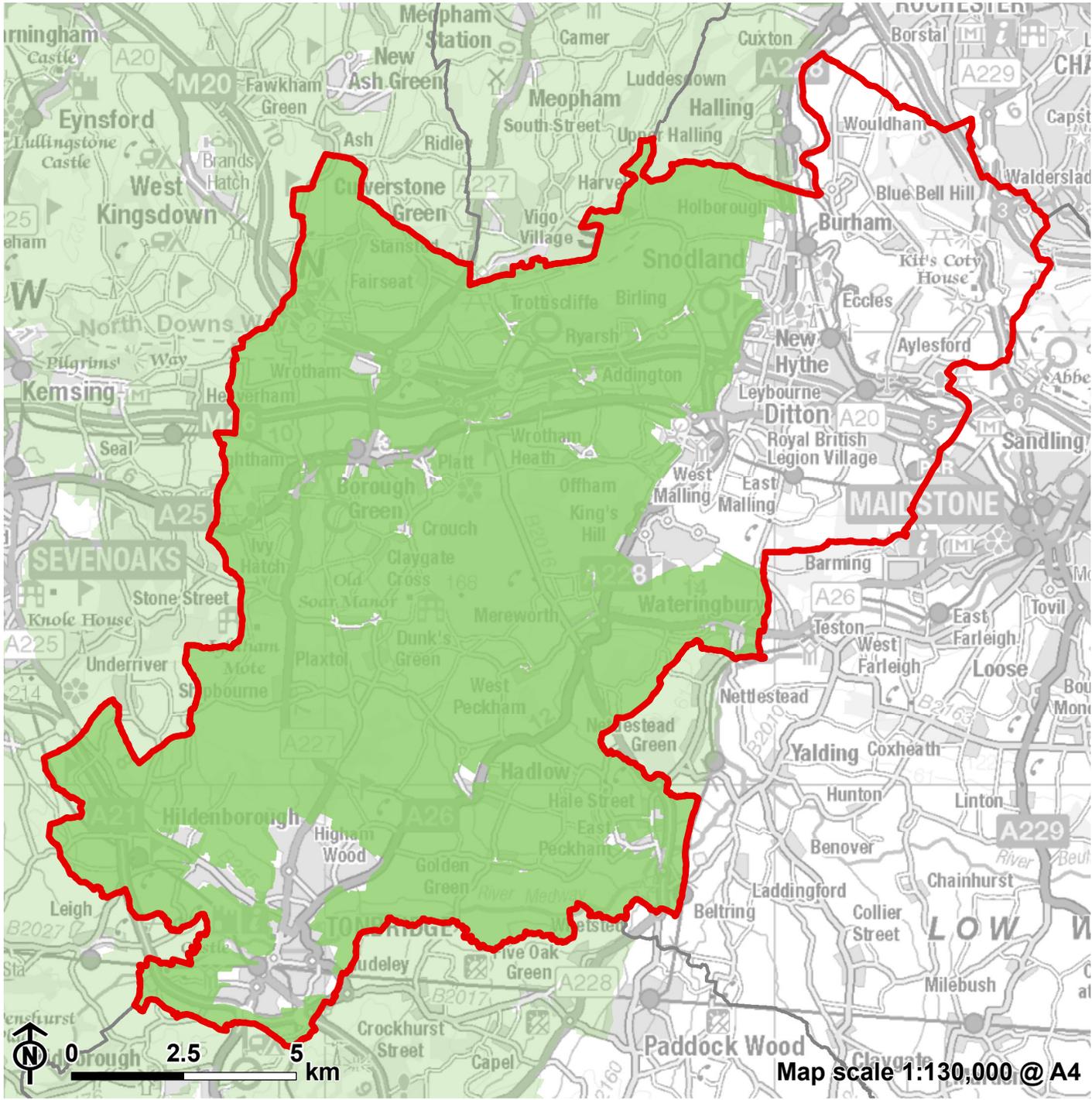


- Tonbridge and Malling Boundary
- Neighbouring local authority
- Ash Downs
- Boxley Vale: Medway
- Chatham Outskirts: Mid Kent Downs
- Eastern Low Weald: The Low Weald
- Greensand Fruit Belt - Malling
- Greensand Fruit Belt - Watlington
- Greensand Ridge - Plaxtol
- Hildenborough-Leigh Farmlands
- Hollingbourne Vale West
- Ightham Greensand: Sevenoaks Ridge
- Kemsing Vale
- Kemsing Vale - Kent Downs
- Kent Downs - Medway, Western & Eastern Scarp
- Kent Fruit Belt: Kentish High Weald
- Kingdown: West Kent Downs
- Low Weald Fruit Belt
- Luddesdown: West Kent Downs
- Medway Valley
- Medway Valley - Medway Valley Upper
- Medway Valley, Medway Valley Lower
- Mereworth Woodlands
- Nashenden Valley: Mid Kent Downs
- Pembury: Central High Weald
- Penshurst: Central High Weald
- Teise Valley
- The Eastern Scarp: Medway
- The Western Scarp: Medway
- Valeside Farms and Parklands
- Western Low Weald: The Low Weald
- Western Wooded Farmlands
- Wrotham Heath-Ryarsh Gap





**Figure C.4: The extent of Green Belt coverage across Tonbridge and Malling**



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

EB:Horton\_K LUC  
FIG\_C\_4\_11963\_r0\_GreenBelt  
20/07/2022

Source: DCLG, Tonbridge and Malling Borough Council

### Green Infrastructure, Open Space and Rights of Way

**C.80** There are numerous amenity green spaces and natural green spaces across Tonbridge and Malling Borough. Evaluating the provision of these against population statistics in 2011 indicated there has been a decrease of 0.92% in provision per 1,000 population. Using Fields In Trust (FIT) Guidance for Outdoor Sport and Play, the provision of Children's and Young People' Play Areas did not achieve national benchmarks of 0.55 ha per 1,000 population.

