



Tunbridge Wells Borough Site Allocations Local Plan

Sustainability Appraisal Final Report July 2016

Tunbridge Wells Borough Local Plan: Site Allocations DPD Submission Document

Addendum to Sustainability Appraisal – Site Allocations Development Plan Document Submission Report (February 2015) (CD 3.63)

Schedule of amendments to the Sustainability Appraisal arising from proposed modifications to the Site Allocations DPD Submission Document

POINT IN DOCUMENT	AMENDMENTS TO SUSTAINABILITY APPRAISAL – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT SUBMISSION REPORT (FEBRUARY 2015)	IN RESPONSE TO COMMENT / REASON FOR CHANGE
NON-TECHNICAL SUMMARY		
Paddock Wood Paragraph 39 Page 9	Amendment as follows: “ Paddock Wood 39 A significant beneficial cumulative impact is predicted in relation to housing need and employment. Minor beneficial cumulative impacts are predicted for social inclusion, service provision, efficient use of land and transport objectives. A minor adverse cumulative impact is anticipated for natural/built environment <u>and efficient land use</u> ...”	To reflect comments by the High Weald AONB Unit
Cranbrook Paragraph 40 Page 9	Amendment as follows: “ Cranbrook 40 A significant beneficial cumulative impact is predicted in relation to housing need. Minor beneficial cumulative impacts are expected for service provision, efficient land use, transport and employment. No adverse cumulative impacts are identified. <u>A minor adverse cumulative impact is anticipated for efficient land use</u> ...”	To reflect comments by the High Weald AONB Unit
Hawkhurst Paragraph 41 Page 9	Amendment as follows: “ Hawkhurst 41 A significant beneficial cumulative impact is expected in relation to efficient land use social inclusion . Minor beneficial cumulative impacts are predicted for housing need, <u>social inclusion</u> , service provision, natural/built environment, transport and employment. No adverse cumulative impacts are predicted. In terms of timescales, development in Hawkhurst will be delivered from a number of sites from within and adjoining the settlement. It is anticipated that sites will be delivered over the early and middle part of the plan period. Accordingly, the full cumulative impacts would be unlikely to occur until the medium term.”	To reflect comments by the High Weald AONB Unit
Villages and Rural Areas	Amendment as follows: “ Villages and Rural Areas	To reflect comments by the High Weald AONB

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Paragraph 42 Page 9	42 There are only four policies concerning allocations in the villages and rural parts of the Borough. Since two of these relate to Pembury, a cumulative analysis was carried out for this village. This indicated that the policies in Pembury to provide recreation open space and Park and Ride would have a minor adverse cumulative impact on housing need (as they do not include housing provision) but would provide minor cumulative benefits in terms of all other sustainability objectives except crime waste, energy and employment.”	Unit
SECTION 7: SUSTAINABILITY APPRAISAL OF SITES		
Table 20 Page 46	<p>Table 20: Royal Tunbridge Wells – Summary of Policies Together with Cumulative Impact</p> <p>Amendments as follows:</p> <ul style="list-style-type: none"> • Delete row for AL/RTW4 • Insert new rows for AL/RTW4A and AL/RTW4B. Populate with scores proposed • Delete row for AL/RTW24 	Modifications proposed by Council’s statements on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of Change (TWBC/PS/42) and Main issue 3: Housing Allocations (TWBC/PS/43)
Table 21 Page 51	<p>Table 21: Royal Tunbridge Wells – Commentary on Cumulative Impact of Policies</p> <p>Objective: Water/flood risk</p> <p>Amendments as follows:</p> <p>“26 impacts on flooding are likely to be significant. 2 minor adverse impacts (AL/RTW4B and AL/RTW6 are expected on sites which lie partially in flood zones.”</p>	Separate policy for each allocation site to reflect Council’s statement on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of Change (TWBC/PS/42)
Table 24 Page 63	<p>Table 24: Paddock Wood – Summary of Policies together with Cumulative Impact</p> <p>Amendment as follows:</p>	Separate policy for each allocation site to reflect Council’s statements on

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	<ul style="list-style-type: none"> Split row AL/PW3 into 3A and 3B 	<p>Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6 (TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)</p>
<p>Table 25 Pages 64-69</p>	<p>Table 25: Paddock Wood – Commentary on Cumulative Impact of DPD Policies</p> <p>Amendments as follows:</p> <p>Housing need / Comments column</p> <p>“These allocations have the potential to provide approximately 950 new homes on the residential sites (Policies AL/PW3A, AL/PW3B and AL/PW4) together with some residential accommodation on the mixed use site (Policy AL/PW1)...”</p> <p>Health / Comments column</p> <p>“... The Wesley Centre (Policy AL/PW2) and the residential allocations (Policies AL/PW3A, AL/PW3B and AL/PW4) have the potential to incorporate or contribute to new community facilities ...”</p> <p>Health / Measures to Increase Sustainability column</p> <p>“... The residential allocations (Policies AL/PW3A, AL/PW3B and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit health objectives through promoting walking, cycling and general well-being ...”</p> <p>Social Inclusion / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AP/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit social inclusion through</p>	<p>Separate policy for each allocation site to reflect Council’s statements on Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6 (TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)</p>

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	<p>promoting walking and cycling networks and access to green open space.”</p> <p>Education / Comments column</p> <p>“The primary school allocation in Policy AL/PW3B will benefit education objectives and the general policies AL/STR1-2 may enhance access to education.”</p> <p>Service Provision / Comments column</p> <p>“... Polices AL/PW2, ALPW3A, AL/PW3B, AL/PW4 have the potential to incorporate new community facilities and/or local employment opportunities ...”</p> <p>Service Provision / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AP/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which improve pedestrian and bicycle access to local facilities and provide accessible green open space.”</p> <p>Pollution / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AP/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could improve air quality and greenhouse gas emissions.”</p> <p>Water / flood risk / Comments column</p> <p>“... Church Farm and Mascalls Farm (AL/PW3A and AL/PW4) have surface water features within or adjoining the site which might be adversely affected by development ...”</p> <p>Water / flood risk / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit natural drainage and reduce flood risk.”</p> <p>Biodiversity / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit biodiversity by providing linked, linear</p>	

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	<p>habitats.”</p> <p>Natural / built environment / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit the quality of the townscape ...”</p> <p>Transport / Measures to Increase Sustainability column</p> <p>“... Policies AL/PW3A, AL/PW3B and AP/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could promote walking, cycling and access to local services.”</p> <p>Employment / Comments column</p> <p>“... Policy AL/PW1 and the proposed primary school under Policy AL/PW3B could create additional local employment ...”</p>	
SECTION 8: CONCLUSIONS		
<p>Paddock Wood Page 91</p>	<p>Paragraph 8.5</p> <p>Throughout paragraph ensure reference to AL/PW3 is described as AL/PW3A and AL/PW3B</p>	<p>Separate policy for each allocation site to reflect Council’s statements on Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6 (TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)</p>

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APPENDIX 2: SUSTAINABILITY APPRAISAL POLICY MATRICES		
Policy AL/STR4: Infrastructure – Bewl Water Reservoir Page 146	Delete all existing text on page 146	To reflect deletion of Policy AL/STR4: Infrastructure – Bewl Water Reservoir (Schedule of Main Modifications, TWBC/PS/13a_Rev1)
Policy AL/RTW2: Crescent Road/Church Road Area of Change Page 148	<p>Amendments to text as follows:</p> <p>“Policy AL/RTW2 Crescent Road/Church Road Area of Change</p> <p>Policy AL/RTW2A: Town Hall Site, the 'Civic Complex' Civic Complex/Crescent Road Area of Change</p> <p>This assessment represents the site originally assessed on page 67 of the Sustainability Appraisal (Draft for Consultation - Volume 2) and known as 'Town Hall Site'. No changes have been made to the original comments below or scores above ...</p> <p>As it is a central location with good public access, where there are several services for the use of the general public, incorporating and retaining these current services could have a positive impact upon the objectives for service provision, <u>and efficient land use and transport. However, it must also be highlighted that in losing these public services and providing them in locations outside the town centre, this could have a negative impact upon these objectives. Allowing for fewer parking spaces could also have a positive impact upon the transport objective.</u>”</p>	Modifications proposed by Council’s statement on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of Change (TWBC/PS/42)
Policy AL/RTW2B: Former Cinema Site and Surrounding	<p>Amendments to text as follows:</p> <p>“Policy AL/RTW2B: Former Cinema Site and Surrounding Area of Change</p> <p>... As the site lies within the Conservation Area and within the LBD, there is an excellent opportunity to enhance the built environment with good quality design, particularly the northern area of the site (previously known as Cinema Site) which is a very prominent position at a crossroads in the centre of town. There is also (with sound mitigation) potential positive</p>	Modifications proposed by Council’s statement on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of

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Area Page 149	<p>impact for the natural environment and biodiversity through better provision of street trees and green links through the site. <u>However, removal of policy wording relating to green infrastructure means this outcome is less certain</u> ...</p> <p>This site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity. <u>There is also potential to create open spaces and to promote better cycling and walking routes</u> ...”</p>	Change (TWBC/PS/42)																																																																								
Policy AL/RTW3: Vale Avenue Area of Change Page 150	<p>Amendments to text as follows: “Policy AL/RTW3: Vale Avenue Area of Change ... Site has good vehicle and pedestrian access, <u>and the transport objective is supported by the policy wording allowing for fewer parking spaces</u>. The site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity ...”</p>	Modifications proposed by Council’s statement on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of Change (TWBC/PS/42)																																																																								
Policy AL/RTW4: Eridge Road Area of Change Page 151	<p>Delete all existing text on page 151. Insert the following instead: “Policy AL/RTW4A: Eridge Road Area of Change</p> <table border="1" data-bbox="338 930 1756 1353"> <thead> <tr> <th colspan="2" data-bbox="338 930 887 978">SA Objective</th> <th colspan="6" data-bbox="887 930 1756 978">Appraisal</th> </tr> <tr> <th data-bbox="338 978 472 1026">Number</th> <th data-bbox="472 978 887 1026">Title</th> <th data-bbox="887 978 1028 1026">--</th> <th data-bbox="1028 978 1169 1026">-</th> <th data-bbox="1169 978 1310 1026">?</th> <th data-bbox="1310 978 1451 1026">0</th> <th data-bbox="1451 978 1592 1026">+</th> <th data-bbox="1592 978 1756 1026">++</th> </tr> </thead> <tbody> <tr> <td data-bbox="338 1026 472 1074">1</td> <td data-bbox="472 1026 887 1074">Housing need</td> <td data-bbox="887 1026 1028 1074"></td> <td data-bbox="1028 1026 1169 1074"></td> <td data-bbox="1169 1026 1310 1074"></td> <td data-bbox="1310 1026 1451 1074"></td> <td data-bbox="1451 1026 1592 1074">✓</td> <td data-bbox="1592 1026 1756 1074"></td> </tr> <tr> <td data-bbox="338 1074 472 1121">2</td> <td data-bbox="472 1074 887 1121">Health</td> <td data-bbox="887 1074 1028 1121"></td> <td data-bbox="1028 1074 1169 1121"></td> <td data-bbox="1169 1074 1310 1121"></td> <td data-bbox="1310 1074 1451 1121">✓</td> <td data-bbox="1451 1074 1592 1121"></td> <td data-bbox="1592 1074 1756 1121"></td> </tr> <tr> <td data-bbox="338 1121 472 1169">3</td> <td data-bbox="472 1121 887 1169">Social inclusion</td> <td data-bbox="887 1121 1028 1169"></td> <td data-bbox="1028 1121 1169 1169"></td> <td data-bbox="1169 1121 1310 1169"></td> <td data-bbox="1310 1121 1451 1169">✓</td> <td data-bbox="1451 1121 1592 1169"></td> <td data-bbox="1592 1121 1756 1169"></td> </tr> <tr> <td data-bbox="338 1169 472 1217">4</td> <td data-bbox="472 1169 887 1217">Education</td> <td data-bbox="887 1169 1028 1217"></td> <td data-bbox="1028 1169 1169 1217"></td> <td data-bbox="1169 1169 1310 1217"></td> <td data-bbox="1310 1169 1451 1217">✓</td> <td data-bbox="1451 1169 1592 1217"></td> <td data-bbox="1592 1169 1756 1217"></td> </tr> <tr> <td data-bbox="338 1217 472 1265">5</td> <td data-bbox="472 1217 887 1265">Crime</td> <td data-bbox="887 1217 1028 1265"></td> <td data-bbox="1028 1217 1169 1265"></td> <td data-bbox="1169 1217 1310 1265"></td> <td data-bbox="1310 1217 1451 1265"></td> <td data-bbox="1451 1217 1592 1265">✓</td> <td data-bbox="1592 1217 1756 1265"></td> </tr> <tr> <td data-bbox="338 1265 472 1313">6</td> <td data-bbox="472 1265 887 1313">Service provision</td> <td data-bbox="887 1265 1028 1313"></td> <td data-bbox="1028 1265 1169 1313"></td> <td data-bbox="1169 1265 1310 1313"></td> <td data-bbox="1310 1265 1451 1313"></td> <td data-bbox="1451 1265 1592 1313">✓</td> <td data-bbox="1592 1265 1756 1313"></td> </tr> <tr> <td data-bbox="338 1313 472 1353">7</td> <td data-bbox="472 1313 887 1353">Efficient land use</td> <td data-bbox="887 1313 1028 1353"></td> <td data-bbox="1028 1313 1169 1353"></td> <td data-bbox="1169 1313 1310 1353"></td> <td data-bbox="1310 1313 1451 1353"></td> <td data-bbox="1451 1313 1592 1353">✓</td> <td data-bbox="1592 1313 1756 1353"></td> </tr> </tbody> </table>	SA Objective		Appraisal						Number	Title	--	-	?	0	+	++	1	Housing need					✓		2	Health				✓			3	Social inclusion				✓			4	Education				✓			5	Crime					✓		6	Service provision					✓		7	Efficient land use					✓		Modifications proposed by Council’s statement on Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 2: Areas of Change (TWBC/PS/42)
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	8	Pollution		✓					
	9	Water/flood risk				✓			
	10	Biodiversity			✓				
	11	Natural/built environment			✓				
	12	Transport					✓		
	13	Waste				✓			
	14	Energy				✓			
	15	Employment			✓				
	<p>Summary recommendations:</p> <p><u>As this site lies entirely within the Conservation Area, enhanced design could have a particularly positive impact on the built environment, in addition to making a positive contribution to the objective for crime (with mitigation through good design).</u></p> <p><u>There is also (with sound mitigation), potential positive impact for the natural environmental and biodiversity objectives because this site is adjacent to the Tunbridge Wells Common, Montacute Gardens and the streetscape with trees found in the Pantiles.</u></p> <p><u>The site currently offers employment; therefore loss of the provision would constitute a negative impact upon the employment objectives. This would be dependent upon the nature of the future development and retention of employment purpose should be sought (Key Employment Area). Mixed use could also be considered.</u></p> <p><u>The transport objective is supported by the policy wording allowing for fewer parking spaces. The site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity.</u></p>								

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	<p><u>100% within the AQMA buffer zone.</u></p> <p><u>This site was previously assessed on page 151 of the Sustainability Appraisal (Submission Report – February 2015) in combination with ‘Policy AL/RTW4B: Land at Montacute Gardens’ below.</u></p> <p>Policy AL/RTW4B: Land at Montacute Gardens</p> <table border="1" data-bbox="338 612 1756 1362"> <thead> <tr> <th colspan="2" data-bbox="338 612 887 660">SA Objective</th> <th colspan="6" data-bbox="887 612 1756 660">Appraisal</th> </tr> <tr> <th data-bbox="338 660 472 708">Number</th> <th data-bbox="472 660 887 708">Title</th> <th data-bbox="887 660 1028 708">--</th> <th data-bbox="1028 660 1169 708">-</th> <th data-bbox="1169 660 1310 708">?</th> <th data-bbox="1310 660 1451 708">0</th> <th data-bbox="1451 660 1592 708">+</th> <th data-bbox="1592 660 1756 708">++</th> </tr> </thead> <tbody> <tr> <td data-bbox="338 708 472 756">1</td> <td data-bbox="472 708 887 756">Housing need</td> <td data-bbox="887 708 1028 756"></td> <td 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use			✓				8	Pollution		✓					9	Water/flood risk		✓					10	Biodiversity		✓					11	Natural/built environment		✓					12	Transport					✓		13	Waste				✓			14	Energy				✓			
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POINT IN DOCUMENT	AMENDMENTS TO SUSTAINABILITY APPRAISAL – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT SUBMISSION REPORT (FEBRUARY 2015)	IN RESPONSE TO COMMENT / REASON FOR CHANGE								
	<table border="1" data-bbox="338 400 1756 448"> <tr> <td data-bbox="338 400 472 448">15</td> <td data-bbox="472 400 887 448">Employment</td> <td data-bbox="887 400 1028 448"></td> <td data-bbox="1028 400 1169 448"></td> <td data-bbox="1169 400 1310 448">✓</td> <td data-bbox="1310 400 1451 448"></td> <td data-bbox="1451 400 1592 448"></td> <td data-bbox="1592 400 1756 448"></td> </tr> </table> <p>Summary recommendations:</p> <p><u>This site is currently car park to the north of the site alongside the road, with tree cover in the centre and residential housing to the rear.</u></p> <p><u>The site lies entirely within the Conservation Area, a small proportion of flood zone and approximately 60% AQMA buffer zone. It also has 2% coverage of Archaeological Potential and a quarter of the site is designated as Commons. There is a watercourse on and under the site and TPOs at the boundary.</u></p> <p><u>It is possible that there could be limited development on site, in line with guidance for flooding and appropriate land used outside flood zone 3b. Any development would need to consider the sensitivity of the site in terms of both the built and natural environment, with careful attention to good quality design and mitigation measures. There is potential for improving the Green Infrastructure through links with the Common.</u></p> <p><u>The transport objective is supported by the policy wording, allowing for fewer parking spaces and pedestrian access to local services and facilities in the Pantiles.</u></p> <p><u>This site was previously assessed on page 151 of the Sustainability Appraisal (Submission Report – February 2015) in combination with ‘Policy AL/RTW4B: Eridge Road’ above.”</u></p>	15	Employment			✓				
15	Employment			✓						
<p>Policy AL/RTW24: Land off Grove Hill Road, 8-16 Grove Hill</p>	<p>Delete all existing text on page 172.</p>	<p>Modification proposed by Matter D: Royal Tunbridge Wells and Southborough Allocations, Main issue 3: Housing Allocations</p>								

POINT IN DOCUMENT	AMENDMENTS TO SUSTAINABILITY APPRAISAL – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT SUBMISSION REPORT (FEBRUARY 2015)	IN RESPONSE TO COMMENT / REASON FOR CHANGE
Road Page 172		(TWBC/PS/43), Appendix 1
Policy AL/RTW31: Recreation Open Space Page 179	<p>Amendments to text as follows:</p> <p>“Policy AL/RTW31: Recreation Open Space</p> <p>This policy defines on the Proposals Map the recreation designations for sports pitches, other outdoor recreation facilities and children’s playspace ...”</p>	Modification proposed by Matter I: Villages and Rural Areas Allocations, Main issue 2: Supporting a Prosperous Rural Economy (TWBC/PS/51)
Policy AL/PW1: Land off Station Road/Commercial Road Page 204	<p>Amendments as follows:</p> <p>“Policy AL/PW1: Land off Station Road/Commercial Road</p> <p>... Transport links <u>are</u> good through to Station Road <u>and positive score reflects policy requirement for cycling and pedestrian provision</u>. There is some opportunity for improvement to green infrastructure through the development of this site and potential improvement for the natural and built environment...”</p>	To reflect Council’s statements on Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6 (TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)
Policy AL/PW3: Land at Church Farm, Church Road Policy AL/PW3:	<p>Amendments as follows:</p> <p>“Policy AL/PW3A: Land at Church Farm, Church Road, TN12 6HS”</p> <p>“Policy AL/PW3B: Land off Mascalls Court Road, Paddock Wood”</p>	Separate policy for each allocation site to reflect Council’s statements on Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6

POINT IN DOCUMENT	AMENDMENTS TO SUSTAINABILITY APPRAISAL – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT SUBMISSION REPORT (FEBRUARY 2015)	IN RESPONSE TO COMMENT / REASON FOR CHANGE
<p>Land off Mascalls Court Road, Paddock Wood</p> <p>Pages 206 - 207</p>		<p>(TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)</p>
<p>APPENDIX 4: MEASURES TO INCREASE THE SUSTAINABILITY OF THE DPD</p>		
<p>Table A4.3</p> <p>Page 251</p>	<p>Amendments throughout table to ensure reference to AL/PW3 is described as AL/PW3A and AL/PW3B</p>	<p>Separate policy for each allocation site to reflect Council's statements on Matter F: Paddock Wood Allocations, Main issue 1: Paddock Wood Housing and Core Policy 11 (TWBC/PS/47), ID/16b, Actions Dec/5 and Dec/6 (TWBC/PS/47A) and ID/16c, Actions Dec/5, Dec/6 and Dec/7 (TWBC/PS/62)</p>

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Non-technical Summary

Introduction

1 Local planning authorities are required to produce local plans for their areas in consultation with the community. The local plan for Tunbridge Wells borough currently consists of:

- the Core Strategy Development Plan Document adopted June 2010 which provides the overarching principles by which the development needs of the borough will be delivered, and
- policies from the Local Plan adopted 2006 which have been saved under the 2004 Act

2 Tunbridge Wells Borough Council (the Council) is now producing a further Development Plan Document (DPD), the Site Allocations DPD, which will form part of the Local Plan and will include site allocations and designations for a range of uses across the borough.

3 This report is the Sustainability Appraisal (SA) Report for the the Site Allocations DPD. The SA Report has been produced alongside the DPD, and both documents were published for consultation at the same time. This report incorporates amendments made following the consultation exercise.

The Purpose of the SA Report

4 The purpose of SA is to promote sustainable development by ensuring that social, environmental and economic considerations are integrated into new or revised planning documents.

5 In preparing the Site Allocations DPD the Council is required by European and National law to carry out a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA). The Government recommends that these are undertaken together and this process is referred to as the “SA”. The SA is intended to assist the Council in preparing the Site Allocations DPD by identifying the key sustainability issues facing the borough, predicting how the policies in the DPD will affect those issues and by making recommendations to improve the sustainability of the DPD. The aim is to ensure that the DPD has positive impacts on sustainability objectives and that any potential negative impacts are avoided or mitigated.

The Site Allocations DPD

6 The main purpose of the Site Allocations DPD is to allocate sufficient land for housing, employment, retail and other land uses to meet identified needs in Tunbridge Wells borough up to 2026 and beyond. It follows the strategic objectives and sustainable development objectives set out as broad principles in the Core Strategy. The Submission Draft of the DPD identifies the Council’s preferred locations for development within the main settlements of Royal Tunbridge Wells and Southborough, Paddock Wood, Cranbrook and Hawkhurst and within the Villages and Rural Areas together with identifying the impact on the Green Belt and Rural Fringe areas. Outside these settlements no sites are allocated other than bringing forward some existing Local Plan allocations. In addition, a number of areas are to be protected in settlements across the borough in order to protect their open character.

7 When adopted, this DPD will illustrate the specific location and extent of the allocated and designated land on a Proposals Map and provide guidance on how the sites should be developed.

The SA Methodology

8 The SA of the Site Allocations DPD has been undertaken by the Council’s Planning Environmental Officer with the assistance of planning officers and an external consultant. The SA has been carried out alongside the preparation of the Site Allocations DPD and has informed each stage of its preparation. In accordance with guidance, the SA has been carried out in five phases.

9 Stage A involved a review of the policy framework in which the DPD is being prepared. This review covered the international, national, regional and local policy documents which should influence the DPD and with which it needs to be in conformity. In addition during this stage, data on the environmental, economic and social characteristics of the borough (baseline data) were collected. Following this research, key sustainability issues affecting the borough were identified and a series of sustainability objectives were developed against which to test the sustainability of the DPD. The findings of Stage A were presented in the Sustainability Appraisal Scoping Report for Development Plan Documents which was prepared in 2009 and updated in January 2011.

10 Stage B involved testing the DPD objectives against the sustainability objectives to ensure compatibility and then identifying and selecting sites for allocation. The stages in developing and refining the site options are set out in Chapter 2 of the Site Allocations DPD. Initially, a pool of potential sites was identified from a wide range of sources including three 'calls for sites' made as part of early engagement consultations. Some sites were ruled out as being unsuitable for further analysis, but the remaining sites were subject to sustainability appraisal which informed the Council's short listing process. A matrix was prepared for each of the Council's preferred site options indicating how the allocation would impact on each sustainability objective. All these sites are considered to be suitable, available within the plan period and deliverable. The reasons why the alternative sites assessed are not allocated are set out in the explanatory text in the Site Allocations DPD.

11 Once the sites for allocation were selected, a cumulative sustainability appraisal was carried out. The purpose of the cumulative appraisal was to predict the combined effects of the policies and allocations in the DPD. It considered the likely cumulative impacts if all the site allocations and designations in and around each settlement were developed. A separate cumulative analysis was carried out for the main urban area of Royal Tunbridge Wells and Southborough and for each rural settlement with more than one allocation - Paddock Wood, Cranbrook, Hawkhurst and Pembury. Sites in the Green Belt and Rural Fringe were incorporated into the appraisals for the adjoining settlements.

12 Once the cumulative appraisal was completed, consideration was given as to how any adverse impacts on sustainability might be removed or reduced and beneficial impacts enhanced. These suggestions were then built into the policy wording of the Site Allocations DPD where appropriate. Indicators to monitor the effects of implementing the DPD were proposed. These indicators, which will be published as part of the Council's Authority Monitoring Report, will be used to monitor impacts on each of the sustainability objectives.

13 The third stage (Stage C) was the preparation of the SA report and the fourth stage (Stage D) is this consultation. The fifth stage (Stage E) concerns the on-going monitoring of the effects of the DPD once it is adopted.

Consultation

14 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders.

15 A period of Early Engagement public consultation on the proposed DPD took place from April to June 2009. The SA Scoping Report was consulted on with key consultees during June-July 2009. The consultees included adjoining Local Authorities, Town and Parish councils, the three statutory consultees (English Heritage, Natural England and the Environment Agency) and others. Representations were received from Southborough Town Council, Kent County Council, South East England Partnership Board and Natural England to which the Council responded.

16 A second stage of Early Engagement on the proposed DPDs was held from June to August 2010. An updated SA Scoping Report was subsequently consulted on during January and February 2011 with key consultees. Representations were received from Kent County Council and Natural England.

17 The Consultation Draft DPD and SA Report were then prepared and made available to the public and previous consultees during March-May 2013. The consultation responses were considered by the Borough Council and changes made where appropriate both to the DPD and to the accompanying SA Report.

Review of Other plans, Policies and Programmes

18 The Site Allocations DPD is influenced by many other plans, policies and programmes and by broader sustainability objectives. As part of the SA, a review was undertaken of other relevant plans, policies and programmes, in order to establish their objectives and their implications for the Site Allocations DPD and SA. The most significant development for the Site Allocations DPD has been the recent publication of the National Planning Policy Framework (NPPF) in March 2012, which replaced the existing Planning Policy Statements (PPSs) and Planning Policy Guidance documents (PPGs). The NPPF is intended to streamline national planning policy, and there is now a 'presumption in favour of sustainable development'. Planning Practice Guidance was published in 2014 with advice on implementing the NPPF. In addition, the Localism Act 2011 proposes the abolition of the regional tier of the planning system but Regional Strategies remain relevant until they are formally revoked.

The Character of Tunbridge Wells Borough

19 Baseline information provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The baseline information collated in relation to Tunbridge Wells borough was presented in the SA Scoping Report 2011 and this information is re-presented and updated in this SA Report.

Environment

20 The borough has a distinctive and diverse landscape. The High Weald AONB covers approximately 70% of the borough. In addition, 22% of the borough is designated as Green Belt. Approximately 16% of the borough is recognised as Ancient Woodland. Green open spaces and vegetation contribute to the character of the borough's urban areas and rural settlements.

21 There are no internationally designated biodiversity sites in the borough. However, there are 10 Sites of Special Scientific Interest (SSSIs) of national importance. Other designations include Local Wildlife Sites, Local Nature Reserves and Sites of Local Nature Conservation Value. Important habitats and protected or notable species are not confined to designated sites. A number of habitats and species have been identified in Biodiversity Action Plans at the national, county and local level. The Kent Wildlife Trust has identified a number of Roadside Nature Reserves (RNRs).

22 The borough has some of the highest numbers of heritage assets in the South East. There are 25 Conservation Areas in the borough and numerous listed buildings clustered in the settlements and dispersed throughout the countryside. Scheduled Ancient Monuments include Iron Age hill forts, Roman sites, medieval castles and Tudor iron furnaces. The statutorily designated sites are a small fraction of the overall heritage resource. Historic routeways are a particular feature in the borough.

23 South East England is classed as an area of Serious Water Stress and water resources are likely to come under more pressure in the future due to the impact of population growth and climate change. However, South East Water and the Environment Agency have stated that there are sufficient water resources to meet the growth demands during the Plan period. The river water quality in the borough is generally good. The planning of Tunbridge Wells borough must have regard to the current and future risk of flooding. Areas of the borough, particularly around Paddock Wood, are susceptible to flooding, the principal risk being from river and storm water flooding.

24 Air quality in the borough is generally good but there is currently one Air Quality Management Area (AQMA) extending along the A26 from Royal Tunbridge Wells town centre to Southborough where nitrogen dioxide levels are monitored and measures proposed to reduce them. The Borough Council

has made commitments to reduce carbon consumption levels and monitoring indicates that domestic energy use in the borough is decreasing. There is some potential to develop renewable energy and there is also scope to encourage energy efficiency in buildings. In terms of recycling, the borough is amongst the top 20% of councils in the country for recycling and in the top 3 in Kent.

Economy

25 The Council's draft Economic Development Strategy 2011 summarises the key characteristics of the local economy. A high number of residents are economically active and unemployment levels are extremely low. A high proportion of businesses are small with almost 90% employing less than 10 people and a high proportion of the workforce run a business from home. Significant business sectors in the borough include professional, scientific and technical, construction, retail and business admin/support services, information and communication, arts, entertainment, recreation and other services. A high proportion of residents have very high skill levels but this tends to mask those with low skill levels. The Strategy notes that the cost of housing is high relative to average local wages, making housing affordability problematic and that there is limited land available for major commercial or housing development.

26 The Strategy also summarises recent trends including a reduction in land-based businesses, an increase in small new businesses, conversion of former employment sites to housing, the increasing popularity of out of town shopping centres, increasing use of internet shopping, increased traffic congestion, changes in the tourism market, loss of rural services, increase in home-based industries and recruitment difficulties for local employers.

27 National census data indicates that over 87% of employment in the borough is in the service sector. It is estimated that the tourism industry in Tunbridge Wells contributes over £232m to the local economy. The Retail and Leisure Study Update 2014 and Employment Land Review Update 2010 provide further details of key strengths and weaknesses, trends and opportunities in the borough.

28 Royal Tunbridge Wells town centre has good accessibility by a variety of transport modes. The centre benefits from extensive bus services serving its rural hinterland and the train station provides regular services to London and other areas of the south east.

Society

29 Kent County Council forecasts indicate that the population of Tunbridge Wells borough is set to increase relatively steadily from 2011 to 2026 by 0.7%. The borough has an ageing population. In the period 2010-2026, the number of households is predicted to increase by 8.3% largely due to a fall in average household size. The majority of housing stock (around 85%) is owner occupied or private rented and most of the remaining stock is owned by Registered Providers. Average house prices in the borough continue to remain higher than the Kent average and significantly higher than the UK average. The borough has a relatively high number of homes considered to be below decent standard. The most deprived areas of the borough are within Broadwater, Sherwood and Southborough and High Brooms wards.

30 The proportion of residents with degree level education or above rose to almost 35% in 2011 which is significantly above the national average. The proportion of people with no qualifications is below the national average. Life expectancy at birth is above the national average and the 2010 Borough Survey indicated that 89% of respondents were satisfied with their local area as a place to live.

31 The rural character of the borough provides good opportunities for outdoor informal recreation. There are considerable variations between parishes in provision of formal open space, in particular in relation to provision for young people and children. The overall provision of children's play space is below the benchmark figure suggested by the Fields in Trust organisation (formerly National Playing Fields Association).

Key Sustainability Issues in Tunbridge Wells Borough

32 The Scoping Report 2011 set out how the reviews of policy context and baseline information were used to identify key sustainability issues for the borough. These in turn were used to develop a framework of sustainability objectives. Many of the issues identified are influenced by factors outside the control of the planning system but the Site Allocations DPD can influence trends. Table 1 sets out the key sustainability issues and likely trends if the DPD were not implemented.

Table 1 Key sustainability issues and anticipated trends without the Site Allocations DPD

Key sustainability issues	Likely trend without the DPD
Social	
Limited supply of land for housing	This is likely to continue without allocation of sites to meet housing need due to the environmental constraints and the lack of large strategic development sites.
Population structure - ageing population	This creates specific needs for housing and services which are unlikely to be met without allocation of sites to meet housing and community needs.
Shortage of open spaces and recreation facilities	This is unlikely to be remedied without the specific recreation open space designations in the draft DPD. There is likely to be continued pressure for housing development on green open spaces.
Crime	Other organisations including the Police and local Community Safety Partnership have responsibility to reduce crime and fear of crime. However, the DPD could contribute to this process by promoting the redevelopment of derelict and vacant sites and facilitating new development that would be designed to reduce crime and fear of crime.
Education Achievement	Kent County Council has responsibility for education provision in the borough but in the absence of the DPD and its supporting infrastructure plan, land would not be allocated for provision of educational establishments and it would be more difficult to meet local needs.
Health	The Council works in partnership with other organisations to promote health in the borough through a broad range of initiatives. However, in the absence of the DPD and its supporting infrastructure plan, there would be less control on the location of development which might result in increases in air pollution and loss of green open space which would have an adverse impact on health.
Environmental	
Landscape Quality	A less rigorous approach to the location of development could have an adverse impact on landscape quality which would be particularly harmful within the AONB.
Access to Culture	The Council works in partnership with other organisations to promote access to culture in the borough through a broad range of initiatives. However, in the absence of the DPD, opportunities would be lost to provide new community and cultural facilities and to ensure that new residential developments have good access to facilities.
Biodiversity	The DPD directs development away from the most valuable habitats. A less rigorous approach to the location of development could have an adverse impact on biodiversity sites and reduce opportunities to provide linked green infrastructure.

Key sustainability issues	Likely trend without the DPD
Water quality	A less rigorous approach to the location of development could have an adverse impact on water quality.
Flooding	Proposals in the draft DPD, particularly in relation to Paddock Wood should ensure an improvement to the flood risk in the settlement. Without the DPD, these potential benefits might not be achieved.
Air Quality	The DPD seeks an efficient use of land, which should minimise loss of greenfield sites which contribute to air quality.
Renewable Energy	Development management policies and building regulations will help to increase the proportion of domestic energy from renewable sources. However, the masterplan approach required by the DPD on larger developments will provide opportunities to reinforce this trend.
Waste/recycling	This DPD is unlikely to have a significant effect on waste/recycling trends.
Transport/congestion	The DPD seeks to locate development in sustainable locations which should minimise the need to travel and therefore help to maintain air quality. A less rigorous approach to site selection could have an adverse effect on transport/congestion.
Economic	
Pockets of deprivation in an otherwise affluent area	The DPD should increase access to community facilities and services. Location of development in sustainable locations improves access for residents without use of a car. The absence of specific allocations and designations for community facilities would contribute to a persistence of pockets of deprivation.
Loss of economic floor space	Due to changes in permitted development rights, changes in use from office to residential will take place in some circumstances without planning permission. This limits the ability of the DPD to address this issue. However, without the specific mixed use and employment allocations in the DPD, this loss of economic floor space would be likely to increase.
Facilitation of leisure and tourism	The DPD contains recreation open space designations and allocations for community facilities. In addition, it seeks to locate development close to services and facilities and promotes the enhancement of green corridors. In the absence of the DPD, there is greater risk of development on green open spaces and in less sustainable locations.

Tunbridge Wells Borough's Sustainability Objectives

33 The sustainability objectives have been used at each stage of the SA to assess the options for the Site Allocations DPD. They are shown below in Table 2.

Table 2 Tunbridge Wells Borough Sustainability Objectives

1	Provide sufficient housing to meet identified needs, including affordable housing
2	Improve health and reduce health inequalities
3	Reduce poverty and increase social inclusion
4	Improve educational attainment and enhance the skills base

5	Reduce crime and the fear of crime
6	Improve quality, range and accessibility to all services and facilities
7	Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance
8	Reduce pollution (to land, air and soil) and greenhouse gas emissions
9	Protect and enhance water resources and manage flood risk and reduce the impact of flooding
10	Conserve and enhance biodiversity and geodiversity
11	Protect and enhance the natural and built environment and provide accessibility
12	Improve travel choice and reduce the need to travel, particularly by car/lorry to reduce traffic congestion
13	Reduce the impact of resource consumption and reduce waste generation and disposal
14	Increase energy efficiency and the proportion of energy generated from renewable sources
15	Facilitate and support a diverse employment base and sustainable economic growth

The Influence of the SA on the Site Allocations DPD

34 The SA was carried out at all key stages of the site selection process from the long list of sites to the final allocations. The Council took into account the findings of the SA at each stage along with consultation responses. Recommendations arising from the SA were considered by Council Officers when preparing the Consultation Draft of the Site Allocations DPD.

Testing the DPD Objectives

35 To ensure that the Site Allocations DPD is compatible with sustainability objectives, it was necessary to test the objectives of the DPD against the objectives set out in the SA framework. A matrix was prepared testing each DPD Objective against each SA objective. This demonstrated that the objectives of the DPD are broadly sustainable. Some uncertainties were identified which reflect the inherent tension between providing for the development needs of the borough whilst protecting the borough's high quality environment.

The Sustainability Impacts of the Site Allocations DPD

36 The report considered the likely impact of individual policies in the DPD and their predicted cumulative impacts for settlements in the borough.

Royal Tunbridge Wells

37 The SA indicates that a significant beneficial cumulative impact is predicted in relation to meeting housing need, social inclusion, crime, efficient land use and transport. No cumulative adverse impacts are anticipated, although the impacts on health, education, pollution, water/flood risk, biodiversity and employment are uncertain. In terms of timescales, there is no formal phasing of development in the allocations document. However, the Council anticipates that the full cumulative impacts would not occur until the medium or longer term.

Southborough

38 Minor beneficial cumulative impacts are predicted in relation to housing need, social inclusion, service provision, crime, efficient land use, natural/built environment and employment. No adverse cumulative impacts are anticipated. In terms of timescales, Policy AL/SO2 (Southborough Hub) involves multiple land ownership and is unlikely to be developed in the short term. It is anticipated therefore, that the full cumulative impacts would not occur until the medium to long-term.