**C.81** The Old Chalk New Downs project funded by the Heritage Lottery Fund, due to end in 2022, is currently aiming to restore the chalk grassland habitat whilst connecting communities to the natural environment.

**C.82** Within the borough there is also Haysden Country Park, located in the western outskirts of Tonbridge. It is approximately 65 ha and includes a series of river, grassland, marshlands, woodlands, and freshwater lakes. The park offers activities for young people, fishing, sailing and open water swimming. Manor Park Country Park managed by Kent County Council (KCC) is located near West Malling. The park is approximately 21 ha, within this there are four distinct sections; the lake, the Abbey Field and Chestnut Paddocks, the Ice House field, and Douce's meadow.

**C.83** Within the borough there is also Leybourne Lakes Country Park located in Aylesford. The park is approximately 93 ha and includes multiple lakes, wildflower meadows and wetlands. There are a range of facilities for visitors of the country park including walking route and guided trails.

**C.84** There are two AONBs in the borough. The Kent Downs in the north and a small section of High Weald AONB in the south.

**C.85** Due to being largely rural in nature, Tonbridge and Malling Borough is fortunate to have ready access through a dense Public Rights of Way (ProW) network 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.

### Soils and Geology

**C.86** 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 acid loamy soils which is also found towards the southern boundary of the borough. The central area of the borough is characterised by areas of slightly acidic loamy and clayey soils some of which is slowly permeable or freely draining.

**C.87** The bedrock geology of the borough is characterised by two key bedrock geologies. The northern area of the borough

is largely constituted by Lower Greensand Group, which is sandstone and Mudstone. The southern area within the borough is largely 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.88** Regionally important geological and geomorphological sites (RIGS) are locally designated sites of regional and local importance for geodiversity. Within the borough, there are 9 RIGS identified, as outlined in the Managing Development and the Environment Development Plan Document (2010). These are primarily located in the northern areas of Wealden Greensand and the North Downs as illustrated on **Figure C.5**.

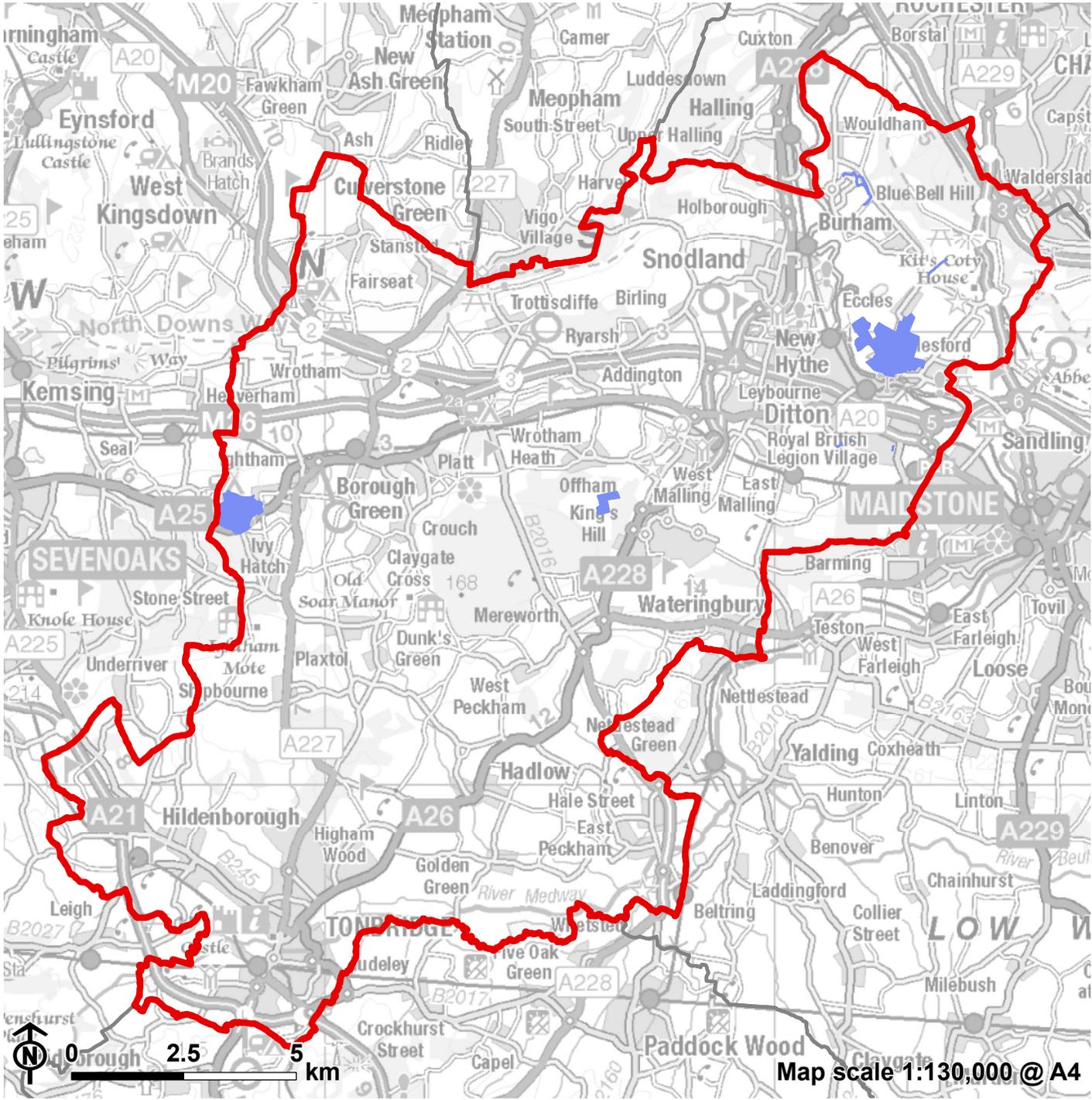
**C.89** Agricultural land is graded from 1 to 5 with the highest grade (1) going to land that is versatile, produces a consistent high yield/output and requires less input. Agricultural land that is considered best and most versatile (BMV) is graded 1 to 3a.