Paddock Wood

39 A significant beneficial cumulative impact is predicted in relation to housing need and employment. Minor beneficial cumulative impacts are predicted for social inclusion, service provision, efficient use of land and transport objectives. A minor adverse cumulative impact is anticipated for natural/built environment. In terms of timescales, a comprehensive masterplan is to be prepared for the residential development at Church Farm and Mascalls Court Road. Given the need for a masterplan approach and the provision of new road and flood prevention infrastructure, it is anticipated that the full cumulative impacts would not occur until the medium to long-term.

Cranbrook

40 A significant beneficial cumulative impact is predicted in relation to housing need. Minor beneficial cumulative impacts are expected for service provision, efficient use of land, transport and employment. No adverse cumulative impacts are identified. In terms of timescales, the majority of development within Cranbrook is planned to come from site allocations to the south east of the town. A comprehensive masterplan will be prepared for these sites to preserve and enhance the setting of the town and Conservation Area in line with Core Policy 12. Given the need for a masterplan approach and the provision of new road infrastructure, it is anticipated that development is likely to be towards the middle of the Plan period. Therefore it is anticipated that the full cumulative impacts would not occur until the medium or longer term.

Hawkhurst

41 A significant beneficial cumulative impact is expected in relation to social inclusion. Minor beneficial cumulative impacts are predicted for housing need, service provision, natural/built environment, transport and employment. No adverse cumulative impacts are predicted. In terms of timescales, development in Hawkhurst will be delivered from a number of sites from within and adjoining the settlement. It is anticipated that sites will be delivered over the early and middle part of the plan period. Accordingly, the full cumulative impacts would be unlikely to occur until the medium term.

Villages and Rural Areas

42 There are only four policies concerning allocations in the villages and rural parts of the borough. Since two of these relate to Pembury, a cumulative analysis was carried out for this village. This indicated that the policies in Pembury to provide recreation open space and Park and Ride would have a minor adverse cumulative impact on housing need (as they do not include housing provision) but would provide minor cumulative benefits in terms of all other sustainability objectives except crime, energy and employment.

Mitigation Measures

43 Through the SA process, a number of recommendations were made to improve the sustainability of the DPD by reducing adverse impacts and enhancing beneficial impacts. The Council has included these recommendations in the development requirements of individual allocations in the DPD where appropriate. This will ensure that any adverse impacts identified above are reduced or removed.

Monitoring

44 European legislation requires Councils to monitor the potential significant sustainability effects of their plans. The full SA Report sets out indicators for the future monitoring of the significant effects of the Site Allocations DPD. This monitoring will, where possible, be published as part of the Council's Authority Monitoring Report.

Final Steps

45 The SA Report was published for consultation alongside the Draft Consultation Site Allocations DPD. The Borough Council invited consultation responses on both documents. The DPD was then revised to take into account the consultation responses. All significant changes to the DPD have been subject to SA. The final stage is the undertaking of a further public consultation to prepare the DPD for a public examination which will be held to decide if the DPD is 'sound'.

Further Information

46 More information about SA can be found in the full SA Report and on the Planning Advisory Service website: <http://www.pas.gov.uk/chapter-6-the-role-of-sustainability-appraisal>.

Section 1: Introduction

1.1 Local planning authorities are required to produce local plans for their areas in consultation with the community. The local plan for Tunbridge Wells borough currently consists of:

- the Core Strategy Development Plan Document (DPD) adopted June 2010 which provides the overarching principles by which the development needs of the borough will be delivered. The Core Strategy sets out the key decisions about how much development will happen in the borough and where and when it will take place
- policies from the Local Plan adopted 2006 which have been saved under the 2004 Act.

1.2 These documents are supported by a range of Supplementary Planning Documents (SPD) which add further detail to the policies in the Local Plan. These SPDs are material considerations in planning decisions.

1.3 Whilst the Core Strategy provides the overarching principles, the Council is committed to producing a further Development Plan Document which will form part of the Local Plan and will include the detailed policies about the specific issue of site allocations. This Site Allocations DPD (the subject of this appraisal) will provide site allocations for a range of uses across the borough.

1.4 When adopted, this document will supersede the relevant saved policies from the 2006 Local Plan.

1.5 This is the Final Sustainability Appraisal (SA) Report for the Site Allocations DPD. The SA Report has been produced alongside the DPD, and both documents are being published for consultation at the same time largely in view of the fact that a new and significant site has been allocated in Paddock Wood. Most remaining alterations following consultation are deemed minor.

The need for Sustainability Appraisal and Strategic Environmental Assessment

1.6 The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of new or revised planning documents including DPDs. Under Section 39(2) of the Planning and Compulsory Purchase Act (2004), SA is mandatory for new or revised DPDs and other specified planning documents.

1.7 DPDs are also legally required to be subject to a Strategic Environmental Assessment (SEA) under the European Directive 2001/42/EC “on the assessment of the effects of certain plans and programmes on the environment” (the Strategic Environmental Assessment or SEA Directive) transposed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

1.8 There are many parallels between the SA and SEA process but also some differences. SA includes social and economic impacts of plans, whereas SEA is more focused on environmental impacts. The Government guidance on SA shows how it is possible to satisfy both requirements through a single appraisal process (hereon referred to as SA).

1.9 This SA has been undertaken in accordance with the guidance contained in the Communities & Local Government Plan Making Manual hosted by the Planning Advisory Service website (<http://archive.pas.gov.uk/pas/core/page.do?pagelId=109798>) and Planning Practice Guidance published in March 2014.

1.10 A key output of the SA process is a Sustainability Appraisal Report which describes what elements of the Site Allocations DPD have been appraised and how, and the likely significant sustainability effects of implementation of the Tunbridge Wells Borough Site Allocations DPD.

1.11 Table 3 below demonstrates how the requirements of the SEA Directive have been met within this SA report.

Table 3 Requirements of the SEA Directive and where they have been addressed in this SA Report

Requirements	Where covered?
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The information to be given is (Art. 5 and Annex I):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes	Section 2 of SA Report
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping Report and Sections 4 and 5 of SA Report
c) The environmental characteristics of areas likely to be significantly affected	Scoping Report and Section 4 of SA Report
d) 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 and 92/43/EEC	Scoping Report and Section 5 of SA Report
e) 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	Scoping Report and Sections 4 and 5 of SA Report
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.	Section 7 and 8 of this report and Appendices 2 and 3
g) 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	Section 7
h) 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	Section 3 of this report
i) A description of measures envisaged concerning monitoring in accordance with Art. 10.	Section 8 of this report
j) A non-technical summary of the information provided under the above headings	Front of this report.

Requirements	Where covered?
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2)	Sections 2 and 3 of this report
<p>Consultation:</p> <ul style="list-style-type: none"> • authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Art. 5.4) • 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 (Art. 6.1, 6.2) • other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7) 	Section 3 of this report
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)	Section 3 of this report
<p>Provision of information on the decision:</p> <p>When the plan or programme is adopted, the public and any countries consulted under Art.7 must be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> • the plan or programme as adopted • a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Art. 7 have been taken into account in accordance with Art. 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and • the measures decided concerning monitoring (Art. 9) 	To be completed following adoption
Monitoring of the significant environmental effects of the plans or programmes implementation (Art. 10)	Section 8 of this report. To be completed following adoption
Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This table seeks to signpost sections of the report that fulfil the SEA Directive.

Structure of the SA Report

This SA Report is set out as follows:

Section 1 – Introduction provides information on the Local Plan documents, explains the need for SA/SEA and how SEA requirements have been met.

Section 2 – The Site Allocations DPD explains the context, content and structure of the Site Allocations DPD.

Section 3 – Sustainability Appraisal Methodology and Framework sets out the methodology that has been used for the SA, describes the consultation process and explains any difficulties that have been encountered. It demonstrates how the SA has influenced development of the DPD.

Section 4 – Context Review and Baseline Information provides a description of the key environmental, social and economic characteristics of Tunbridge Wells borough and relevant national and local policy objectives that taken together provide context for the Sustainability Appraisal.

Section 5 – Key Sustainability Issues and Sustainability Objectives sets out the key sustainability issues and their likely evolution if the DPD is not adopted and explains the sustainability objectives used to appraise the sites.

Section 6 – Testing the DPD Objectives tests the DPD objectives for compatibility with the SA objectives and explains the findings.

Section 7 – Sustainability Appraisal of Sites describes the findings of the appraisal of sites for allocation including potential cumulative impacts, together with suggestions to increase sustainability. It also includes appraisal of sites which are not to be allocated at this stage.

Section 8 – Conclusions summarises the key conclusions of the SA and describes proposals for monitoring the potential sustainability effects of implementing the DPD.

Appendix 1 – Stakeholder Responses to Draft Report Consultation March - May 2013

Appendix 2 – Sustainability Appraisal Policy Matrices

Appendix 3 – Amended Matrices for Unallocated Sites by settlement

Appendix 4 – Measures to Increase the Sustainability of the DPD

Appendix 5 – The National Planning Policy Framework (NPPF) and Implications for the Draft Site Allocations DPD

Appendix 6 – Baseline Sources

Section 2: The Site Allocations DPD

The Policy Framework

2.1 The Site Allocations DPD is one of the documents identified within the Tunbridge Wells Borough Council Local Development Framework (LDF), Core Strategy adopted 2010 and the Local Development Scheme (LDS).

2.2 Its main purpose is to allocate sufficient land for housing, employment, retail and other land uses to meet the needs of the communities within Tunbridge Wells borough up to 2026 and beyond following the strategic objectives and sustainable development objectives as set out within the Core Strategy. The submission draft of the DPD identifies the Council's preferred locations for development within the main settlements of Royal Tunbridge Wells and Southborough, Paddock Wood, Cranbrook and Hawkhurst and within the Villages and Rural Areas together with identifying the impact on the Green Belt and Rural Fringe areas. Outside these settlements no sites are allocated other than bringing forward some existing Local Plan allocations. In addition, a number of areas are to be protected in settlements across the borough in order to preserve their open character.

2.3 When adopted, this DPD will illustrate the location and extent of the allocated and designated land on a Proposals Map and provide guidance on how and when the sites should be developed. The site selection process followed in the making of these preferred allocations has been guided by the methodology detailed in Chapter 2 of the DPD.

2.4 The Site Allocations DPD takes into account the relevant national, regional and local planning policy context. The plans and policies are required to be consistent with the national guidance contained in the National Planning Policy Framework (NPPF).

2.5 At the local level, the Core Strategy forms the overarching document in the LDF and all other DPDs produced by the Council should be in general conformity with this Plan. The DPD has been written in accordance with the approach of the Core Strategy to settlement growth and distribution as set out in the Core Strategy at paragraph 5.139 and with Core Policies 9-14 for individual settlements. The development that comes forward at these locations must also be consistent with other generic policies contained within Core Policies 1-8 of the Core Strategy. The draft DPD should also be consistent with the strategic objectives and sustainable development objectives of the Core Strategy set out at paragraphs 3.13-3.14 of the adopted Core Strategy.

2.6 For full details of the policy context please refer to Appendix 1 of the Sustainability Appraisal Scoping Report for Development Plan Documents updated in January 2011 and Section 4 of this report which sets out changes in the policy context since the Scoping Report was prepared.

Structure of the Site Allocations DPD

2.7 The Site Allocations DPD sets out detailed policies and site allocations and designations to meet the level of development required over the plan period. It includes the following sections:

1 Introduction: An explanation of the purpose of the DPD together with:

- a review of the national, regional and local policy context
- a review of the evidence base
- infrastructure requirements
- an explanation of how sustainability appraisal, Appropriate Assessment and Habitats Regulations have been incorporated into the plan preparation
- details of consultation undertaken and the proposed monitoring framework

2 Methodology and Strategy: an explanation of how the site allocations have been identified and the various stages involved in the production of the Site Allocations DPD together with explanation of the strategy in relation to:

- the options for built development
- the definition of Limits to Built Development
- retail, town and defined centres
- key employment areas
- environmental designations
- delivery of development

3 - 8 Proposed site allocations and policy designations: details of sites for allocation or designation and other sites considered but not allocated or designation by settlement/location together with a reasoned justification for:

- Royal Tunbridge Wells and Southborough
- Green Belt and Rural Fringe
- Paddock Wood
- Cranbrook
- Hawkhurst (Highgate), The Moor and Gill's Green
- Villages and Rural Areas

Proposals Maps

Glossary

Section 3: Methodology and Framework

Methodology and Framework

3.1 The purpose of SA is to promote sustainable development through contributing to the integration of social, environmental and economic considerations into the preparation and adoption of plans.

3.2 SA is an iterative process that takes place alongside the preparation of DPDs. This section describes the stages and tasks required in SA and how they correspond to the stages of plan preparation. It also sets out the detailed method used for this stage of the SA, to appraise the allocated sites and also the sites not allocated.

3.3 The core guidance describing the methodology for undertaking SAs and integrating the requirements of SEA into SA are the Government guidance A Practical Guide to the Strategic Assessment Directive (August 2006) and the Sustainability Appraisal section of the Communities & Local Government Plan Making Manual.

3.4 This guidance indicates that the SA should:

- perform a key role in providing a sound evidence base for the plan
- form an integrated part of the plan preparation process
- be transparent and open to public participation
- inform the decision making process to facilitate the evaluation of alternatives
- demonstrate that the plan is the most appropriate given the reasonable alternatives

3.5 The main stages of the SA process are set out below and involve the preparation of two documents:

- Scoping Report (summarising Stage A), which should be used for consultation on the scope of the SA
- SA Report (documenting Stages A-C), which should be used in the public consultation when a draft DPD is produced

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

3.6 The first stage of the SA process was presented in the Sustainability Appraisal Scoping Report for Development Plan Documents which was prepared in 2009 and updated in January 2011.

3.7 The preparation of the Scoping Report involved the following main tasks:

A1 Identifying and reviewing other relevant plans, programmes and strategies at the international, national, regional and local level

A2 Collecting baseline information on Tunbridge Wells borough

A3 Identifying key sustainability issues in Tunbridge Wells borough

A4 Developing sustainability objectives against which to assess potential impacts of the Site Allocations DPD (The SA Framework)

A5 Consulting with the three SEA Consultation Bodies (i.e. Natural England, English Heritage and the Environment Agency) and other stakeholders

3.8 In addition, the Scoping Report set out the Site Allocations DPD objectives and the methodology for undertaking the SA.

Consultation during Stage A

3.9 A period of Early Engagement public consultation on the Town Centres Area Action Plan and Allocations Development Plan Documents took place from April to June 2009. During this Early Engagement, members of the public, statutory consultees and key stakeholders were invited to submit representations on six consultation packs relating to Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook, Hawkhurst and finally the villages and rural areas. The packs provided the following information for each area – a vision and detailed objectives, development needs, town centre boundary, key issues, maps and concept diagrams, green infrastructure assets, a map of all sites and a site list.

3.10 The SA Scoping Report was consulted on with key consultees during June-July 2009. The consultees included adjoining Local Authorities, Town and Parish Councils, the three statutory consultees (English Heritage, Natural England and the Environment Agency) and others as set out in Table 4 below.

Table 4 Organisations Consulted on the Draft Sustainability Appraisal Scoping Report for Development Plan Documents June to July 2009

Natural England	Lamberhurst Parish Council
South East England Partnership Board	Paddock Wood Town Council
English Heritage	Pembury Parish Council
Environment Agency	Sandhurst Parish Council
Kent County Council	Southborough Town Council
East Sussex County Council	Speldhurst Parish Council
Government Office for the South East	Ashford Borough Council
Benenden Parish Council	Maidstone Borough Council
Bidborough Parish Council	Rother District Council
Brenchley Parish Council	Sevenoaks District Council
Capel Parish Council	Tonbridge & Malling Borough Council
Cranbrook Parish Council	Wealden District Council
Frittenden Parish Council	Royal Tunbridge Wells Town Forum
Goudhurst Parish Council	Maidstone & Tunbridge Wells NHS Trust
Hawkhurst Parish Council	West Kent Primary Care Trust
Horsmonden Parish Council	

3.11 Representations were received from Southborough Town Council, Kent County Council, South East England Partnership Board and Natural England to which the Council responded. A summary of the representations and the Council's response is set out in the Consultation Draft SA Report (March 2013).

3.12 A second stage of Early Engagement on the DPDs was held from June to August 2010 in which the text of the consultation packs was amended to take account of representation from the first stage.

3.13 An updated SA Scoping Report was subsequently consulted on during January-February 2011 with key consultees as set out in Table 5 below.

Table 5 Organisations Consulted on the Draft Sustainability Appraisal Scoping Report for Development Plan Documents January to February 2011

Ashford Borough Council	Lamberhurst Parish Council
Benenden Parish Council	Maidstone & Tunbridge Wells NHS Trust
Bidborough Parish Council	Maidstone Borough Council
Brenchley Parish Council	Natural England
Capel Parish Council	Paddock Wood Town Council
Cranbrook & Sissinghurst Parish Council	Pembury Parish Council
East Sussex County Council	Rother District Council
English Heritage	RTW Town Forum
Environment Agency	Sandhurst Parish Council
Frittenden Parish Council	Sevenoaks District Council
Goudhurst Parish Council	Southborough Town Council
Government Office for the South East	Speldhurst Parish Council
Hawkhurst Parish Council	Tonbridge & Malling Borough Council
Horsmonden Parish Council	Wealden District Council
Kent County Council Planning Policy	West Kent Primary Care Trust
Kent County Council	

3.14 Representations were received from Kent County Council and Natural England. A summary of the representations and the Council's response is set out in the Consultation Draft SA Report (March 2013).

SA Stage B: Developing and refining options and assessing effects

3.15 To ensure that the Site Allocations DPD is compatible with sustainability objectives, it is necessary to test the objectives of the DPD against the objectives set out in the SA framework.

3.16 To ensure consistency, the objectives of the DPD are the same as those in the adopted Core Strategy. There are 12 objectives in total; seven strategic objectives and five sustainable development objectives as set out in paragraphs 3.13-3.14 of the Core Strategy. The objectives all have equal importance.

3.17 The Core Strategy objectives have already been tested against the SA framework as part of the SA carried out at submission stage of the Core Strategy DPD. However, both the Core Strategy objectives and the SA framework have been modified since that time, so it is appropriate to carry out the test for compatibility again as part of this SA.

Methodology for testing the DPD objectives

3.18 To test the objectives, a matrix was prepared testing each Core Strategy Objective against each SA objective. Symbols were inserted in the matrix as follows:

/	Objectives are compatible
?	Compatibility is unclear
X	Objectives are incompatible
-	No obvious relationship between the objectives

3.19 The results of this process are set out in Section 6 of this document. A commentary on the assessment where compatibility is unclear has been provided following the assessment matrix.

3.20 Developing options for a plan is an iterative process usually involving a number of consultations with public and stakeholders. During the preparation of the Site Allocations DPD, a wide variety of potential sites were identified and assessed. The seven stages in developing and refining the site options are set out in Chapter 2 of the Site Allocations DPD and discussed below.

Methodology for developing strategic alternatives

Stages 1-3: Evidence gathering, early engagement on issues and options and selecting a pool of sites

3.21 During 2008-2009, a pool of potential sites was identified from the following sources:

- Strategic Housing Land Availability Assessment (SHLAA) and a 'call for sites' 2008
- sites which have been submitted to the Council for consideration
- sites previously allocated within the 2006 Adopted Local Plan or sites that the Council is aware of
- other studies suggesting sites and boundaries (Retail Study and Employment Land Study)
- two further 'call for sites' made as part of the early engagement consultations described above

3.22 These stages coincided with the preparation of the Scoping Report which set out how the potential sites would be appraised for sustainability.