**C.90** According to Agricultural Land Classification (ALC) Grades – Post 1988 published by Natural England and most recently updated in 2020, 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 Wateringbury.

**C.91** 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.92** There are multiple current and historic landfill sites within the borough, according to publicly available data from the Department of Environment, Food and Rural Affairs (Defra, 2021). 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 on **Figure C.6**.

**Figure C.5: Location of RIGS within Tonbridge and Malling**



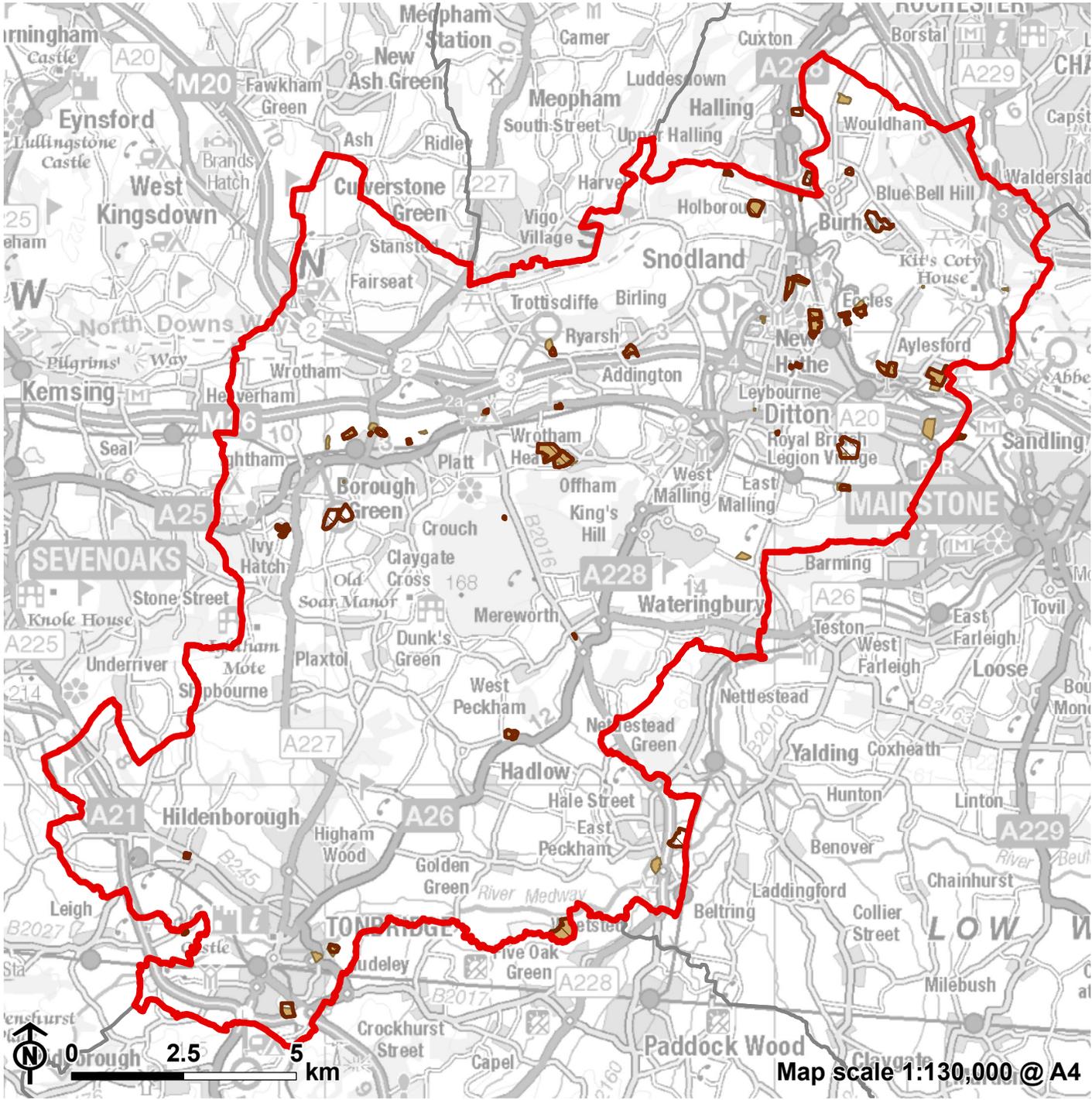
- Tonbridge and Malling Boundary
- Neighbouring local authority
- Regionally Important Geological Site (RIGS)

EB:Horton\_K LUC  
FIG\_C\_5\_11963\_r0\_RIGS  
20/07/2022

Source: Natural England, Tonbridge and Malling Borough Council

Map scale 1:130,000 @ A4

**Figure C.6: Landfill Sites within  
Tonbridge and Malling**



-  Tonbridge and Malling Boundary
-  Neighbouring local authority
-  Authorised landfill site
-  Historic landfill site

EB:Horton\_K LUC  
FIG\_C\_6\_11963\_r0\_Landfill\_site  
20/07/2022

Source: Environment Agency, Tonbridge  
and Malling Borough Council

Map scale 1:130,000 @ A4

### Historic Environment

**C.93** 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.94** In terms of key assets in the historic environment, Tonbridge and Malling has:

- 61 Conservation Areas
- Over 1,300 Listed Buildings
- 25 Scheduled Ancient Monuments
- 23 Historic Parks and Gardens (Five of which are of national interest)

**C.95** Within the borough, four heritage assets were identified on the Historic England Heritage at Risk Register (HAR) in 2020, as outlined in **Table C.9**<sup>44</sup>. The condition of these assets ranged between 'poor' to 'extensive significant problems'.

**Figure C.7** illustrates the heritage assets present in Tonbridge and Malling.

**C.96** Across the borough there are 61 conservation areas, these are buildings, spaces and landscapes which contribute to the areas architectural and historic character. These areas are protected under additional legislation, therefore any future development within proximity or within these areas are subject to additional planning controls.

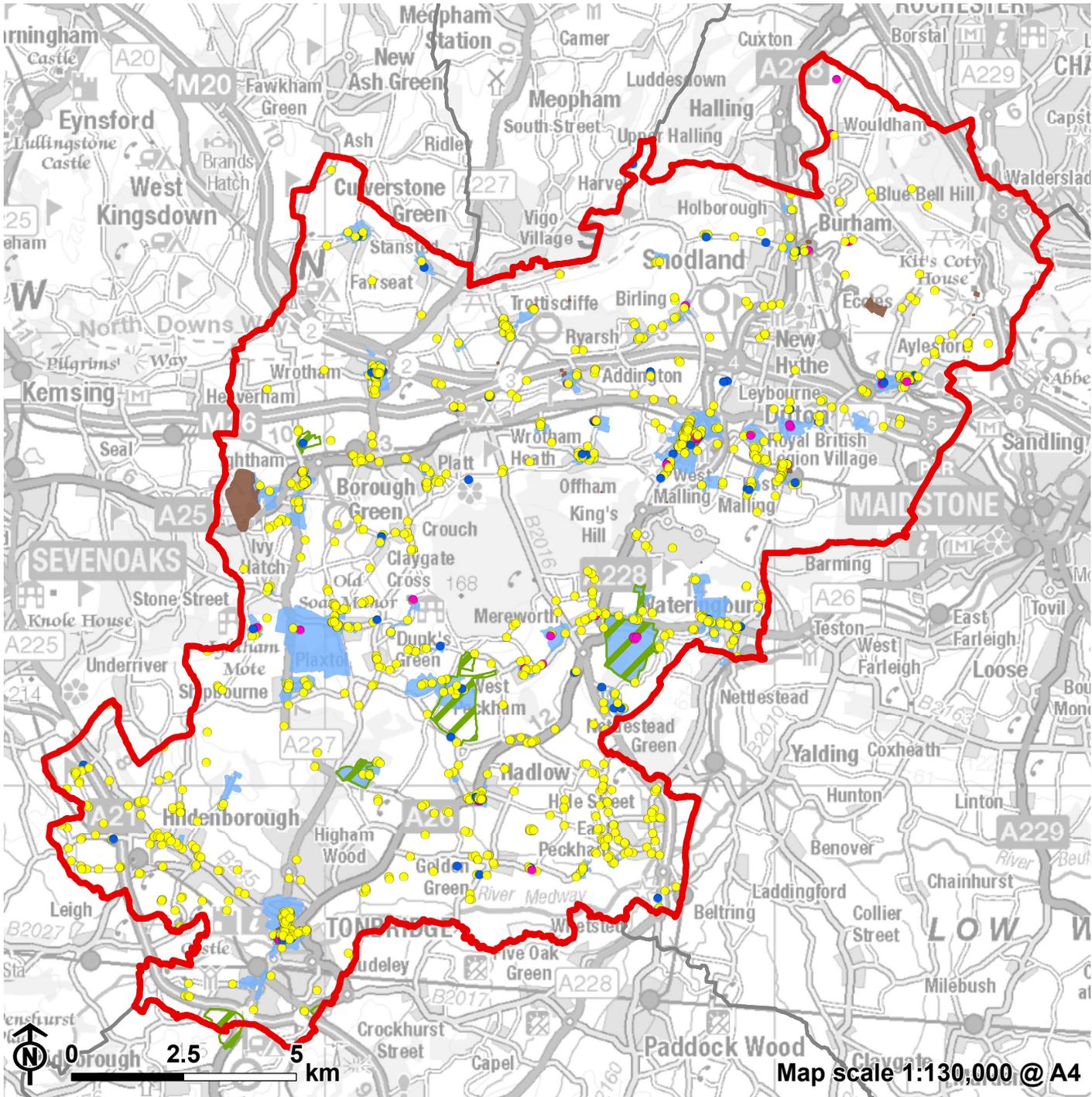
**Table C.9: Heritage Assets in Tonbridge and Malling Borough included on the Historic England Heritage at Risk Register**

Site Nam	Designation	Condition
Church of All Saints, Snodland	Listed Place of Worship, Grade I	Poor
Town Banks, Tonbridge	Scheduled Monument	Generally unsatisfactory with major localised problems
Romano-British villa, Anglo-Saxon cemetery and associated remains at Eccles, Aylesford	Scheduled Monument	Extensive significant problems
Chapel of St Blaise, Offham	Scheduled Monument	Generally unsatisfactory with major localised problems

<sup>44</sup> Historic England (2021) Heritage at Risk Register. Available: <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>



**Figure C.7: Heritage assets present in Tonbridge and Malling**



- Tonbridge and Malling Boundary
- Neighbouring local authority
- Registered historic parks and gardens
- Conservation area
- Scheduled monument
- Grade I Listed building
- Grade II\* Listed building
- Grade II Listed building

EB:Horton\_K LUC  
 FIG\_C\_7\_11963\_r0\_Hertiage  
 20/07/2022

Source: Historic England, Tonbridge and  
 Malling Borough Council

## Air Quality

**C.97** The Tonbridge and Malling Borough Air Quality Annual Status Report in 2020 indicated that the main source of air pollution within the borough is road traffic from main A roads and the M20<sup>45</sup>. Consequently, 7 AQMAs have been declared, relating to emissions from motor vehicles. All the AQMA's are exceeding the annual NO<sub>2</sub> objective, and the M20 AQMA is also in exceedance of particulate matter. These AQMAs are outlined below and illustrated in **Figure C.8**:

- AQMA No.1 (M20)
- Maidstone Borough Air Quality Management Area
- Aylesford AQMA
- Larkfield AQMA
- Tonbridge High Street AQMA
- Wateringbury AQMA
- AQMA No.7 (Borough Green)

**C.98** The Tonbridge and Malling Borough Council Air Quality Action Plan 2022 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<sup>46</sup>. This will help reduce the levels of harmful pollutants and the potential threat to health and wellbeing of the population within the borough.