Stage 4: Analysis of the 'pool' of sites

3.23 This pool of sites was analysed and narrowed down by discounting certain sites as follows:

- sites not in or adjacent to settlements where allocations will occur
- sites wholly within Flood Zone 3
- sites with a significant negative impact on nationally and internationally important nature conservation sites and landscape designations
- sites with a significant effect on a national heritage asset
- sites below 0.2 hectares in size (except within designated town centres)
- sites with planning permission and implemented sites

Stage 5: Further consideration of the "pool" of sites

3.24 Each site was subject to a sustainability appraisal, the results of which informed the Council's short listing process in selecting which sites to propose for allocation and which would not be proposed for allocation. The sustainability appraisals for all sites considered are attached at Appendix 2 of this report. As part of the sustainability appraisal process, consideration was given to potential impacts of development such as the landscape impact, ecological impact, site access and site feasibility.

3.25 Matrices for unallocated sites which came forward after Consultation for the Draft SA in 2013 are contained in Appendix 3.

Stage 6: Overall settlement and site analysis

3.26 The overall impact of site selection on a settlement was considered including:

- infrastructure impact
- potential other uses for sites
- results of other studies
- overall deliverability within the Plan Period
- high level viability testing on some strategically important sites

3.27 Analysis was carried out at this stage of all sites inside the Limits to Built Development and where sites were required outside the Limits to Built Development for a settlement, a further settlement analysis was carried out to determine the best locations for expansion of the settlement. The methodology for this study is set out in the Constraints Mapping Analysis. This study informed the selection of sites proposed for allocation outside the Limits to Built Development.

Stage 7: Consultation Draft Site Allocations DPD

3.28 The majority of sites allocated are for housing and mixed use development with a small number of sites allocated for employment and other uses. All these sites are considered to be suitable, available and deliverable. The reasons why alternative sites are not allocated at this stage are set out in the explanatory text in the Site Allocations DPD.

Tasks B3 and B4 – Predicting and evaluating the effects of the DPD

3.29 The predicted effects of each site allocation are set out in the individual SA matrices (Appendix 2) and summarised in section 8 of this report. To predict the effects of the DPD as a whole on sustainability objectives, a cumulative appraisal was carried out. This considers the likely cumulative effects if all the site allocations in and around each settlement are developed.

Methodology for Cumulative Sustainability Appraisal

3.30 A separate cumulative analysis was carried out for the main urban area of Royal Tunbridge Wells and Southborough and for rural settlements – Paddock Wood, Cranbrook, Hawkhurst and Pembury. Sites in the Green Belt and Rural Fringe were incorporated into the appraisals for the nearest settlements. Cumulative appraisal was not carried out for dispersed sites and in villages with only one proposed allocation.

3.31 For each settlement, a table was produced summarising the individual matrices for the sites proposed to be taken forward for allocation. The table shows how each proposed site allocation for that settlement impacts on each sustainability objective. Reading down the columns it is possible to see how many of the site allocations impact on each objective and whether that impact is beneficial or adverse, and minor or significant. At the bottom of each table a row has been inserted showing the likely cumulative effect of the individual sites against each sustainability objective. The cumulative score has been determined as follows:

- where a high number of the sites generate a beneficial impact against the sustainability appraisal, the cumulative impact is likely to be a significant beneficial effect
- where a high number of sites generate an adverse impact against the sustainability appraisal, the cumulative impact is likely to be a significant adverse effect
- where a high number of sites generate an uncertain impact against the sustainability appraisal, the cumulative impact is likely to be uncertain
- where a high number of sites generate no significant impact or where the beneficial and adverse impacts are likely to cancel each other out, the cumulative impact is likely to be no significant impact

3.32 Where the impacts are more mixed, including both beneficial and adverse impacts, a judgement is made as to whether the cumulative impact is likely to be minor beneficial, minor adverse, not significant or uncertain.

3.33 Below each table, a commentary explains the reasoning behind these judgements. In accordance with SEA Directive, the magnitude, timing, likelihood, scale and permanence of the potential significant cumulative impacts have been assessed and the findings are summarised in the commentary tables.

3.34 There is no formal phasing of allocated sites in the Site Allocations DPD and all the sites are considered to be both deliverable and developable. Therefore, it must be assumed that development could potentially come forward early in the Plan period 2010 to 2026. In reality sites will come forward

at a variable rate up to and beyond 2026 depending on economic conditions and the local land market or indeed may not be developed at all. This makes analysis of timescales difficult in terms of whether impacts are likely to be felt in the short, medium or long term. For the purposes of this appraisal, short term is taken to mean the first 5 years of the Plan period, medium term refers to the 6-10 year period and long term refers to impacts likely to be felt from 10 years to beyond the end of the Plan period. It is worth noting that unless all sites related to a particular settlement come forward quickly, the full cumulative impact is unlikely to be experienced in the short term. Therefore, unless indicated otherwise, it should be assumed that the full cumulative impact is likely to be experienced only in the medium to long term.

3.35 The results of the sustainability appraisal of individual sites and of the cumulative sustainability appraisal are set out in Section 7 of this report and Appendix 2.

Task B5 – Considering ways of mitigating adverse effects

3.36 Mitigation measures are the measures under the SEA Directive “envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme” (Article 1(g)).

3.37 Once the cumulative appraisal was completed, consideration was given as to how any adverse impacts on sustainability might be removed or reduced and beneficial impacts enhanced. These suggestions were then built into the policy wording of the site allocations DPD where appropriate except where:

- the measure is already required by the Adopted Core Strategy DPD
- the measure would generally be required as a condition attached to planning permissions
- another authority is responsible for implementation

3.38 A summary of the proposals to increase the sustainability of the DPD and the Council’s response is attached at Appendix 4.

3.39 As a result of these amendments, the Site Allocations DPD is not expected to have any significant adverse impacts on sustainability. For this reason, there are no mitigation proposals as defined under the SEA Directive. This is discussed further in Section 8 of this Report.

Task B6 – Proposing measures to monitor the significant effects of implementing the DPD

3.40 A list of indicators that will be used to monitor the effects of implementing the DPD are proposed in Section 8. These indicators, which will be published as part of the Council’s Authority Monitoring Report, will be used to monitor impacts on the sustainability objectives.

SA Stage C: Preparing the Sustainability Appraisal Report

3.41 This SA Report details the process undertaken to date in conducting the SA of the Tunbridge Wells Borough Site Allocations DPD (submission draft) as well as setting out the findings of the appraisal.

SA Stage D: Consultation on the Site Allocations DPD (consultation draft) and the Sustainability Appraisal Report (consultation draft)

3.42 The consultation drafts of the Site Allocations DPD and the Sustainability Appraisal Report were made available to the public and all previous organisations during March-May 2013.

3.43 A summary of all comments received on the Sustainability Appraisal and the Council’s response is set out in Appendix 1.

SA Stage E: Monitoring Implementation of the DPD

3.44 This SA Report sets out recommendations for monitoring the social, environmental and economic effects of implementing the Site Allocations DPD. These monitoring proposals should be considered within the context of the broader monitoring framework for the Local Development Framework and the Tunbridge Wells Borough Authority Monitoring Report.

Section 4: Context Review and Baseline Information

4.1 The Sustainability Scoping Report 2011 incorporates a review of relevant plans, policies and programmes (<http://www.tunbridgewells.gov.uk/residents/planning/planning-policy/development-plan-documents/site-allocations>). However, since the review was produced, the National Planning Policy Framework (NPPF) has been published which sets out the Government's vision for sustainable development. This policy document now replaces all the earlier Planning Policy Guidance notes (PPGs) and Planning Policy Statements (PPSs) which are discussed in the Scoping Report. A summary of the main implications of the NPPF for the Site Allocations DPD is attached at Appendix 5.

4.2 Accompanying Planning Practice Guidance was published in March 2014 and has been used to help interpret the NPPF. No changes to this Sustainability Appraisal were deemed necessary.

4.3 Other changes since the preparation of the scoping report are as follows:

Table 6 Changes in policy context since Scoping Report prepared

Earlier document:	Replaced by:
EU Directive 96/62/EC	Directive 2008/50/EC on ambient air quality and cleaner air for Europe.
	Biodiversity 2020 A Strategy for England's Wildlife and ecosystem services
Kent 2nd Local Transport Plan	Kent 3rd Local Transport Plan 2011-2016
Community Strategy Vision for Kent 2006	Community Strategy Vision for Kent 2012-2022.
Kent Minerals and Waste Development Scheme 2005	Kent Minerals and Waste Development Scheme 2012
Kent Environment Strategy Final Draft June 2010	Kent Environment Strategy 2011
Active Lives, Kent County Council Adult Social Services 2007-2016	Active Lives Kent County Council Adult Social Services 2010 to 2013
Tunbridge Wells Local Development Scheme 2008	Tunbridge Wells Local Development Scheme 2012
Tunbridge Wells Borough Housing Strategy Statement 2006-2011	Tunbridge Wells Borough Housing Strategy 2012-2017
Tunbridge Wells Borough Economic Strategy 2006-2009	Tunbridge Wells Borough Economic Strategy 2012
Tunbridge Wells Borough Landscape Character Area Assessment SPG 2002	Tunbridge Wells Borough Landscape Character Area Assessment and Capacity Study 2009 and 2011
Retail and Leisure Study 2011	Retail and Leisure Study Update 2014
	Localism Act 2011
	Tunbridge Wells Borough Agricultural Land Classification Study 2014

It is not considered that any of these policy updates represent significant changes to the principles of sustainable development used to develop the sustainability objectives in this report.

Baseline Information – the Character of Tunbridge Wells Borough

Baseline information provides the context for assessing the sustainability of sites in the Site Allocations DPD and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. The requirements for baseline data vary widely, but it must be relevant to environmental, social and economic issues, be sensitive to change and should ideally relate to records which are sufficient to identify trends.

The baseline information collated in relation to Tunbridge Wells borough was presented in the SA Scoping Report 2011. This information has been presented below and updated where more recent data are available. In some cases, the data sources have altered from those proposed in the Scoping Report. This is because Kent County Council has reduced its monitoring function and more data is now being collected by the Borough Council. The sources of data are listed at Appendix 6.

Environment

Landscape

Table 7 Tunbridge Wells Borough Landscape Features

Landscape Feature	Quantity in borough
Area of Outstanding Natural Beauty (AONB)	70%
Historic Parks and Gardens (English Heritage and Kent Compendium)	44
Ancient Woodlands	5,391 ha or 16.3% of the borough

4.4 The borough has a distinctive and diverse landscape formed by a patchwork of agriculture, woodland, heathland and rural settlements superimposed on a landform of rolling plateaux, incised by thin ghyll valleys and wide river valley floodplains.

4.5 The High Weald AONB covers approximately 70% of the borough and is considered to be one of the best surviving coherent medieval landscapes in Northern Europe. The Kent High Weald was not included within the enclosure acts and is a landscape of small, irregular fields, woods and hedges. It washes over towns such as Cranbrook and Hawkhurst as well as surrounding the town of Royal Tunbridge Wells. The following key components contribute to the character of the AONB:

- geology
- landform
- water systems and climate
- settlements
- routeways
- woodland
- field and heath

4.6 The character of the AONB is further explained in the adopted Core Strategy, The High Weald AONB Management Plan 2009 and Kent Historic Landscape Characterisation. In addition, 22% of the borough is designated as Green Belt, which helps to protect the open, rural character of the landscape. Approximately 16% of the borough is recognised as Ancient Woodland which has unique ecological and historical features.

4.7 The Tunbridge Wells Borough Landscape Character Area Assessment and Capacity Study March 2009, builds on an earlier assessment undertaken in 2002. The landscape types in the borough are mapped and described in detail and include: fruit belt; wooded farmland; low weald farmland; forested plateau; river valleys; and open farmland. These studies identified 19 character areas based on their natural characteristics and historical influences.

4.8 Green open spaces and vegetation contribute to the character of the borough's urban areas and rural settlements. Important areas of landscape within settlements have been identified and are protected through saved Local Plan policies. These include Important Landscape Approaches, Areas of Landscape Importance, Arcadian Areas and Areas of Important Open Space.

4.9 The landscape features also have historical and biodiversity value.

Nature

Table 8 Tunbridge Wells Borough Nature Designations

Name of Designation	Number in borough
International Sites (SPA, SAC, Ramsar)	0
Sites of Special Scientific Importance (SSSI)	10
National Nature Reserve (NNR)	0
Regionally Important Geological Site (RIGS)	1
Local Nature Reserve (LNR) and Community Woodland	5
Local Wildlife Site (LWS)	59
Sites of Local Nature Conservation Value (SLNCV)	17
Roadside Nature Reserves	12

4.10 There are no internationally designated biodiversity sites in the borough. The closest European Sites lie outside the borough boundary at Dungeness SAC, Dungeness to Pett Level SPA, Hastings Cliffs SAC and Ashdown Forest SPA. As part of the development of the draft DPD the Council is undertaking an update of the Habitat Regulations Assessment (HRA) and is currently working with Natural England, Wealden, Lewes and Mid Sussex District Councils and Ashdown Forest Conservators to address issues raised by earlier HRA work. A 7 km zone around Ashdown Forest has been agreed with Natural England within which development will have to contribute to mitigation measures for Ashdown Forest which includes Ashurst, Stone Cross and parts of Groombridge.

4.11 Within the borough, there are 10 Sites of Special Scientific Interest (SSSIs) which are recognised as being of national importance. A number of these are designated for geological interest relating to pits and sandstone outcrops. Others represent ghyll and sandstone woodland and parkland. The majority of these sites are in favourable or unfavourable but recovering condition except Southborough Pit and Sissinghurst Park Wood which are currently in unfavourable constant and unfavourable declining condition.

4.12 Local Wildlife Sites are designated to support biodiversity and local distinctiveness. They are of county-wide importance for their wildlife interest and consist of both private and public land. Locally designated sites include Local Nature Reserves and Sites of Local Nature Conservation Value.

4.13 Important habitats and protected or notable species are not confined to designated sites. A number of habitats and species have been identified in Biodiversity Action Plans at the national, county and local level. The Local Biodiversity Action Plan identifies six priority habitats which are lowland meadows, lowland dry acid grassland, lowland heath, built up areas and gardens, hedgerows, lowland woodland pasture and Historic Parkland, rocky outcrops and ghyll woodlands.

4.14 The Kent Wildlife Trust has identified a number of Roadside Nature Reserves (RNRs). These ribbon habitats provide havens for wildlife and act as wildlife corridors or stepping stones between larger sites.

Historical environment

Table 9 Tunbridge Wells Borough Historical Features

Name of Feature	Number in borough
Conservation Areas	25
Listed Buildings	2,985
Scheduled Ancient Monuments	11

4.15 The borough has some of the highest numbers of heritage assets in the South East. There are 25 Conservation Areas in the borough generally covering the historic centres of the main urban area and rural settlements. Many of these settlements have Roman or Saxon origins. In addition, there are numerous listed buildings clustered in the settlements and dispersed throughout the countryside. Scheduled Ancient Monuments in the borough include Iron Age hill forts, Roman sites, medieval castles and Tudor iron furnaces.

4.16 The statutorily designated sites are a small fraction of the overall heritage resource. The Council has expressed an undertaking to conserve and enhance other heritage assets, such as archaeological remains, sites of archaeological interest and sites featured on the Kent Historic Environment Record.

4.17 Historic routeways are a particular feature in the borough including elements of Roman Roads, Saxon drove roads and iron ways linked with the Wealden iron industry.

Water resources

4.18 South East England is classed as an area of Serious Water Stress and water resources are likely to come under more pressure in the future due to the impact of population growth and climate change. It is anticipated that climate change will change the frequency, duration and magnitude of drought events.

4.19 The water supplied by South East Water comes from aquifers via bore holes and wells (73%), surface water in rivers and reservoirs (19%) and through transfers from other companies (8%). As a result water supply is very dependent on the weather. Due to recent wet weather, the latest water resources reports indicate that reservoirs are almost at maximum capacity and underground sources are at average or above average levels. However, this follows a period of water shortage.

4.20 Bewl Reservoir is located partly in the borough and is managed by South East Water (25%) and Southern Water (75%). It is the largest stretch of open water in the South East and in addition to providing water it has an important recreation function.

4.21 The water companies are required to prepare Water Management Plans. South East Water and Southern Water have prepared plans covering the period 2010-2035 indicating how they propose to manage and meet predicted future water demands. Their strategies include improving water efficiency through reducing leakage and encouraging customers to avoid wastage. In addition, in the longer term, the raising of Bewl Water will be considered to increase capacity.

4.22 Nevertheless, water resources are not considered to be the major constraint on development within this area. South East Water and the Environment Agency have stated that there are sufficient water resources to meet the growth demands during the Plan Period. To reduce pressure on those resources though, it is important that new development is water efficient and protects water quality.

4.23 In terms of water quality, Environment Agency data indicates that river water quality in the borough is moderate or good and the chemical quality is good.

Flood Risk

4.24 The planning of Tunbridge Wells borough must have regard to the current and future risk of flooding. The 2007 Strategic Flood Risk Assessment (SFRA) stated that at that time 1374 properties were located in the borough in Flood Zone 2 and 1283 properties within Flood Zone 3. It is therefore important that flood risk informs land allocations. The principal flood risk is from rivers in the catchments of the River Medway, River Teise, River Beult and River Rother. However, other sources of flooding also have to be assessed which include storm water and groundwater flooding.

4.25 Climate change is predicted to result in more short duration high intensity rainfall and more frequent periods of long duration rainfall which is expected to increase the risk of flooding in future. The SFRA identifies areas in the borough at current or predicted future flood risk. In 2009 a more detailed Level 2 SFRA was undertaken for Paddock Wood which is at particularly high risk. The SFRA also indicates where and how sustainable drainage systems (SuDS) and flood defences should be considered in new development proposals. The 2009 study indicated that new development at Paddock Wood offers the opportunity to reduce the causes and impacts of flooding in the wider settlement.

4.26 In response to surface water flooding in Paddock Wood, the Council commissioned a Surface Water Management Plan (SWMP) in 2011 to gain a better understanding of flood risk and to outline a surface water management strategy. The results showed that a combination of policies, local action and larger-scale measures will be required to manage and reduce flood risk in Paddock Wood. The document proposed a long-term action plan to manage surface water.

Air Quality

4.27 The Council has the power to designate Air Quality Management Areas in parts of the borough where air quality monitoring indicates cause for concern. There is currently 1 Air Quality Management Area extending along the A26 from Royal Tunbridge Wells town centre to Southborough. The annual mean levels of nitrogen dioxide rose steadily between 2007 and 2010 but monitoring in 2011 showed a reduction. It is too early to predict whether this was due to the Council's air quality management measures or due to the particular weather conditions of that year. Early results for 2012 show an increase over the previous year.

Energy and waste

4.28 The Borough Council is legally bound by the targets and provisions of the Climate Change Act 2008 including its greenhouse gas and carbon dioxide reduction targets, the carbon budgeting scheme and the Carbon Reduction Commitment. In addition, the borough has signed up to several national indicators that aim to reduce the borough's carbon consumption levels.

4.29 Domestic energy use per consumer in the borough decreased from 2005-2010 by 16.7% for gas use and 6.6% for electricity use. There was also a downward trend in both overall CO₂ emissions and per capita CO₂ emissions in the borough between 2005 and 2010. Per capita emissions from industry, transport and domestic sources fell from 6.9 to 6.1 tonnes of CO₂.

4.30 In 2009, the Council commissioned consultants to undertake an assessment of the capacity of the borough to accommodate renewable energy solutions. This indicated that there is theoretical potential to develop renewable energy from Combined Heat and Power and District Heating, biomass and waste to energy, photovoltaics, solar thermal and heat pumps. Wind power is limited as the borough is one of the least windy parts of the UK. There is also scope to encourage energy efficiency in buildings.

4.31 The Council's Authority Monitoring Report indicates that in 2010/2011, 8 of the 11 permitted major applications that would require renewable energy met the requirement for a minimum of 10% renewable energy provision and in many cases exceeded it. Of the remaining applications, two stated energy savings or the amount of energy provided by renewable energy sources, but do not state the percentage reduction.