**C.99** 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

## Water Environment

**C.100** There are several aquifers concentrated around Aylesford and Snodland which are used for abstractions for public water supply. There are over one hundred licensed abstraction points. The borough's drinking water is supplied by South East Water. As a portion of the drinking water is abstracted from the groundwater, the Environment Agency (EA) has outlined source protection zones.

**C.101** 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.

**C.102** 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. In 2013, the Tonbridge and Malling Stage 1 Surface Water Management Plan identified the main rivers within the borough. '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.103** According to the Environment Agency designation of main rivers, there are 11 main rivers within the borough across two Catchment Flood Management Plan (CFMP) the North Kent Rivers and the Medway. These main rivers are listed below, and their spatial extent is illustrated on **Figure C.9**:

- 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
- Ditton Stream

**C.104** In 2019, 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,

<sup>45</sup> Tonbridge and Malling Borough Council (2020) Air Quality Annual Status Report. Available: <https://www.tmbc.gov.uk/downloads/download/57/tmbc-air-quality-report-2020>

<sup>46</sup> Tonbridge and Malling Borough Council (2022) Air Quality Action Plan. Available: <https://www.tmbc.gov.uk/downloads/file/2052/air-quality-action-plan>

in 2019 all the surface water bodies in this operational catchment were classified as 'Fail' for the chemical status<sup>47</sup>.

**C.105** Groundwater vulnerability maps identifies 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.

### Flood Risk

**C.106** 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 affects 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.107** 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.108** The Environment Agency Flood Map for Planning for fluvial flooding (i.e. from main rivers) illustrates that several areas have medium or high flood risk<sup>48</sup>. There are areas of Flood Zone 3 (high risk – land assessed as having a 1 in 100 or greater annual probability of flooding) 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. 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. The flood risk zones in Tonbridge and Malling Borough are outlined in **Figure C.10** below.

**C.109** The Environment Agency Flood Map for Planning for surface water flooding (i.e. from rainwater not draining away sufficiently) illustrates that surface water presents a significant risk throughout 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.

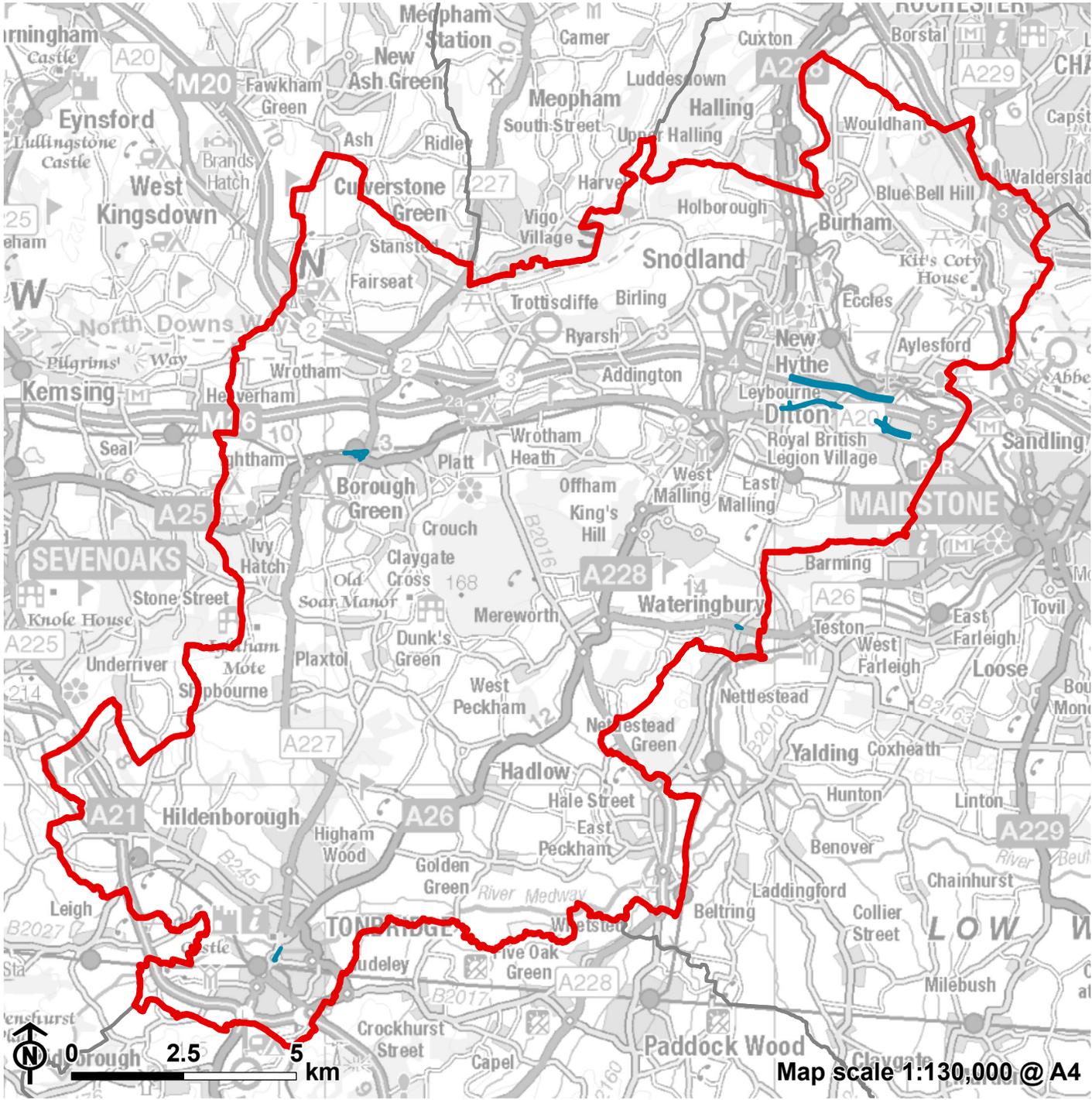
**C.110** According to the Environment Agency Flood Map for Planning (2021), there are areas within the borough that currently benefit from flood defences which reduce the risk of flooding there, such as the Leigh Flood Storage Area.

<sup>47</sup> Environment Agency (2021) Medway Middle Operational Catchment. Available: <https://environment.data.gov.uk/catchment-planning/OperationalCatchment/3314>

<sup>48</sup> Environment Agency (2021) Flood Map for Planning. Available: <https://flood-map-for-planning.service.gov.uk/>



**Figure C.8: Air Quality Management Areas across Tonbridge and Malling**



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

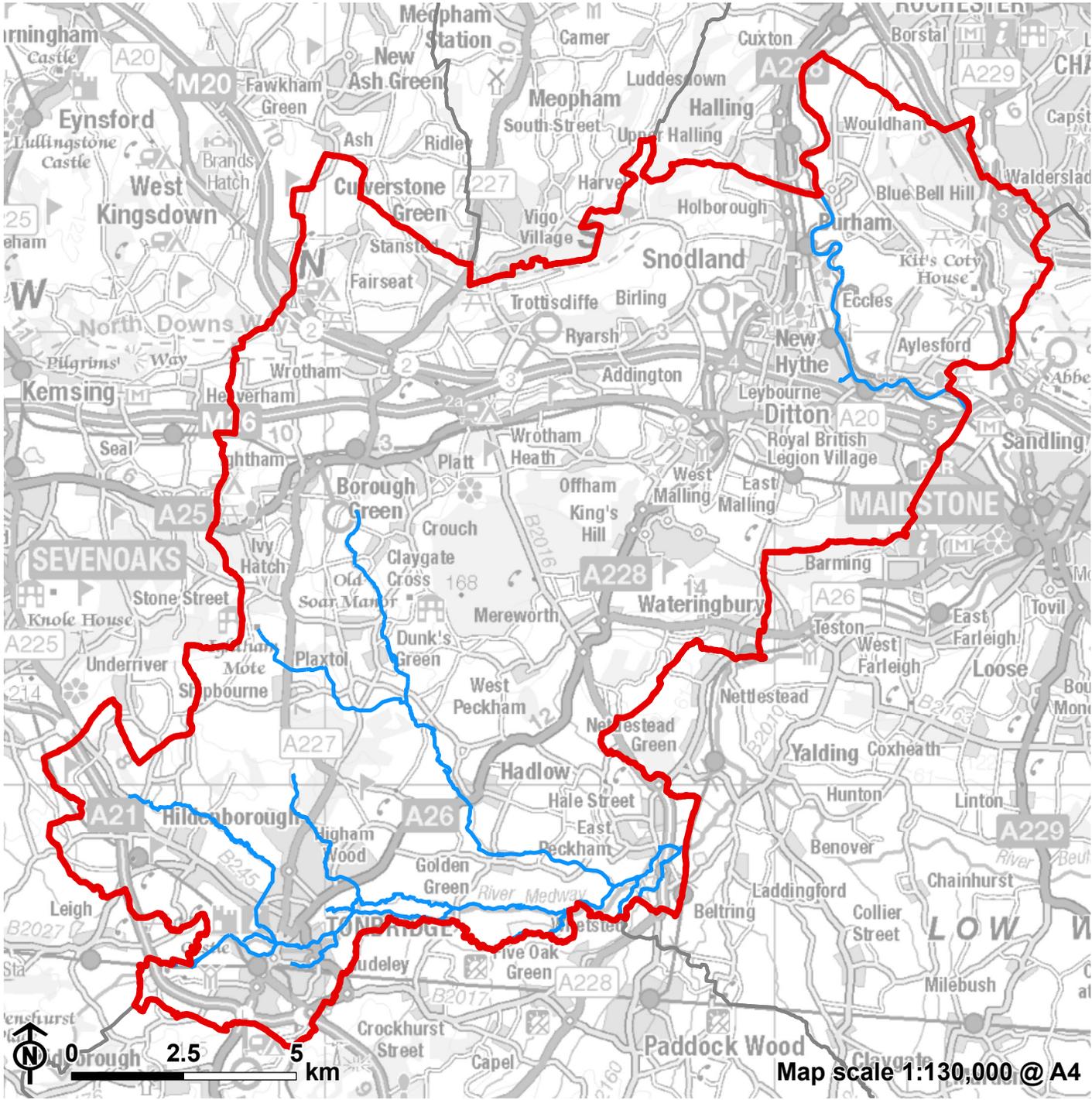
EB:Horton\_K LUC  
FIG\_C\_8\_11963\_r0\_Air\_Quality  
20/07/2022