4.32 In terms of recycling, the borough is amongst the top 20% of councils in the country for recycling and in the top three in Kent. In the year April 2011 to March 2012, 43% of household waste was recycled and composted. This exceeds the 33% target for household waste recycling by 2015 published in the National Waste Strategy 2000.

Tunbridge Wells Borough Agricultural Land Classification Study 2014

4.33 This study has been undertaken by Vaughan Redfern and describes how the borough comprises two distinct land form areas: the High Weald and Low Weald. The geology of these areas had resulted in a ridged landscape in the High Weald typically characterised by small, irregularly shaped fields, often with small hedgerow of woodland boundaries; and a relatively flat landscape in the Low Weald characterised by woodland, grassland and poor drainage restricting agriculture.

4.34 Soils in the Low Weald are clayey and loamy, or silty over clayey. Whereas, soils in the High Weald are silty and frequently compacted and nutrient poor. Furthermore, climate in the High Weald is wetter and slightly cooler than the Low Weald.

4.35 A key finding of the study relates to agricultural land classification. Of the 109 hectares that have been surveyed within the borough since 1988, approximately 60% of this surveyed area comprises land of best and most versatile quality.

4.36 In total, agricultural land occupies approximately 90% of land in the borough and thus is an important element of the local economy. However, a 5.3% decline in farmed area occurred between 2007-2010. Whilst projected grain prices will cause fluctuations from year to year, the total area of agricultural land reduced by 5.3% between 1990 and 2008 and is considered to be the biggest pressure on agricultural land. The sites allocated for development in the DPD will add to this trend thus, where applicable, consideration is given to the quality of the agricultural land of each site when carrying out the sustainability appraisal.

Economy

4.37 The Council's draft Economic Development Strategy 2011 summarises the key characteristics of the local economy. 108,000 residents live in the borough of which more than 80% are economically active. Unemployment levels are extremely low (1.7% June 2011) and about 5,165 businesses employ approximately 48,300 people. A high proportion of businesses are small with almost 90% employing less than 10 people (UK business survey Feb 2011) and the borough has a high proportion of both the urban and rural workforce running a business from home compared to other districts in Kent. Significant business sectors in the borough include professional, scientific and technical, construction, retail and business admin/support services, information and communication, arts, entertainment, recreation and other services. Approximately 40,000 people commute in and out of the borough for work purposes (Tunbridge Wells Borough Core Strategy 2010) and one in four jobs is occupied by people living outside the borough. A high proportion of residents have very high skill levels but this tends to mask those with

low skill levels (38% with no or low qualifications). The Strategy notes that the cost of housing is high relative to average local wages, making housing affordability problematic and that there is limited land available for major commercial or housing development.

4.38 The draft Economic Development Strategy also summarises recent trends as follows:

- a reduction in the number of businesses operating in the land-based sector owing to the overall long-term decline in profitability
- an increase in the number of small new businesses being established locally, particularly in the business services sector
- the conversion of former employment sites and premises to housing, in both rural and urban areas.
- the increasing popularity of out-of-town shopping centres e.g. Bluewater and North Farm, causing Tunbridge Wells town centre to suffer from fewer long stay/high value shopping trips
- the increasing use of the internet for shopping
- increasing traffic congestion (and longer journey times), particularly in and around Tunbridge Wells town centre and the associated declaration of an air quality management area (AQMA) due to poor air quality.
- changes in the tourism market, particularly with the availability of cheap flights for weekend breaks as well as for longer holidays, but also an increase in domestic short breaks
- the loss of rural services and employment through the closure of post offices, banks, pubs, etc in rural villages.
- an increase in the number of home-based businesses
- recruitment difficulties for some local employers

4.39 Since the strategy was prepared, the number of economically active people in the borough has fallen to 73% according to the 2011 Census results. The Annual Survey of Hours and Earnings 2011 indicates that the average (mean) weekly income for full time workers in Tunbridge Wells borough is £609.80 which is above the UK average of £503.10. The average weekly income for all workers is £497.10 in the borough and £406.40 in the UK as a whole.

Table 10 Employment in Tunbridge Wells Borough by Sector

Sector	% of borough
Manufacturing	6.8
Construction	3.7
Services	87.2
Distribution, hotels & restaurants	27.3
Transport & communications	3.4
Finance, IT, other business activities	24.2
Public admin, education & health	26.6
Other services	5.7
Tourism-related	7.2

4.40 NOMIS indicated that in 2008 87.2% of employment in the borough was in the service sector which is higher proportion than in the rest of the South East and in Great Britain. It is estimated that the tourism industry in Tunbridge Wells contributed over £232 m to the local economy, up 16% compared to 2006.

4.41 Two further studies have examined the local economy.

Retail and Leisure Study Update 2014

4.42 The 2014 update of the Retail and Leisure Study concluded that Royal Tunbridge Wells is functioning well in its role as main town centre in the borough. It has an interesting mix of independent and national multiple retailers, and a good high-end retail offer. The recent reopening of a Morrisons store in the town centre has enhanced the retail offer in the centre further. The town is also an important administrative centre, and has a strong commercial leisure offer - although the absence of any cinema provision in the town centre remains a significant qualitative gap. It is recommended that retail provision continues to be improved via delivery of modern, large retail units and the leisure and cultural offer is further enhanced with family dining restaurants, cinema screens and fitness facilities.

4.43 Southborough performs an important role providing for the convenience shopping needs of the local catchment. It has a low vacancy rate, and can be expected to meet some day-to-day shopping needs. However, its range of goods and services is more limited than other centres in the borough. In particular, there is no medium- or large-sized foodstore serving the centre.

4.44 Paddock Wood has a generally good range of retailing and services facilities, anchored by a good-sized Waitrose store, a small department store, and a mixture of national and independent retailers. There are no vacant units in the centre and overall the vitality and viability of the centre is considered to be good.

4.45 Cranbrook is an attractive market town which has a specialist retail offer. It can be considered to cater for a mixture of local shopping needs and some visitors from further afield. The centre generally appears to be performing strongly in the context of its size and position within the borough's retail hierarchy.

4.46 Hawkhurst is a small centre with only a limited retail offer, including a supermarket and a small number of comparison and services used. There is a second supermarket outside the town centre which adds to consumer choice. The presence of the Kino Digital cinema within the centre is an important asset and one which ensures the centre has the potential to draw trade from a much wider catchment area than would normally be expected for a centre of its size.

4.47 Recommendations for Cranbrook, Hawkhurst, Paddock Wood and Southborough include support for retail that enhances, modernises and diversifies existing stock, providing it at an appropriate scale and improves the visual appearance of the centres.

Employment Land Review Update 2010

4.48 This study by consultants GVA Grimley indicates that the Tunbridge Wells economy demonstrates mixed performance when compared to Kent, South East and Great Britain's averages, performing strongly in some areas and underperforming in others. Generally the workforce within Tunbridge Wells is engaged in knowledge intensive industries, with particular business strengths and activity in creative and media, professional services and financial services. The study identifies key strengths, weaknesses, opportunities and threats as follows:

Table 11 Employment Land Review Findings

Strengths
<ul style="list-style-type: none"> • strong public transport connectivity to central London • certainty created by adopted LDF Core Strategy concerning the future aspirations for the borough • strong market presence in distribution sector – with recognised food distribution specialism • presence of high profile financial services and creative industry companies – most notably the BBC and AXA • high levels of employment in knowledge intensive industries • high proportion of skilled labour force engaged in high level occupations

<ul style="list-style-type: none"> • Tunbridge Wells Borough Council Employment Land Review Update October 2010 • range and choice of employment locations – from town centre through to rural • good quality and well serviced industrial/warehouse stock • strong retail offer as attractor for visitors and wider amenity for employers • high quality environment across the borough – including Areas of Outstanding Natural Beauty • attractive place to live
Weaknesses
<ul style="list-style-type: none"> • ageing and outdated office stock in town centre • weak property values discourage private development and investment • restricted connections between centres/locations within the borough • business growth driven by low value added sectors • fluctuating/cyclical levels of business formation suggests entrepreneurialism driven by external factors • propensity for 'back office' functions to locate in borough • lower workplace earnings than resident base • no immediate access to strategic road network • limited recent development of B class employment space • localised congestion at peak times
Opportunities
<ul style="list-style-type: none"> • interest in town centre development and investment from private sector • proportion of workers with high skills who commute out could be 'captured' to drive local business creation • strong forecast productivity growth can act as catalyst for improving local wages etc • strong professional services sector presence can provide strong support network for SMEs and start ups • Tunbridge Wells Borough Council Employment Land Review Update October 2010 • potential for mixed use development in the town centre to accommodate high quality small office units • town centre regeneration can re-balance the office offer of the town centre to attract new occupiers • positive approach to rural building re-use can increase employment activity and provide greater work/lifestyle choices • readily available supply of development land and property in established business clusters • visibility and perception of Tunbridge Wells as an attractive place to live can attract new employers and employees • potential to grow tourism and the visitor economy given access to Kent countryside, South Downs etc
Threats
<ul style="list-style-type: none"> • ongoing loss of employment land to non-B class uses • increasingly restricted/congested road access to Key Employment Areas • dominance of Kings Hill as an out of centre office location • growth aspirations and government support in other neighbouring districts such as Ashford and Maidstone coupled with greater land availability • revocation of the RSS removes focus on Tunbridge Wells – Tonbridge as a regional Hub • introduction of High Speed 1 to Kent makes competitor towns more accessible to/from London • continuation of trend of losing high skilled labour and importing low skilled each day as a result of access to London and ongoing low value added activity

- reliance on small number of large employers to underpin office market
- government agenda regarding public sector cost and efficiency given high reliance on public sector (principally health services) for employment locally

Transport and access

4.49 Royal Tunbridge Wells town centre has good accessibility by a variety of transport modes. The centre benefits from extensive bus services serving its rural hinterland and the train station provides regular services to London and other areas of the south east. There are also around 4,804 public car parking spaces. Given its location, transport connections to London and the South East and the skills and qualifications profile of the residents it is unsurprising that the borough experiences significant population movements each day. In and out commuting is balanced with a total of 19,414 workers commuting into the borough and 19,742 commuting to other areas (Census 2001) each day. Approximately 40% of the resident workforce leaves the borough each day, with the largest single proportion commuting to Greater London (12%). There is also a significant proportion of leakage to other parts of Kent, most notably Maidstone, Tonbridge and Malling and Sevenoaks. With regard to inward commuting, a large proportion of movements (13%) come into the borough from areas to the south, principally Wealden, Rother and Hastings. There is also a significant draw of labour from the rest of Kent, similar to out-commuting this is primarily drawn from the neighbouring boroughs of Tonbridge and Malling, Maidstone and Sevenoaks but also includes a significant element from Ashford.

4.50 In terms of vehicle movements, the latest data paints a mixed picture. The Kent Travel Report 2011 indicates that vehicle numbers within Royal Tunbridge Wells increased slightly from 101,250 in 2009 to 101,303 in 2010 whilst heavy goods vehicles decreased from 5,311 in 2008 to 3,713 in 2010. The number of vehicles crossing the outer cordons increased from 129,190 in 2009 to 137,784 in 2010.

Society

Population

4.51 The Kent County Council strategy-based forecasts (November 2012) indicate that the population of Tunbridge Wells borough is set to increase relatively steadily from 115,200 in 2011 to 116,000 by 2026; an increase of 0.7%. The borough has an ageing population. The overall size of the working age population (16-64) is predicted to fall between 2011 and 2026, by 8.0%. The child population (0-15) is predicted to increase by just 0.6%. However, the most significant change, and the one which is likely to have the greatest effect on planning policy is the predicted 33.2% increase in the proportion of older population (65 and over) over the same period. The 2011 Census indicates that 94.9% of the population in the borough is white. Other ethnic groups are represented as follows: Mixed origin 1.6%; Asian 1.2%; Black 0.6%; Chinese 0.5%; and other ethnic groups 0.3%. Ethnic diversity has increased since the 2001 census (97.6% white). According to the 2011 Census, 62.9% of the population are Christian, 26.6% follow no religion, 8% did not state a religion, 1.1% are Muslim and 1.4% follow other religions.

Housing

4.52 Data on housing is given in the Council's Authority Monitoring Report and the 2011 Census. In the period 2011-2026, the number of households is predicted to increase from 48,200 to 52,200; an increase of 8.3%. This is almost twelve times the rate of growth of the population and reflects the fact that the average household size is forecast to fall from 2.33 in 2011 to 2.16 in 2026. Household types show a predicted increase in smaller household types including one person households, couples without children and single parents. In response to this trend, during this monitoring year, approximately 65% of dwellings completed were small or intermediate.

4.53 Approximately 85% of the dwelling stock within the borough is owner occupied or private rented, which is higher than the average for England but less than that for the South East. The majority of the remaining stock is owned by Registered Social Landlords. Only 0.04% of the dwelling stock in Tunbridge Wells borough is owned by the Local Authority compared to 4.9% and 7.6% in the South East and England respectively.

4.54 Average house prices in the borough continue to remain higher than the Kent average and significantly higher than the UK average. While the average house prices in Tunbridge Wells displayed a steadily rising trend until September 2008, prices have fluctuated since, falling after September 2010 to give an average house price of £306,510 in the quarter to March 2012. Average house price trends in England and Kent have followed a similar pattern, although the changes in average price have not been so pronounced. During the monitoring year, 85 affordable dwellings were completed exceeding the target of 70 units per year. However, the only other years the target has been met were 2006/07 and 2010/11 resulting in only 71% of the cumulative target for 2006/07 to 2011/12 being delivered.

4.55 Housing densities on completed developments are monitored by the Council to indicate efficiency of land use. Between 2004/05 and 2009/10, the percentage of completed dwellings at less than 30 per hectare remained relatively constant and low, at a mean of 31% each year. While the remaining categories have fluctuated, from 2006/07 it appears that the percentage of dwellings at over 50 per hectare is increasing. In 2011, the proportion of dwellings built at over 50 per ha had increased to 64.20% and the proportion at less than 30 per hectare decreased slightly to 29.88%.

4.56 The Council monitors Building for Life Assessment results on larger development schemes. This is a government-endorsed benchmark developed by CABI which assesses developments against 20 criteria related to environment and community, character, streets, parking and pedestrianisation, design and construction. The only two major residential schemes which were completed in 2011 were assessed as being average.

4.57 The borough has a relatively high number of homes considered to be below decent standard. In the owner occupied sector 13,008 (33.6%) of homes are non decent mainly due to excess cold, with 2,473 (19%) occupied by vulnerable households. This compares with the private rented sector where 3,909 (43.6%) of homes are non-decent.

Deprivation

4.58 The number of people claiming income support decreased from 2,180 in 2009 to 1,660 in February 2012. The Index of Multiple Deprivation (IMD) provides a method for determining areas of relative deprivation taking into account education, employment, crime, health, housing, income and living environment. In Tunbridge Wells borough, no areas fall within the most deprived 20% in the country, but three clusters of areas fall within the most deprived 20-40% category. These form part of Broadwater, Sherwood and Southborough & High Brooms wards. At the other end of the scale, a number of areas in the borough fall within the 80-100% (least deprived) category nationally.

Education

4.59 The proportion of residents with degree level education or above has risen from 24.3% in 2001 to 35.3% in 2011 which is significantly above the national average of 32.9%. The proportion of people with no qualifications is 7.1% which is below the national average of 10.6%.

Lifestyle

4.60 Life expectancy at birth is 80.7 years for men and 83.6 for women in the borough which is above the national average of 78.2 and 82.3 respectively. The 2010 Borough Survey indicated that 89% of respondents were satisfied with their local area as a place to live.

4.61 The rural character of the borough provides good opportunities for outdoor informal recreation. In terms of more formal provision, the Tunbridge Wells Borough PPG17 Sport, Recreation and Open Space Study 2007 provides information on other open space provision as set out in Table 12 below. There are considerable variations between parishes in provision of open space, in particular in relation to provision for young people and children. The overall provision of children's play space is below the benchmark figure suggested by the Fields in Trust organisation (formerly NPFA).

Table 12 Recreation Open Space provision in the Borough

Type of Recreation Open Space	Size (ha per 1000 residents)
Recreation open space (playing fields)	2.53
Children's play space	0.43
Local parks and recreation grounds	0.83
Parks and formal gardens	10.81

Crime

4.62 The total number of recorded crimes in the borough fell by 9% from 5,496 in 2010/11 to 4,999 in 2011/12. There were only two categories that saw increases in crime over this period. These were theft from the person and common assault.

Section 5: Key Sustainability Issues and Sustainability Objectives

Introduction

5.1 The Scoping Report 2011 sets out how the review of policy context and baseline information in Section 4 of this report helped to identify key sustainability issues for the borough. These in turn were used to develop a framework of sustainability objectives against which to test the sustainability of the Submission Draft Site Allocations DPD.

Key Sustainability Issues and likely evolution without the Site Allocations DPD

5.2 The SEA Directive requires that this report considers "*the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.*"

5.3 Table 13 sets out the key sustainability issues in Tunbridge Wells borough. These are relevant to producing the Site Allocations DPD and have been considered throughout the SA process. The table also sets out how these issues are likely to develop over time if the Site Allocations DPD is not produced. This indicates that the submission draft DPD is expected to have positive benefits in addressing local sustainability issues.

Table 13 Key sustainability issues and anticipated trends without the Site Allocations DPD

Key sustainability issues	Likely trend without the DPD
Social	
Limited supply of land for housing	This is likely to continue without allocation of sites to meet housing need due to the environmental constraints and the lack of large strategic development sites.
Population structure – ageing population	This creates specific needs for housing and services which are unlikely to be met without allocation of sites to meet housing and community needs.
Shortage of open spaces and recreation facilities	This is unlikely to be remedied without the specific recreation open space designations in the DPD. There is likely to be continued pressure for housing development on green open spaces.
Crime	Other organisations including the Police and local Community Safety Partnership have responsibility to reduce crime and fear of crime. However, the DPD could contribute to this process by promoting the redevelopment of derelict and vacant sites and facilitating new development that would be designed to reduce crime and fear of crime.
Education Achievement	Kent County Council has responsibility for education provision in the borough but in the absence of the DPD, land would not be allocated for provision of educational establishments and it would be more difficult to meet local needs.
Health	The Council works in partnership with other organisations to promote health in the borough through a broad range of initiatives. However, in the absence of the DPD, there would be less control on the location of development which

	might result in increases in air pollution and loss of green open space which would have an adverse impact on health.
Environmental	
Landscape Quality	A less rigorous approach to the location of development could have an adverse impact on landscape quality which would be particularly harmful within the AONB.
Access to Culture	The Council works in partnership with other organisations to promote access to culture in the borough through a broad range of initiatives. However, in the absence of the DPD, opportunities would be lost to provide new community facilities and to ensure that new housing developments have good access to facilities.
Biodiversity	The DPD directs development away from the most valuable habitats. A less rigorous approach to the location of development could have an adverse impact on biodiversity sites and reduce opportunities to provide linked green infrastructure.
Water quality	A less rigorous approach to the location of development could have an adverse impact on water quality.
Flooding	Proposals in the draft DPD, particularly in relation to Paddock Wood should ensure an improvement to the flood risk in the settlement. Without the DPD, these potential benefits might not be achieved.
Air Quality	The DPD seeks an efficient use of land, which should minimise loss of green field sites which contribute to air quality.
Renewable Energy	This DPD is unlikely to have a significant impact on renewable energy trends.
Waste/recycling	This DPD is unlikely to have a significant effect on waste/recycling trends.
Transport/congestion	The DPD seeks to locate development in sustainable locations which should minimise the need to travel and therefore help to maintain air quality. A less rigorous approach to site selection could have an adverse effect on transport/congestion.
Economic	
Pockets of deprivation in an otherwise affluent area	The DPD should increase access to community facilities and services. Location of development in sustainable locations improves access for residents without use of a car. The absence of specific allocations and designations for community facilities would contribute to a persistence of pockets of deprivation.
Loss of economic floor space	Due to recent changes in permitted development rights, changes in use from office to residential will take place without planning permission. This limits the ability of the

	DPD to address this issue. However, without the specific mixed use and employment allocations in the DPD, this loss of economic floor space would be likely to increase.
Facilitation of leisure and tourism	The DPD contains recreation open space designations and allocations for community facilities. In addition, it seeks to locate development close to services and facilities and promotes the enhancement of green corridors. In the absence of the DPD, there is greater risk of development on green open spaces and in less sustainable locations.