Source: DEFRA, Tonbridge and Malling Borough Council

Map scale 1:130,000 @ A4



**Figure C.9: Main Rivers in  
Tonbridge and Malling**



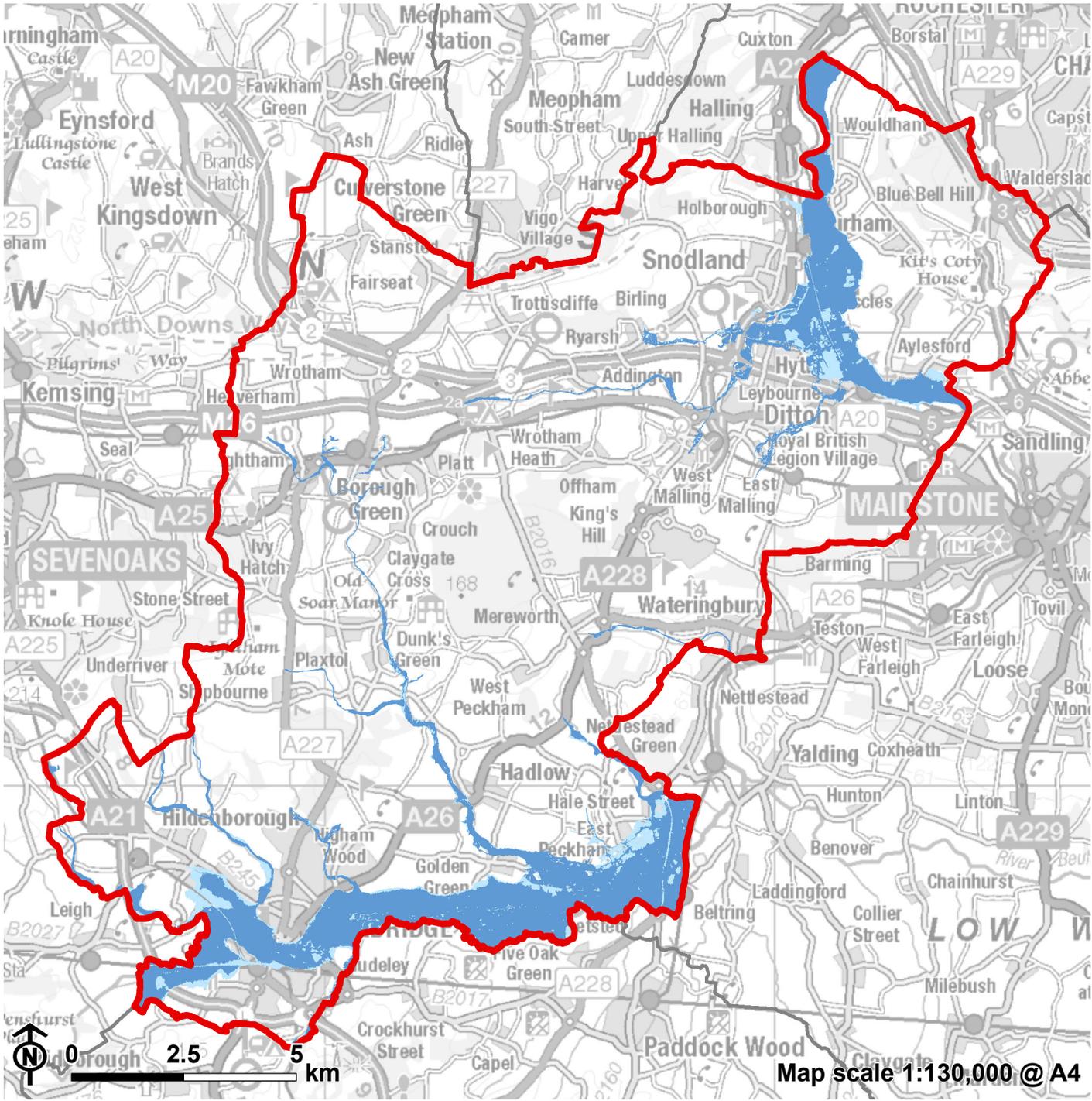
- Tonbridge and Malling Boundary
- Neighbouring local authority
- Main river

EB:Horton\_K LUC  
FIG\_C\_9\_11963\_r0\_Main\_river  
20/07/2022

Source: Ordnance Survey, Tonbridge and  
Malling Borough Council



**Figure C.10: Flood risk zones in  
Tonbridge and Malling**



-  Tonbridge and Malling Boundary
-  Neighbouring local authority
-  Flood zone 2
-  Flood zone 3

EB:Horton\_K LUC  
FIG\_C\_10\_11963\_r0\_Flood\_Risk\_Zone  
20/07/2022

Source: Environment Agency, Tonbridge  
and Malling Borough Council

# 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 have been identified by TMBC. These sites were identified via a call-for-sites exercise and an Urban Capacity Study. In addition, allocations from the withdrawn Local Plan which were not submitted during the call-for-sites exercise and were not identified in the Urban Capacity Study have been identified in the pool of reasonable alternative options. These sites have been appraised against the site assessment criteria set out in this appendix.

## Assumptions regarding distances

**D.2** 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 Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

### **D.3** Town centres

- Desirable – 200m
- Acceptable – 400m
- Preferred maximum – 800m

### **D.4** Commuting/School/Sight-seeing

- Desirable – 500m
- Acceptable – 1,000m
- Preferred maximum – 2,000

### **D.5** Elsewhere

- Desirable – 400m
- Acceptable – 800m
- Preferred maximum – 1,200m

## Assumptions regarding accessibility

**D.6** Sites have been assessed by TMBC for accessibility to local services (including: transport infrastructure, education facilities, healthcare facilities and essential services) using accessible walking distances informed, in part, by guidance such as Planning for Walking<sup>49</sup>. Sites have also been assessed on their location, with sites within settlements placing higher in the settlement hierarchy being considered more accessible. Sites have then been given an overall accessibility score, and placed in to one of the following bands outlined in **Table D.1** below.

**Table D.1: Accessibility Bandings**

Accessibility Score	Accessibility Band
0 – 20	Poor
21 – 40	Fair
41 – 60	Good
61 – 80	Very Good
81 – 100	Excellent

**D.7** The methodology devised by TMBC (as outlined above and explained in detail in the Urban Capacity Study), has been used to inform the assessment criteria outlined below that are being used in the SA of site options.

**D.8** 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.9** 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.10** 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.

**D.11** 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.
- 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.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 (+/--?) or (+/--?) effect.

<sup>49</sup> **Planning for Walking:**  
[https://www.ciht.org.uk/media/4465/planning\\_for\\_walking\\_-\\_long\\_-\\_april\\_2015.pdf](https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf)

## Employment Site Options

**D.13** 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.
- 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.14** 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).

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

### Residential and Mixed Use Site Options

**D.15** 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 is the main town within the borough and is the main focus of services and facilities but there are also further urban areas including the Medway Gap, Kings Hill, Snodland and part of Walderslade which offer a range of services and facilities. There are also rural service centres (including Borough Green, Hadlow, Hildenborough and West Malling and East Peckham) and several smaller towns and villages that provide services and facilities commensurate with their size.

**D.16** Using the work undertaken by TMBC, the accessibility bands (see **Table 1** above) that each site has been placed

within help understand the overall accessibility of a site in relation to access to services and site location. These bandings have informed the assumptions below.