Sustainability Objectives

5.4 The updated review of policy context and baseline data is not considered to indicate that any changes are necessary to the sustainability objectives as set out in the Scoping Report 2011 and summarised below. Therefore these objectives have been used to assess the site allocations.

Table 14 Tunbridge Wells Borough Sustainability Objectives

1	Provide sufficient housing to meet identified needs, including affordable housing
2	Improve health and reduce health inequalities
3	Reduce poverty and increase social inclusion
4	Improve educational attainment and enhance the skills base
5	Reduce crime and the fear of crime
6	Improve quality, range and accessibility to all services and facilities
7	Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance
8	Reduce pollution (to land, air and soil) and greenhouse gas emissions
9	Protect and enhance water resources and manage flood risk and reduce the impact of flooding
10	Conserve and enhance biodiversity and geodiversity
11	Protect and enhance the natural and built environment and provide accessibility
12	Improve travel choice and reduce the need to travel, particularly by car/lorry to reduce traffic congestion
13	Reduce the impact of resource consumption and reduce waste generation and disposal
14	Increase energy efficiency and the proportion of energy generated from renewable sources
15	Facilitate and support a diverse employment base and sustainable economic growth

Section 6: Testing the DPD Objectives

Testing the DPD Objectives

6.1 The methodology for testing the DPD objectives is set out in Section 3 of this report.

6.2 The DPD objectives, which are the same as the objectives in the adopted Core Strategy, are set out in Tables 15 and 16 below.

Table 15 Draft Site Allocations DPD Strategic Objectives

SO1	To provide sufficient developable and deliverable land for a mix of uses and meet the borough's local and strategic requirements for housing; employment; and retail development and for other supporting infrastructure. To locate this development sustainably in and around existing settlements, and to conserve and enhance the borough's unique high-quality built and natural environment
SO2	To focus development at Royal Tunbridge Wells to stimulate and sustain the economic growth and competitiveness of Royal Tunbridge Wells as a Regional Hub in a way that also provides business opportunities for local people. Focusing development at the Regional Hub should not prejudice the need to support the rural economy by protecting and enhancing the vitality and viability of the borough's small rural towns; neighbourhood centres; village centres; and wider rural area
SO3	To target regeneration efforts where necessary, particularly in the borough's town centres and least affluent areas, to ensure that all current and future residents of the borough have the opportunity to access the services and facilities they require to meet their needs for housing; employment; education; health; and leisure inside the borough
SO4	To facilitate the provision of enhanced infrastructure, including green infrastructure, to support new and existing development, particularly where this can reduce the need to travel, and to encourage the use of sustainable modes of transport where travel remains necessary
SO5	To provide high quality housing to meet the needs of all sectors of the community, both now and in the future, including with affordable housing; homes for young and older people; and for those with special needs
SO6	To ensure the provision of high quality and well managed open space; natural open space; sports; play; recreational; community; and cultural facilities that are accessible to all people close to where they live
SO7	To promote a safe and healthy community that is inclusive of the needs of the communities that make up the borough's population

Table 16 Draft Site Allocations DPD Sustainable Development Objectives

SD1	To ensure that development takes account of the role and value of biodiversity and geodiversity; and aims to conserve and enhance locally important habitats, wildlife and geology
SD2	To maximise the use of previously developed land and of the existing property stock
SD3	To ensure that development is consistent with the principle of living within environmental limits by conserving finite non-renewable resources, including land, energy, water, soil and air quality wherever possible and ensuring that any trade-offs are made in an explicit and transparent way

SD4	To avoid making adverse contributions to climate change, having regard to the potential impacts of already-unavoidable long-term changes and (where possible) mitigating such impacts
SD5	To ensure development gives full consideration to good design principles, including energy efficiency, use of renewable energy technologies and sustainable construction

6.3 The sustainability objectives used for the Sustainability Appraisal are defined in the Scoping Report 2011 and are set out in Table 17 below.

Table 17 SA Objectives

1	Provide sufficient housing to meet identified needs, including affordable housing
2	Improve health and reduce health inequalities
3	Reduce poverty and increase social inclusion
4	Improve educational attainment and enhance the skills base
5	Reduce crime and the fear of crime
6	Improve quality, range and accessibility to all services and facilities
7	Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance
8	Reduce pollution (to land, air and soil) and greenhouse emissions
9	Protect and enhance water resources and manage flood risk and reduce the impacts of flooding
10	Conserve and enhance biodiversity and geodiversity
11	Protect and enhance the natural and built environment and provide accessibility
12	Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion
13	Reduce the impact of resource consumption and reduce waste generation and disposal
14	Increase energy efficiency and the proportion of energy generated from renewable resources
15	Facilitate and support a diverse employment base and sustainable economic growth

6.4 The compatibility of the SA objectives and the DPD objectives were tested and the results are set out in Table 18 below.

Table 18 The Compatibility of the SA Objectives and the DPD Objectives

DPD Objective	Sustainability Objective														
	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient Land use	Pollution	Water/ flood risk	Bio diversity	Natural/ built environment	Transport	Waste	Energy	Employment
SO1	/	?	/	/	/	/	/	?	?	?	?	/	?	?	/
SO2	/	?	/	/	/	/	/	?	/	?	?	/	-	/	/
SO3	/	/	/	/	/	/	/	/	?	/	/	/	/	/	/
SO4	/	/	/	/	/	/	/	?	/	/	/	/	/	/	/
SO5	/	/	/	-	/	-	?	/	?	?	/	?	?	/	?
SO6	?	/	/	/	/	/	?	/	/	/	/	/	/	/	/
SO7	?	/	/	-	/	/	/	/	/	/	/	/	/	/	/
SD1	?	/	/	/	?	/	/	/	/	/	/	/	/	-	?
SD2	/	?	/	-	/	?	/	/	/	?	?	/	/	/	?
SD3	?	/	-	-	-	?	/	/	/	/	/	/	/	/	?
SD4	?	/	/	-	-	-	/	/	/	/	/	/	/	/	?
SD5	/	/	/	/	/	/	/	/	/	/	/	/	/	/	?

Key

/	Objectives are compatible
?	Compatibility is unclear
X	Objectives are incompatible
-	No obvious relationship between the objectives

6.5 Most of the Site Allocations DPD Objectives are compatible with the Sustainability Appraisal Objectives. Overall, it demonstrates that the Site Allocations DPD Objectives are broadly sustainable. No objectives are considered to be incompatible. However, as summarised in Table 19 below, compatibility is described as unclear in some cases. Where there is any uncertainty over compatibility between two sets of objectives, this can be addressed through careful policy wording to ensure that objectives are aligned as far as possible.

Table 19 Summary of objectives with uncertain compatibility

DPD Objective	Sustainability Objectives having uncertain compatibility
SO1	Health, pollution, water/flood risk, biodiversity, natural/built environment, waste, energy
SO2	Health, pollution, water/flood risk, biodiversity, natural/built environment
SO3	Water/flood risk
SO4	Pollution
SO5	Efficient use of land, water/flood risk, biodiversity, transport, waste, employment
SO6	Housing need, efficient use of land
SO7	Housing need
SD1	Housing need, crime, employment
SD2	Health, service provision, biodiversity, natural/built environment, employment
SD3	Housing need, service provision, employment
SD4	Housing need
SD5	Employment

6.6 The Site Allocations DPD Objectives SO1, SO2 and SO3 focus on providing sufficient developable and deliverable land for a mix of uses, with a focus on Royal Tunbridge Wells as a Regional Hub and targeting regeneration in town centres and least affluent areas. Compatibility is uncertain between DPD Objectives SO1 and SO2 and the sustainability objectives relating to health, pollution, water/flood risk, biodiversity and the natural/built environment. This is because of the inherent tension between bringing forward land for development to meet identified needs and protecting the natural environment, particularly green open spaces which have a role in providing sites for active leisure, contribute to air quality, reduce flood risk, provide habitats for wildlife and have landscape and townscape value. However, the objectives are not incompatible provided that policies are drafted to ensure that development proposals are located in the most sustainable locations and require mitigation of any potential negative effects. Temporary conflict with sustainability objectives during construction, such as air quality and noise, can be avoided through applying planning conditions.

6.7 Any new development is likely to increase demand for energy and water and increase waste creation. DPD Objective SO2 is compatible with objectives relating to energy and waste, as it focuses development on previously developed sites in sustainable locations which will minimise the need to travel and provide travel choice. DPD Objective SO1 could be compatible with these sustainability objectives provided that policies require homes to be of sustainable design and in sustainable locations.

6.8 Compatibility is uncertain between DPD Objective SO4 to facilitate enhanced infrastructure and the sustainability objective relating to pollution. New or widened roads would be likely to be conflict with this objective although they could improve local air quality by reducing congestion. Footpaths, cycleways

and particularly green corridors would be directly compatible. Provision should be made for green infrastructure, particularly where it can promote access to services on foot and bicycle. Green infrastructure has multiple benefits including improving individual health and making improvements to air quality.

6.9 Compatibility is uncertain between DPD Objective SO5, which is to provide high quality housing for all sectors of the community, and water/flood risk as meeting development need may create demand for development within flood areas.

6.10 Compatibility is also uncertain between DPD Objective SO5 and the sustainability objectives relating to efficient use of land, biodiversity, transport, waste and employment. Ensuring appropriate housing for all sectors may increase the need for housing land which could impact on these objectives.

6.11 Compatibility is uncertain between DPD Objective SO6 to ensure provision of open space and sustainability objectives relating to housing need and efficient use of land. Retaining open space of landscape, recreation and biodiversity value in built up areas may reduce opportunities to locate new development within existing settlements. Provision of open space within sites may also reduce housing densities, requiring designation of larger areas for development to meet housing need. However, these objectives could also be compatible with retaining open countryside.

6.12 Compatibility is uncertain between DPD Objective SO7 to promote safe, healthy communities and the sustainability objective to meet housing need. The objectives could be compatible as poor housing and homelessness have a negative impact on health and safety. However, provision of housing, particularly on greenfield sites, may reduce opportunities for informal recreation and sport and may reduce air quality and increase risk of flooding. To increase compatibility, new housing should be located on previously developed land where possible and should incorporate or have good access to green open space and landscaping.

6.13 Compatibility is uncertain between DPD Objectives SD1 to SD5 and sustainability objectives relating to employment. This is because these objectives may limit the availability of land for employment use and the feasibility of businesses. However, protection of the high quality environment provides an attractive location for business and pleasant working conditions. Also these objectives should help to promote sectors of employment related to sustainable technologies and energy production. They should also help to promote the vitality of town centres. Compatibility can be increased by ensuring policies provide an adequate land supply in sustainable locations to meet employment development needs.

6.14 Compatibility is uncertain between DPD Objective SD1 to take account of biodiversity and geodiversity and sustainability objectives relating to housing need and crime. Protection of biodiversity and geodiversity may affect the availability of sites available for housing needs. Measures to reduce crime may have a negative impact on biodiversity through for example the provision of lighting. However, new development can provide opportunities for biodiversity enhancement and the creation of new habitats. Consideration should be given to the reduction of crime through safe design, without compromising the natural and built environment by removal of significant features or excessive lighting.

6.15 Compatibility is uncertain between DPD Objective SD2 to maximise use of previously developed land and existing property and sustainability objectives relating to health, service provision, biodiversity and natural/built environment. Re-using previously developed land can create pressure to increase densities and develop spaces in built up areas which have health, recreation, biodiversity, landscape and townscape value. Contaminated land can also raise health issues. However, this objective should minimise use of greenfield land which would promote these objectives. Mitigation of previously contaminated land would benefit health objectives.

6.16 Compatibility is uncertain between DPD Objective SD3 to live within environmental limits and sustainability objectives relating to housing need, service provision and employment. New housing, community or employment development is likely to increase demand for resources unless the development is of sustainable design and location.

6.17 Compatibility is uncertain between DPD Objective SD4 on climate change and sustainability objectives relating to housing need. Development of greenfield sites may contribute to future climate change by reducing vegetation which absorbs Carbon dioxide and pollutants which contribute to climate change. In addition it may reduce the cooling effect of vegetation, increase flood risk by reducing natural drainage and affect the ability of species to adapt to climate change by interrupting wildlife corridors. New housing may also contribute to carbon fuel use. However, if housing is located on previously developed sites, incorporates soft landscaping and green open spaces, is designed and located to minimise carbon energy use and incorporates Sustainable Drainage Systems (SuDS) it could have a positive impact on this climate change objective.

Section 7: Sustainability Appraisal of Sites

7.1 The methodology for sustainability appraisal of sites is set out in Section 3 of this report.

7.2 For each settlement, sustainability appraisals were carried out for all sites identified in the evidence gathering stage except those excluded at Stage 4 as explained in the methodology (paragraph 3.22). A cumulative sustainability appraisal was then carried out on those sites allocated or designated in the Consultation Draft of the Site Allocations DPD. Following consultation, the individual site matrices and cumulative appraisal were amended where necessary to reflect changes made in the Submission Draft of the DPD.

Royal Tunbridge Wells

Sustainability Appraisal

7.3 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Royal Tunbridge Wells are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, changes have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Appraisal

7.4 The cumulative impact appraisal relates only to sites allocated in the Submission Draft DPD. The sustainability appraisals for sites relating to Royal Tunbridge Wells are summarised in Table 20 below. The bottom row gives the predicted cumulative impact of the sites according to the methodology set out in Section 3.

7.5 The table indicates that a significant beneficial impact is predicted in relation to housing need, social inclusion, crime, efficient land use and transport. These impacts are discussed in more detail in the commentary Table 21 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce adverse effects. In the preparation of the consultation draft, the Council responded to these suggestions (see Appendix 4) and included them in the development parameters of the individual site allocations where appropriate.

7.6 In terms of timescales, there is no formal phasing of development in the allocations document. However the Council anticipates that, whilst some sites may come forward early in the Plan Period, others will require the development of a comprehensive masterplan to conserve and enhance the heritage assets of the town in line with Core Policy 9. Development in these areas is likely to be towards the middle of the Plan period. Therefore, it is anticipated that the full cumulative impacts would not occur until the medium or longer term.

Table 20 Royal Tunbridge Wells – Summary of Policies Together with Cumulative Impact

Ref	DPD Policy		Sustainability Objective													
	Name	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient land use	Pollution	Water/Flood Risk	Bio-diversity	Natural/Built Environment	Transport	Waste	Energy	Employment
AL/STR1	Limits to Built Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/STR3	Safeguarding Former Railway Lines	0	+	+	0	+	0	+	+	+	+	+	+	0	0	0
AL/RTW1	Urban Design Framework	0	+	+	0	+	+	+	+	+	+	+	+	0	0	0
AL/RTW2A	Town Hall Site, The 'Civic Complex' Area of Change	+	?	?	?	+	?	?	0	0	?	+	?	0	+	+
AL/RTW2B	Former Cinema Site Area of Change	?	0	+	0	+	+	+	?	0	0	?	+	0	0	?
AL/RTW3	Vale Avenue Area of Change	+	?	+	0	+	+	+	-	0	?	?	+	0	+	+
AL/RTW4	ErIDGE Road Area of Change	?	?	+	0	+	+	?	?	-	-	-	+	0	0	+
AL/RTW5	36-46 St Johns Road (Arriva bus depot)	+	0	0	0	0	0	+	-	0	+	+	-	0	0	-
AL/RTW6	Former Plant and Tool Hire, ErIDGE Road	+	0	?	0	+	+	+	-	-	+	+	+	0	0	0
AL/RTW7	Homeopathic Hospital, Church Road	+	-	?	0	0	?	+	-	0	?	?	+	0	0	-
AL/RTW8	Land at the Rifle Range, Warwick Park	+	?	?	0	0	+	+	?	0	-	-	+	+	+	?
AL/RTW9	Lifestyle Motor Europe, Langton Road	+	0	+	0	0	+	+	+	0	?	+	+	0	0	-
AL/RTW10	Former Gas Works, Sandhurst Road	+	+	+	0	+	?	+	+	?	-	-	0	0	?	?
AL/RTW11	Land at Goods Station Road	+	0	+	0	0	+	+	+	0	?	+	+	0	0	-
AL/RTW12	Land at Quarry Road	+	+	+	?	+	+	+	?	0	?	+	+	0	0	0
AL/RTW13	TW Telephone Engineering Centre, Broadwater Lane	+	+	+	?	+	-	+	0	0	?	+	+	0	0	--
	The WA Turner Factory, Broadwater Lane	+	+	+	?	+	-	+	-	0	?	+	+	0	0	--
AL/RTW14	Land at Medway Road (east)	+	0	0	0	0	0	+	+	0	?	?	+	0	0	--
AL/RTW15	123-129 Silverdale Road	+	0	0	0	+	?	+	+	0	0	+	+	0	0	-
AL/RTW16	Beechwood Sacred Heart School	+	?	+	0	0	+	-	0	0	-	-	?	0	0	0

DPD Policy		Sustainability Objective																			
AL/RTW17	Former Builders' Yard	+	0	+	0	0	+	+	+	+	+	+	+	+	+	+	0	0	0	-	
AL/RTW18	Land at Unigate Dairy, St Johns Road	+	?	+	0	0	-	+	+	+	+	?	?	?	?	?	0	0	0	-	
AL/RTW19	Land at Royal Victoria Place	0	?	-	?	+	-	+	+	+	+	+	0	?	?	?	0	0	0	-	
AL/RTW20	77 Mount Ephraim (Sturge House, Brockborne House)	0	?	+	0	?	?	?	?	?	?	?	?	?	?	?	0	0	0	+	
AL/RTW21	Mount Pleasant Avenue Car Park	+	+	+	0	+	+	+	+	+	+	?	?	?	?	?	0	0	?	+	
AL/RTW22	Site of Lifestyle Ford, Mount Ephraim/Culverden St/Rock Villa Road	+	0	+	0	+	?	?	?	?	?	?	?	?	?	?	0	0	0	?	
AL/RTW23	John Street Car Park	+	0	?	0	+	?	+	+	+	+	?	?	?	?	?	0	0	0	+	
AL/RTW24	Land off Grove Hill Road, 8-16 Grove Hill Road	?	?	+	0	+	+	+	+	+	+	?	?	?	?	?	0	0	0	+	
AL/RTW25	Auction House and Car Park, Linden Park Road	?	?	?	0	+	+	+	+	+	+	?	?	?	?	?	0	0	0	?	
AL/RTW26	Kenwood House, Upper Grosvenor Road	+	0	+	0	+	+	+	+	+	+	+	+	+	+	+	0	0	0	+	
AL/RTW27	RTW Key Employment Area	0	0	0	0	+	?	+	+	+	+	?	?	?	?	?	0	0	0	++	
AL/RTW28	North Farm/Longfield Road Key Employment Area	0	0	0	0	+	?	+	+	+	+	?	?	?	?	?	0	0	0	++	
AL/RTW29	Royal Tunbridge Wells Town Centre Boundary and PSA	0	0	0	0	+	?	+	+	+	+	?	?	?	?	?	0	0	0	+	
AL/RTW30	Neighbourhood Centres	0	0	0	0	+	?	+	+	+	+	?	?	?	?	?	0	0	0	+	
AL/RTW31	Recreation Designations	0	+	+	?	+	?	+	+	+	+	+	+	+	+	+	0	0	0	0	
AL/GB2	Knights Way *	+	-	-	0	+	-	--	--	--	--	--	--	--	--	--	0	0	0	0	
AL/GB2	Land at Knights Park	+	-	-	0	+	-	--	--	--	--	--	--	--	--	--	0	0	0	0	
AL/GB3	Land at Hawkenbury Farm	+	?	+	0	+	0	--	--	--	--	--	--	--	--	--	0	0	0	0	
Cumulative impact		++	?	++	?	++	?	++	++	++	+	?	?	?	+	++	?	0	0	+	?

*The site at Knights Way forms part of the larger site, Land at Knights Park. To avoid double counting, the Knights Way site has been excluded from the calculation of cumulative impact.

Table 21 Royal Tunbridge Wells - Commentary on Cumulative Impact of Policies

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Housing need</p> <p>Provide sufficient housing to meet identified needs, including affordable housing</p>	<p>Strongly beneficial</p>	<p>The allocations have the potential to make a considerable contribution to the new development required in Royal Tunbridge Wells in the Core Strategy paragraph 5.140 and Policy CP9. Core Strategy policy CP6 requires that residential development incorporates affordable housing and a mix of dwelling types and sizes according to local needs. CP5 and Building Regulations require new development to be of sustainable design and construction. The timescale for these benefits is dependent on the rate at which development comes forward but may occur in the short/medium or long term. All sites are currently considered available for development. It is anticipated that some sites will come forward in the short term, but many are likely to be implemented in the medium to longer term. The impact will be permanent or until such time as housing demand again exceeds supply.</p>	<p>None proposed</p>
<p>Health</p> <p>Improve health and reduce health inequalities</p>	<p>Uncertain</p>	<p>The policies will have a mixed impact on health. 11 uncertain impacts are expected, 9 minor beneficial impacts and 2 minor negative impacts. The minor negative impacts relate to the potential loss of health facilities at the Homeopathic Hospital and the loss of woodland used for informal recreation at Knights Park. On a number of sites the uncertain impact could become a positive impact through ensuring enhancement of green open space networks, remediation of contaminated land, alternative provision of health and recreation facilities and careful transport planning to avoid any additional traffic and congestion on local roads and in the town centre which might otherwise reduce air quality and impact on quality of life. However, Policy CP5 should ensure that new development is safe and of high quality and Policy CP8 that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. In the short/medium term there will be temporary adverse impacts associated with construction noise and traffic.</p>	<p>Opportunities should be sought to incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle.</p> <p>Opportunities to create/enhance a network of interconnected green open spaces suitable for informal recreation and formal recreation and play space which could benefit health objectives through promoting walking, cycling and general well-being and by helping to maintain air quality.</p> <p>Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments.</p> <p>Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Social Inclusion</p> <p>Reduce poverty and increase social inclusion</p>	<p>Significant beneficial</p>	<p>23 minor beneficial impacts are anticipated and 3 minor adverse impacts, creating a significant cumulative beneficial impact on social inclusion. The majority of sites lie within the LBD allowing moderate or good non-car access to facilities and to the open countryside and are on previously developed land, minimising loss of greenfield land used for informal recreation. These allocations should improve access to affordable housing as policies CP6 and CP9 require that new residential development incorporates affordable housing and creates a mix of housing types and tenures. The majority of the sites have sufficient capacity to be required to provide an element of affordable housing. The sites allocated for mixed or employment uses should create opportunities for local employment. The redevelopment of sites under Policy AL/RTW13 creates the opportunity for new local services, a reduction in heavy traffic and improvement in quality of life for residents of the Ramsiye area. These effects would be permanent and could occur in the short/medium term depending on when development comes forward. Long term effects may be reduced if demand for affordable housing increases. Knights Park is not well related to existing shops and services and is likely to have a minor adverse impact, unless facilities are provided on site.</p>	<p>Opportunities should be sought to incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle.</p> <p>At Knights Park mixed use including the provision of local shops and services should be sought.</p>
<p>Education</p> <p>Improve educational attainment and enhance the skills base</p>	<p>Uncertain</p>	<p>Most of the site allocations will have no significant impact but the general policies AL/STR1-2 may enhance access to education.</p>	<p>None proposed</p>
<p>Crime</p> <p>Reduce crime and the fear of crime</p>	<p>Significant beneficial</p>	<p>17 minor beneficial impacts are expected and no adverse impacts, while all other impacts except one are predicted not to be significant. The benefits are mainly related to the redevelopment of vacant and/or derelict sites and car parks which can be a focus for vandalism and other crime. The allocations provide an opportunity for urban regeneration and townscape enhancement. Policy CP5 requires new development to create safe environments.</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Service provision</p> <p>Improve quality, range and accessibility to all services and facilities</p>	<p>Uncertain</p>	<p>20 minor beneficial impacts are expected and 8 minor adverse impacts. The other impacts are not significant or are uncertain. The potential minor adverse impacts generally relate to the potential loss of existing services including a bus depot, dairy and parking. The impact will therefore only be negative if the sites are needed and no alternative provision is made. The impact will also depend on the mix of uses provided on the redeveloped sites. Policy AL/RTW13 may have an adverse impact through placing strain on existing services. However, Policy CP8 should ensure that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. Both sites have the potential to incorporate new community facilities. Several sites have the potential to provide local employment opportunities. The sites are all edge of or within the settlement allowing moderate or good non-car access to facilities and to the open countryside. However, Policy AL/GB2 Knights Park is not well related to existing shops and services but the policy requires provision of a primary school and community facilities on site.</p> <p>Any impacts would be permanent.</p>	<p>Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside.</p> <p>Where redevelopment may cause a loss of or place strain on existing services or facilities, alternative provision should be sought on-site or off-site to maintain or enhance access to services and facilities.</p> <p>Any development should seek to maintain or enhance local employment opportunities.</p> <p>On sites at Knights Park and Knights Way, mixed use including the provision of local shops and services should be sought.</p>
<p>Efficient land use</p> <p>Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance</p>	<p>Significant beneficial</p>	<p>31 minor beneficial impacts are expected on this objective and 2 minor and 2 significant negative impacts. 4 uncertain impacts are expected. The majority of the sites lie within or predominantly within the Limits to Built Development with only sites at Hawkenbury (Policy AL/GB3) and Knights Park/Knights Way (Policy AL/GB2) fully outside the LBD. According to the methodology of this appraisal this gives an expected significant beneficial cumulative impact. However, the predominantly greenfield sites which lie partially or completely outside the LBD, Sites at Knights Park/Knights Way, Hawkenbury and Beechwood Sacred Heart, whilst relatively small in number, represent a significant area of land.</p>	<p>Seek efficient use of land within the greenfield sites to retain a network of green open space particularly that with landscape, biodiversity, natural drainage or heritage value.</p>
<p>Pollution</p>	<p>Significant adverse</p>	<p>11 minor adverse impacts and 8 positive impacts are predicted. Although the majority of sites are on previously developed land, it is likely that redevelopment will result in an intensification of use</p>	<p>Temporary adverse impacts during the construction phase should be minimised by appropriate planning conditions.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>		<p>which may increase traffic movements and greenhouse gas emissions. New housing development on greenfield land is likely to reduce vegetation which acts as a carbon sink and promotes air quality. A number of sites lie within an Air Quality Management Area. Temporary adverse effects may occur during construction. However, any pollution should be minimised by policies CP3 and CP5 of the Core Strategy, by Building Regulations and Environmental Protection Legislation. In addition the majority of sites are located within or close to the town centre, which encourages travel by foot and bicycle.</p>	<p>Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality.</p> <p>Seek to minimise congestion on local roads arising from the developments.</p> <p>Encourage Low Emissions Strategies, particularly within the AQMA, in accordance with paragraph 5.118 of the Core Strategy.</p> <p>On Knights Park/Knights Way mixed use including the provision of local services should be sought.</p>
<p>Water/flood risk Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	<p>Uncertain</p>	<p>26 impacts on flooding are likely not to be significant. 2 minor adverse impacts (AL/RTW4 and AL/RTW6) are expected on sites which lie partially within flood zones. Impacts are expected to be uncertain on 6 sites. New housing development on greenfield land will reduce natural drainage and water storage which has the potential to reduce water reaching the water table and to increase the risk of flooding. However, Policy CP5 seeks to reduce adverse impacts. Sites allocated under policies AL/GB2, AL/RTW10 and AL/RTW28 have surface water features within or adjoining the sites. The impacts would be permanent.</p>	<p>Sustainable Drainage Systems (SuDS) and soft landscaping should be required to maintain or enhance natural drainage</p> <p>Ensure that quality of surface water features such as ponds and streams is maintained</p> <p>Require development on sites affected by flood issues to incorporate any necessary flood prevention and measures to increase sustainability.</p> <p>Ensure the layout and location of development within the greenfield sites takes into account natural drainage.</p> <p>Seek to create/enhance the network of interconnected green open spaces which could benefit natural drainage and reduce flood risk.</p>
<p>Biodiversity Conserve and enhance biodiversity</p>	<p>Uncertain</p>	<p>7 minor beneficial impacts are expected, 5 minor adverse impacts, 1 significant adverse impacts, 4 not significant impacts and 21 uncertain impacts. Only 1 site is designated for biodiversity value.</p>	<p>Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space. Retain ancient woodland.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
		<p>Approximately 64% of Knights Park is designated as ancient woodland and 53% as LWS. Merevale House (Policy AL/RTW3) incorporates Common Land designated as a LWS. Some sites adjoin land of biodiversity value. The greenfield sites comprise grassland, hedgerows, woodland and some specimen trees which will have biodiversity value. The development of greenfield sites is likely to have an adverse impact on biodiversity. Other sites (AL/RTW8 and AL/RTW10) are considered likely to have a minor adverse impact due to the potential loss of woodland and scrub land. The redevelopment of the other previously developed sites is unlikely to have a significant impact on biodiversity, provided that trees are protected where possible. There is some scope for enhancement of biodiversity value on these sites. Policy CP4 seeks to ensure no net loss of biodiversity across the borough. Policy CP9 requires development to conserve and enhance the biodiversity assets of Royal Tunbridge Wells.</p>	<p>Incorporate measures to enhance the biodiversity value of the sites, particularly the previously developed sites which currently have little or no vegetation. . .</p> <p>Seek to create or enhance a network of interconnected green open spaces which could benefit biodiversity by providing linked habitats.</p> <p>Maintain or enhance the biodiversity of any Commons Land or woodland which is designated as a Local Wildlife Site</p> <p>Ensure that any development does not have a negative impact on adjoining sites with biodiversity value.</p>
<p>Natural/built environment</p> <p>Protect and enhance the built environment and the countryside</p>	<p>Uncertain</p>	<p>23 minor beneficial impacts are expected through the redevelopment of poor quality, vacant and/or in some cases derelict land and buildings, some within Conservation Areas or affecting the setting of Listed Buildings. 5 potential minor adverse impacts are identified due to the potential loss of green open space, woodland and specimen trees and possible adverse impacts on the landscape setting of Royal Tunbridge Wells, Areas of Landscape Importance and/or Areas of Important Open Space. 1 significant adverse impact is predicted. Knights Park/Way is an extensive greenfield site incorporating woodland and green open space which forms part of the landscape setting of Royal Tunbridge Wells. Knights Park includes Green Belt and AONB land. 9 uncertain impacts are predicted. Any potential adverse impacts should be reduced by Core Policy CP9 which requires new development to conserve and enhance the landscape and heritage assets of Royal Tunbridge Wells, including the AONB and to secure its special character in the long term. In addition, Policy CP5 requires that developments will be of high-quality design and conserve and enhance the public realm. The impacts would be permanent.</p>	<p>Existing woodland, specimen trees and hedgerows should be protected and enhanced where possible.</p> <p>Any development on edge of settlement sites adjoining and within the AONB should pay particular attention to enhancing the landscape setting of the town.</p> <p>Any development should maintain or enhance the character and setting of the Royal Tunbridge Wells Conservation Area and listed buildings.</p> <p>All development should be required to conserve/enhance local character and distinctiveness.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Transport</p> <p>Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion</p>	<p>Significant beneficial</p>	<p>24 minor beneficial impacts are anticipated on this objective which will create a significant cumulative benefit. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. 2 minor adverse impacts are expected, 3 not significant impacts and 9 uncertain impacts. The potential minor adverse impact relates to Knights Park which is in a less accessible location and does not incorporate park and ride. Some sites have the potential to provide employment, shops and services in accessible locations within the LBD thus reducing the need to travel. However new development is likely to generate traffic movements which may cause local congestion. Policies CP9 and CP3 should ensure that sustainable transport is promoted.</p>	<p>Any site masterplans should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle.</p> <p>Any development should ensure that there is no negative impact on transport choice through the loss of the bus depot and parking. Alternative provision should be made if deemed necessary.</p> <p>On Knights Park/Knights Way mixed use including the provision of local services should be sought to reduce the need to travel.</p>
<p>Waste</p> <p>Reduce the impact of resource consumption and reduce waste generation and disposal</p>	<p>No significant impact</p>	<p>Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.</p>	<p>None proposed</p>
<p>Energy</p> <p>Increase energy efficiency and the proportion of energy generated from renewable resources</p>	<p>No significant impact</p>	<p>Residential development on previously undeveloped sites will generate an increase in energy use but Core Policy 5 requires that all new development must implement the South East Plan renewable energy and energy efficiency targets.</p>	<p>None proposed</p>
<p>Employment</p>	<p>Uncertain</p>	<p>The impacts on this objective are mixed. 13 not significant impacts or uncertain impacts are anticipated. Policy AL/RTW27 and policy AL/RTW28 (Key Employment Areas) are likely to have a significant</p>	<p>Ensure that sufficient employment land is allocated to offset any potential loss of employment through the redevelopment of allocated sites.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Facilitate and support a diverse employment base and economic growth		<p>beneficial impact by creating new local employment and 11 minor beneficial impacts are expected. However, 3 significant adverse impacts and 9 minor adverse impacts are anticipated. The adverse impacts relate to the possible loss of current employment sites to non-employment uses. The actual cumulative impact will depend on the mix of uses brought forward on the allocated sites and the level of alternative employment provision implemented through Core Policy CP7. It is possible that the replacement of these older employment buildings by more modern facilities elsewhere in the town would have a significant beneficial impact. Residential development should help to support the local economy and the vitality and viability of the town centre. There will be temporary beneficial impacts on employment during the construction phase on allocated sites.</p>	

Southborough

Sustainability Appraisal

7.7 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Southborough are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, changes have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Sustainability

7.8 The cumulative appraisal relates only to sites allocated in the Submission Draft DPD. The sustainability appraisals for policies relating to Southborough are summarised in Table 22 below. The bottom row gives the predicted cumulative impact of the policies according to the methodology set out in Section 3.

7.9 The table indicates that minor beneficial impacts are predicted in relation to housing need, social inclusion, service provision, crime, efficient land use, natural/built environment and employment. No adverse impacts are anticipated. These impacts are discussed in more detail in the commentary Table 23 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce adverse impacts. In the preparation of the consultation draft, the Council responded to these suggestions (see Appendix 4) and included them in the development parameters of the individual site allocations where appropriate.

7.10 In terms of timescales, there is no formal phasing of development in the DPD. Since all the sites are considered to be available and developable, it is possible that they could come forward for development at any point during the plan period. However, Southborough Hub involves multiple land ownership and is unlikely to be developed in the short term. It is anticipated therefore, that the full cumulative impacts would not occur until the medium to long-term.

Table 22 Southborough – Summary of Policies together with Cumulative Impact

Ref	DPD Policy		Sustainability Objective													
	Name	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient land use	Pollution	Water/ Flood Risk	Bio-diversity	Natural/ Built Environment	Transport	Waste	Energy	Employment
AL/STR1	Limits to Built Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/SO1	Land at Yew Tree Road (Southborough Library)	+	?	-	-	0	-	?	-	0	?	-	+	?	?	-
AL/SO2	Southborough Hub (Area 1), London Road	+	?	?	?	+	?	?	-	0	-	?	+	0	+	?
AL/SO3	Southborough Hub (Area 2) The Ridgeway	0	+	+	?	+	+	?	?	+	+	+	0	0	0	0
AL/SO4	Land east of London Road	0	+	+	0	+	+	+	0	0	0	0	0	0	0	0
AL/SO4	Southborough High Brooms Key Employment Area	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/SO5	Town Centre Boundary and PSA	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/SO6	Neighbourhood Centres	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/GB1	Speldhurst Road, former allotments	+	-	+	0	0	+	?	0	0	-	-	+	0	0	0
Cumulative Impact		+	?	+	?	+	+	?	?	?	?	+	?	0	0	+

Table 23 Southborough - Commentary on Cumulative Impact of DPD Policies

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Housing need</p> <p>Provide sufficient housing to meet identified needs, including affordable housing</p>	<p>Minor beneficial</p>	<p>The variety of uses currently on the previously developed sites and the mix of uses to which they may be put, makes it difficult to predict the cumulative impact on this objective. All the sites have the potential to provide an element of residential use when developed. It is likely that this will create a net increase in units which would have a beneficial impact on housing supply, but this is uncertain at this stage. Any net increase would help to meet the housing need identified in the Core Strategy paragraph 5.140 and Policy CP10. Core Strategy Policy CP6 requires that residential development incorporates affordable housing and a mix of dwelling types and sizes according to local needs. CP5 and Building Regulations require new development to be of sustainable design and construction. The timescale for these impacts is dependent on the rate at which development comes forward but may occur in the short/medium or long term. The impacts will be permanent or until such time as housing demand again exceeds supply.</p>	<p>Seek an element of housing as part of the mixed use of the site.</p>
<p>Health</p> <p>Improve health and reduce health inequalities</p>	<p>Uncertain</p>	<p>Any additional housing may generate additional traffic and congestion on local roads and in the town centre which could reduce air quality and impact on quality of life. This is a potential issue on the Southborough Hub site which lies within the Air Quality Management Area and buffer zone. However, on the three previously developed sites any increase in air pollution is likely to be minor. Policy CP5 should ensure that new development is safe and of high quality and Policy CP8 that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. The community hub could include sports facilities, but development on this site may also result in some loss of sports pitches. In the short/medium term there will be temporary adverse impacts associated with construction noise and traffic. The sites are all within the LBD within walking distance of the town centre which should promote walking and cycling.</p>	<p>All proposals should incorporate measures to promote access to Southborough town centre, open countryside, recreation and community facilities by foot and bicycle.</p> <p>Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments.</p> <p>Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions.</p>
<p>Social Inclusion</p>	<p>Minor beneficial</p>	<p>The impact of the Southborough Hub is uncertain as redevelopment may result in the enhancement of community facilities in an accessible location and creation of local employment opportunities but may also cause some loss of accessible sports pitches. The Southborough Road former</p>	<p>Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance non-car access to facilities and the countryside.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Reduce poverty and increase social inclusion		allotments sites is likely to have a minor beneficial impact depending on the use for which it is redeveloped being well located relative to public transport and the town centre. However, these allocations may improve access to affordable housing as policies CP6 and CP10 require that new residential development incorporates affordable housing and creates a mix of housing types and tenures. The Southborough Hub is within the LBD with good non-car access to facilities. These effects would be permanent and could occur in the short/medium term depending on when development comes forward.	Ensure that the community hub retains and enhances the range of accessible facilities and services in Southborough town centre and that any loss of recreation open space is minimised.
Education Improve educational attainment and enhance the skills base	Uncertain	The Southborough Hub (Area 1) allocation will be expected to provide facilities for a range of used and the general policies AL/STR1-2 may enhance access to education.	None proposed
Crime Reduce crime and the fear of crime	Minor beneficial	Policy CP5 requires new development to create safe environments. The new community facilities at the Southborough Hub may reduce anti-social behaviour through the redevelopment of currently vacant/derelict land and the enhancement of community facilities.	None proposed
Service provision Improve quality, range and accessibility to all services and facilities	Minor beneficial	The overall impact of the Southborough Hub depends on the range of facilities provided in the new community hub. If the new development incorporates community, retail and/or residential uses the allocation could have a strongly beneficial impact through enhancing community facilities in a highly accessible location. The impact on local employment opportunities of redeveloping the Southborough Hub is uncertain depending on the new uses developed. All the brownfield sites are within the LBD allowing good non-car access to facilities and to the open countryside. Policy CP8 should ensure that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. Any impacts would be permanent.	Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. Ensure that the community hub retains and enhances the range of facilities and services in Southborough town centre and that any loss of recreation open space is minimised