- Sites that are placed within the Excellent Accessibility Band will have a significant positive (++) effect.
- Sites that are placed within the Very Good Accessibility Band will have a minor positive (+) effect.
- Sites that are placed within the Good Accessibility Band will have a negligible (0) effect.
- Sites that are placed within the Fair Accessibility Band will have a minor negative (-) effect.
- Sites that are placed within the Poor Accessibility Band will have a significant negative (--) effect.

## Employment Site Options

**D.17** 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 that are placed within the Excellent Accessibility Band will have a significant positive (++) effect.
- Sites that are placed within the Very Good Accessibility Band will have a minor positive (+) effect.
- Sites that are placed within the Good Accessibility Band will have a negligible (0) effect.
- Sites that are placed within the Fair Accessibility Band will have a minor negative (-) effect.
- Sites that are placed within the Poor Accessibility Band will have a significant negative (--) effect.

## SA Objective 3: To improve levels of educational attainment and skills and training development for all age groups and all sectors of society

### Residential and Mixed Use Site Options

**D.18** 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 secondary school and a primary school will have an uncertain significant positive (++?) effect.
- Sites that are within 800m of an existing secondary school or a primary school (but not both) will have an uncertain minor positive (+?) effect.
- Sites that more than 800m of an existing secondary school and a primary school will have an uncertain minor negative (-?) effect.

### Employment Site Options

**D.19** The location of employment sites is not considered likely to affect this objective.

## SA Objective 4: To encourage sustainable economic growth, business development, and economic inclusion across the borough

### Residential Site Options

**D.20** 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.

### Mixed Use and Employment Site Options

**D.21** All of the mixed use and employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the creation of more new jobs and so would have significant positive effects. It is assumed that all mixed use site options will incorporate some element of employment generating uses and could therefore effect the employment opportunities element of this objective. Employment generated from site options is likely to benefit the highest number of residents where sites are accessible by sustainable transport links. Therefore:

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

**D.22** 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.
- 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.23** 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 biodiversity or geodiversity sites 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 a locally designated site may have a minor negative (-?) effect.
- 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 could have a negligible (0?) effect.

**D.24** In addition, site options that contain an existing green infrastructure asset that could be lost as a result of new development may have a significant negative effect (--?), although this is currently uncertain as it may be possible to conserve or even enhance that asset through the design and layout of the new development.

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

### Residential, Mixed Use and Employment Site Options

**D.25** 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 on the edge of a settlement will have an uncertain minor negative (-?) effect.
- All sites not located near any settlements in rural locations, and/or would result in the loss of designated open spaces will have an uncertain significant negative (--?) effect.

**D.26** In addition, proximity to the Kent Downs and High Weald AONB's can provide an indication of the potential for development to have adverse impacts on those designated landscapes.

- Sites that are within 500m of the AONB could have a significant negative (--?) effect.

## SA Objective 7: To protect and enhance the cultural heritage resource

### Residential, Mixed Use and Employment Site Options

**D.27** Development sites that are within close proximity of a heritage feature have the potential to affect their setting and contribution to the local character and distinctiveness. 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 feature may have a significant negative (--?) effect.
- Sites that are located between 250m-1km of a heritage feature may have a minor negative (-?) effect.
- Sites that are more than 1km from a heritage feature may have a negligible (0?) effect.

## SA Objective 8: To protect and enhance the quality of water features and resources

### Residential, Mixed Use and Employment Site Options

**D.28** 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, 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.
- Site options that are entirely or largely ( $\geq 75\%$ ) within Flood Zone 1 will have a negligible (0) effect on the assumption that flood risk could be avoided.

**D.29** Levels of water consumption within new development will be determined by its design 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, which could result in mixed effects overall:

- Development on sites which contain a water body or water course 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.
- Development on sites which do not contain a water body or watercourse or fall within a Source Protection Zone would have a negligible (0) effect.

## SA Objective 9: To conserve and enhance soil resources and guard against land contamination

### Residential, Mixed Use and Employment Site Options

**D.30** 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.

- Greenfield sites that contain a significant proportion ( $\geq 25\%$ ) of Grade 1 and/or 2 agricultural land will have a significant negative (--) effect.
- Greenfield sites that contain a significant proportion ( $\geq 25\%$ ) of Grade 3 agricultural land could have a significant negative (--?) effect. The uncertainty acknowledges that the Grade 3 agricultural land may be either Grade 3a (high quality) or 3b (not classed as high quality).
- Greenfield sites that contain a less than significant proportion ( $< 25\%$ ) of Grade 1, 2 or 3 agricultural land will have a minor negative (-) effect.
- Sites that are located on brownfield land will have a significant positive (++) effect.

## SA Objective 10: To reduce greenhouse gas emissions so as to minimise climate change

### Residential, Mixed Use and Employment Site Options

**D.31** 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, but this cannot be assumed.

**D.32** It is assumed 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 do so will depend on factors such as the availability of cycle storage facilities at their end destination, 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.
- 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 improve adaptation to climate change so as to minimise its impact

### Residential, Mixed Use and Employment Site Options

**D.33** The location of development will not affect the achievement of this objective as effects will depend largely on the detailed proposals for sites and their design, which would be influenced by policies in the new Local Plan and details submitted at the planning application stage. The extent to which the location of development sites would facilitate the use of sustainable modes of transport is considered separately under SA objective 10. The likely effects of all site options on this objective are therefore negligible (0).

## SA Objective 12: To protect and improve air quality

### Residential, Mixed Use and Employment Site Options

**D.34** Development sites that are within, or very close to, the Air Quality Management Areas (AQMAs) 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 are likely to have a significant negative (--) effect.
- 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.35** All new development will 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.
- Sites that do not fall within a Minerals Safeguarding Area are expected to have a negligible (0) effect.

**D.36** 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

### Residential Site Options

**D.37** All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. The location of site options will not influence the mix of housing that is provided onsite – this will instead be determined by Local Plan policies. However, it is expected that sites of a larger size may be able to offer a wider mix of housing, 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.38** 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.39** 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).