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Efficient land use Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance</p>	<p>Minor beneficial</p>	<p>The sites are all located within the LBD and are predominantly on previously developed land which represents efficient use of land. The cumulative impact of all the sites will depend on the density and layout of the new developments and whether green open space is retained.</p>	<p>None proposed</p>
<p>Pollution Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>	<p>Uncertain</p>	<p>Any intensification of use at the Southborough Hub may generate traffic movements within an AQMA and its buffer zone which would have a minor adverse impact on air quality. Temporary negative effects may occur during construction. However, any pollution should be minimised by policies CP10, CP3 and CP5 of the Core Strategy, by Building Regulations and Environmental Protection Legislation. In addition, the sites are located close to or within the town centre, which encourages travel by foot, bicycle and bus.</p>	<p>Temporary negative effects during the construction phase should be minimised by appropriate planning conditions. Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality. Seek to minimise congestion on the A26 and residential roads arising from the developments. Ensure a network of foot and cycle paths that will encourage non-motorised forms of transport, particularly within the AQMA and AQMA buffer zone.</p>
<p>Water/flood risk Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	<p>Uncertain</p>	<p>New housing development on greenfield land will reduce natural drainage and water storage which has the potential to reduce water reaching the water table and to increase the risk of flooding. However, the Southborough Hub is predominantly previously developed land. Policy CP5 seeks to reduce adverse impacts. None of the sites have surface water features or are in flood risk zones.</p>	<p>Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain or enhance natural drainage Ensure the layout and location of development takes into account the natural drainage value of green open space and vegetation.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Biodiversity</p> <p>Conserve and enhance biodiversity</p>	<p>Uncertain</p>	<p>None of the allocated sites are designated for biodiversity value. However, the development of greenfield sites will impact on biodiversity. The sites comprise a variety of habitats including trees, hedgerows and green open space which could be improved upon at Land at Speldhurst Road and Southborough Hub (Area 2).</p>	<p>Where possible conserve or enhance trees and hedgerows on site and retain/introduce areas of green open space.</p> <p>Incorporate measures to protect and enhance the biodiversity value of the sites.</p>
<p>Natural/built environment</p> <p>Protect and enhance the built environment and the countryside</p>	<p>Minor beneficial</p>	<p>The impact of the Southborough Hub is uncertain as it has potential to enhance the townscape in this prominent town centre site but may lead to some loss of green open space. Policy CP5 requires that developments will be of high-quality design and conserve and enhance the public realm. The impacts would be permanent.</p>	<p>Any development along the A26 should seek to enhance the townscape and character of this important access route and of Southborough town centre.</p> <p>Where possible conserve or enhance trees and hedgerows on site, particularly those designated for landscape value and retain/introduce areas of green open space.</p> <p>All development should be required to conserve/enhance local character and distinctiveness.</p>
<p>Transport</p> <p>Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion</p>	<p>Uncertain impact.</p>	<p>The Southborough Hub has the potential to provide employment, housing, shops and services in accessible locations within the LBD which should have a beneficial impact on this objective by allowing good non-car access to facilities. New development may increase traffic movements on the congested A26 which is a particular issue in the AQMA and buffer zone, but the Southborough Hub was previously developed with a range of uses, so the net increase in traffic is likely to be low. Policies CP10 and CP3 should ensure that sustainable transport is promoted. It is uncertain whether redevelopment of the Southborough Hub would result in a loss of car parking serving local shops.</p>	<p>Site layouts should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle.</p> <p>The impact on local businesses of any loss of car parking in Yew Tree Road should be considered and alternative provision made if appropriate.</p> <p>Require that new development should not significantly increase traffic movements on the A26 and local roads.</p>
<p>Waste</p>	<p>No significant</p>	<p>Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Reduce the impact of resource consumption and reduce waste generation and disposal			
Energy Increase energy efficiency and the proportion of energy generated from renewable resources	No significant impact.	Mixed use development at the Southborough Hub may lend itself to renewable energy provision. Core Policy 5 requires that all new development must implement the South East Plan renewable energy and energy efficiency targets.	None proposed
Employment Facilitate and support a diverse employment base and economic growth	Minor beneficial	The cumulative impact on this objective depends on the precise mix of uses achieved on the allocated sites. There will be temporary beneficial impacts on employment during the construction phase on allocated sites.	None proposed

Paddock Wood

Sustainability Appraisal of Sites

7.11 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Paddock Wood are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, amendments have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Appraisal

7.12 The cumulative appraisal relates only to sites allocated in the Submission Draft DPD. The sustainability appraisals for policies relating to Paddock Wood are summarised in Table 24 below. The bottom row gives the predicted cumulative impact of the policies according to the methodology set out in Section 3.

7.13 The table indicates that a significant beneficial impact is predicted in relation to housing need and employment. Minor beneficial impacts are predicted in relation to social inclusion, service provision and transport objectives. A minor adverse impact is anticipated for efficient use of land and natural/built environment. These impacts are discussed in more detail in the commentary Table 25 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce or remove adverse effects. In the preparation of the earlier consultation draft, the Council responded to these suggestions (see Appendix 4) and included them in the development parameters of the individual site allocations where appropriate.

7.14 In terms of timescales, there is no formal phasing of development. A comprehensive masterplan is to be prepared for the residential developments at Church Farm/Mascalls Court Road and Mascalls Farm. Given the need for a masterplan approach and the provision of new road and flood prevention infrastructure, it is anticipated that the full cumulative impacts would not occur until the long-term.

Table 24 Paddock Wood – Summary of Policies together with Cumulative Impact

DPD Policy		Sustainability Objective														
Ref	Name	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient land use	Pollution	Water/Flood Risk	Bio-diversity	Natural/Built Environment	Transport	Waste	Energy	Employment
AL/STR1	Limits to Built Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/STR3	Safeguarding Former Railway Lines	0	+	+	0	+	0	+	+	+	+	+	+	0	0	0
AL/PW1	Commercial Road West Car Park, Commercial Road/Station Road	0	0	-	0	0	-	?	0	--	0	0	?	0	0	+
AL/PW1	Land off Station Road/Commercial Road	+	0	0	0	0	?	+	0	-	?	+	+	0	0	?
AL/PW2	Wesley Centre, Commercial Road/Old Kent Road TN12 6DS	0	+	+	+	0	+	+	0	-	0	0	+	0	0	+
AL/PW3	Land at Church Farm, Church Road TN12 6HS	+	?	+	0	0	+	--	-	--	-	--	+	0	?	0
AL/PW3	Land off Mascalls Court Rd	++	?	?	+	0	+	--	0	-	-	-	+	0	0	+
AL/PW4	Land at Mascalls Farm, Badsell Road	+	0	0	0	0	+	--	-	-	--	--	?	0	0	?
AL/PW5	Transfesa Road East and West and Eldon Way Key Employment Areas	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/PW6	Town Centre Boundary and PSA	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/PW7	Land off Nursery Road	0	?	?	0	0	+	0	0	0	+	+	0	0	0	0
AL/PW8	Land off Green Lane	0	+	0	0	0	+	+	+	+	+	+	0	0	0	0
Cumulative Impact		++	?	+	?	0	+	-	?	?	?	-	+	0	0	++

Table 25 Paddock Wood - Commentary on Cumulative Impact of DPD Policies

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Housing need</p> <p>Provide sufficient housing to meet identified needs, including affordable housing</p>	<p>Significant beneficial impact.</p>	<p>These allocations have the potential to provide approximately 950 new homes on the residential sites (Policies AL/PW3 and AL/PW4) together with some residential accommodation on the mixed use site (Policy AL/PW1). This meets the new development required in Paddock Wood in the Core Strategy paragraph 5.140 with sufficient land for further development beyond the Plan period. Core Strategy Policy CP6 requires that residential development incorporates affordable housing and a mix of dwelling types and sizes according to local needs. CP5 and Building Regulations require new development to be of sustainable design and construction. The timescale for these benefits is dependant on the rate at which development comes forward but due to flooding and infrastructure requirements, is likely to be in the medium/long term. The impact will be permanent or until such time as housing demand again exceeds supply.</p>	<p>None proposed</p>
<p>Health</p> <p>Improve health and reduce health inequalities</p>	<p>Uncertain</p>	<p>The greenfield allocations may have an adverse impact on opportunities for informal recreation. However, Policy CP5 should ensure that new development is safe and of high quality and Policy CP8 that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. The Wesley Centre (Policy AL/PW2) and the residential allocations (Policies AL/PW3 and AL/PW4) have the potential to incorporate or contribute to new community facilities. In the short/medium term there will be temporary adverse impacts associated with construction noise and traffic.</p>	<p>Any site masterplans should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit health objectives through promoting walking, cycling and general well-being.</p> <p>Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments.</p> <p>Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Social Inclusion</p> <p>Reduce poverty and increase social inclusion</p>	<p>Minor beneficial</p>	<p>These allocations should improve access to affordable housing as policies CP6 and CP11 require that new residential development incorporates affordable housing and creates a mix of housing types and tenures. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. Policy AL/PW1 has the potential to incorporate new facilities in an accessible location and provides the opportunity for a convenience store increasing the range of choice in convenience goods which may benefit lower income groups. These effects would be permanent. Long term effects may be reduced if demand for affordable housing increases.</p>	<p>Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit social inclusion through promoting walking and cycling networks and access to green open space.</p>
<p>Education</p> <p>Improve educational attainment and enhance the skills base</p>	<p>Uncertain</p>	<p>The primary school allocated in Policy AL/PW3 will benefit education objectives and the general policies AL/STR1-2 may enhance access to education.</p>	<p>None proposed</p>
<p>Crime</p> <p>Reduce crime and the fear of crime</p>	<p>No significant impact</p>	<p>Policy CP5 requires new development to create safe environments, but crime is unlikely to be an issue currently on the greenfield sites. Some possible permanent benefit may result from the redevelopment of derelict land under Policy AL/PW1.</p>	<p>None proposed</p>
<p>Service provision</p> <p>Improve quality, range and accessibility to all services and facilities</p>	<p>Minor beneficial</p>	<p>The greenfield allocations may have an adverse impact on informal recreation in the countryside. However, Policy CP8 should ensure that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. Policies AL/PW2, AL/PW3, AL/PW4 have the potential to incorporate new community facilities and/or local employment opportunities. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. Any impacts would be permanent.</p>	<p>Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. Policies AL/PW3 and AL/PW4 on the eastern and southern edge of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which improve pedestrian and bicycle access to local facilities and provide accessible green open space.</p>
<p>Efficient land use</p>	<p>Minor adverse</p>	<p>The effect of allocating greenfield sites outside the LBD represents a loss of previously undeveloped agricultural land including Grade 3a.</p>	<p>Seek efficient use of land within the greenfield sites to retain green open space particularly that with</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance</p>		<p>Mascalls Farm adjoins a Local Nature Reserve and incorporates a local wildlife site and ancient woodland. Policies AL/PW1 and AL/PW2 however involve the redevelopment of town centre land some of which is currently derelict and should contribute to urban renaissance.</p>	<p>landscape, biodiversity, natural drainage or heritage value.</p>
<p>Pollution Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>	<p>Uncertain</p>	<p>New housing and employment development on greenfield land is likely to reduce vegetation which acts as a carbon sink. In addition, new development on this scale is likely to generate traffic movements which will contribute to air pollution. Temporary negative effects may occur during construction. However, any pollution should be minimised by policies CP11, CP3 and CP5 of the Core Strategy, by Building Regulations and Environmental Protection Legislation.</p>	<p>Temporary negative effects during the construction phase should be minimised by appropriate planning conditions.</p> <p>Retaining green open space, trees and hedges and requiring structural landscaping will retain some function as carbon sink, thereby reducing carbon dioxide emissions. Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could improve air quality and green house gas emissions.</p>
<p>Water/flood risk Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	<p>Uncertain</p>	<p>New housing and employment development on greenfield land will reduce natural drainage and water storage which has the potential to reduce water reaching the water table and to increase the risk of flooding. All the allocated sites lie partially or completely within flood zones. New development will also increase demand for water. However, Policy CP5 seeks to reduce adverse impacts. Church Farm and Mascalls Farm (Policies AL/PW3 and AL/PW4) have surface water features within or adjoining the site which might be adversely affected by development. The adverse impacts could be significantly reduced if the developments incorporated flood prevention and measures to increase sustainability that would benefit the wider settlement. The impacts would be permanent.</p>	<p>Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain natural drainage</p> <p>Ensure that quality of surface water features such as ponds and streams is maintained</p> <p>Require development to incorporate flood prevention and measures to increase sustainability for both the site and wider settlement area.</p> <p>Ensure the layout and location of development within the greenfield sites takes into account natural drainage, biodiversity and landscape value of low lying areas and water features.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
			<p>Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which should benefit natural drainage and reduce flood risk.</p>
<p>Biodiversity Conserve and enhance biodiversity</p>	<p>Uncertain</p>	<p>None of the proposed sites are designated for biodiversity value except AL/PW4 part of which is a local wildlife site and ancient woodland. This site also adjoins Folehurst Wood, a Local Nature Reserve with ancient woodland. The policy states that buffer zones will be provided to protect these habitats. However, the development of greenfield sites will impact on biodiversity. The sites comprise a variety of habitats including woodland, hedges, arable land, fresh water and orchards. Policy CP4 seeks to ensure no net loss of biodiversity across the borough.</p>	<p>Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space</p> <p>Incorporate measures to protect and enhance biodiversity value of the sites.</p> <p>Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit biodiversity by providing linked, linear habitats.</p>
<p>Natural/built environment Protect and enhance the built environment and the countryside</p>	<p>Minor adverse</p>	<p>The greenfield sites will have an impact on the countryside by extending the eastern and southern edges of the town. However, Policies AL/PW1 and AL/PW2 have the potential to enhance the built environment by redeveloping previously developed land. Policy CP5 requires that developments will be of high quality design and conserve and enhance the public realm. The impacts would be permanent.</p>	<p>Any site masterplans should seek to enhance the eastern and southern edges and landscape setting of Paddock Wood.</p> <p>Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit the quality of the townscape.</p> <p>All development should be required to conserve/enhance local character and distinctiveness.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Transport</p> <p>Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion</p>	<p>Minor beneficial</p>	<p>Policy AL/PW1 has the potential to provide residential accommodation, shops and services in an accessible town centre location. It should provide local employment opportunities, thus reducing the need to travel. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. However, new development on this scale is likely to generate traffic movements which may cause local congestion. Policy CP11 and CP3 should ensure that sustainable transport is promoted.</p>	<p>Any site masterplans should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle and require a Transport Assessment where appropriate.</p> <p>Policies AL/PW3 and AL/PW4 on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could promote walking, cycling and access to local services.</p>
<p>Waste</p> <p>Reduce the impact of resource consumption and reduce waste generation and disposal</p>	<p>No significant impact</p>	<p>Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.</p>	<p>None proposed</p>
<p>Energy</p> <p>Increase energy efficiency and the proportion of energy generated from renewable resources</p>	<p>No significant impact</p>	<p>Residential and employment development on previously undeveloped sites will generate an increase in energy use but Core Policy 5 requires that all new development must implement the South East Plan renewable energy and energy efficiency targets.</p>	<p>None proposed</p>
<p>Employment</p>	<p>Significant beneficial</p>	<p>Residential development should help to support the local economy and the vitality and viability of the town centre. Policy AL/PW1 and the</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Facilitate and support a diverse employment base and economic growth		proposed primary school under Policy AL/PW3 could create additional local employment. There will be temporary beneficial impacts on employment during the construction phase on allocated sites.	

Cranbrook

Sustainability Appraisal

7.15 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Cranbrook are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, amendments have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Appraisal

7.16 The cumulative impact appraisal relates only to sites allocated in the Submission Draft DPD. The sustainability appraisals for policies relating to Cranbrook are summarised in Table 26 below. The bottom row gives the predicted cumulative impact of the policies according to the methodology set out in Section 3.

7.17 The table indicates that a significant beneficial impact is predicted in relation to housing need. Minor beneficial impacts are expected for service provision and employment. A minor adverse impact is predicted for efficient use of land. These impacts are discussed in more detail in the commentary Table 27 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce or remove adverse effects. In the preparation of the earlier consultation draft, the Council responded to these suggestions (see Appendix 4) and included them in the development parameters of the individual site allocations where appropriate.

7.18 In terms of timescales, there is no formal phasing of development in the allocations document. However, the majority of development within Cranbrook is planned to come from site allocations to the south of the town. A comprehensive masterplan will be prepared to preserve and enhance the setting of the town and Conservation Area in line with Core Policy 12: Development in Cranbrook. Given the need for a masterplan approach and the provision of new road infrastructure, it is anticipated that development is likely to be towards the middle of the Plan period. Therefore it is anticipated that the full cumulative impacts would not occur until the medium or longer term.

Table 26 Cranbrook – Summary of Policies together with Cumulative Impact

Ref	DPD Policy		Sustainability Objective													
	Name	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient land use	Pollution	Water/Flood Risk	Bio-diversity	Natural/Built Environment	Transport	Waste	Energy	Employment
AL/STR1	Limits to Built Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/CR1	Police Station, Wheatfield Drive	+	?	-	0	-	-	+	0	0	0	0	+	0	0	-
AL/CR2	Cranbrook Library	+	-	-	0	0	0	?	0	0	-	-	?	0	0	0
AL/CR3	The Vicarage, Waterloo Road	+	0	?	0	0	?	?	0	?	?	?	+	0	0	0
	Land adjacent to the Crane Valley, south of the High Street	+	?	?	-	0	+	--	0	-	--	--	?	0	?	0
AL/CR4	Land adjacent to the Crane Valley, south of High Street and east of Orchard Way	+	?	?	-	0	+	--	0	-	--	--	?	0	?	0
AL/CR5	Land off Stone Street and High Street	+	0	+	0	+	+	+	?	-	?	-	+	0	0	?
AL/CR6	Wilkes Field, Rear of High Street/Stone Street	?	+	+	+	0	+	-	0	-	-	-	?	0	0	0
AL/CR7	Town Centre Boundary and PSA	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
	Cumulative Impact	++	?	?	?	?	+	-	?	?	?	?	?	0	?	+

Table 27 Cranbrook - Commentary on Cumulative Impact of DPD Policies

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Housing need Provide sufficient housing to meet identified needs, including affordable housing</p>	<p>Strongly beneficial</p>	<p>All the allocations should contribute to housing provision for Cranbrook. The allocations have the potential to provide approximately 280 new homes on the residential sites, meeting the new development required in Cranbrook in the Core Strategy paragraph 5.140 and Policy CP12. Core Strategy policy CP6 requires that residential development incorporates affordable housing and a mix of dwelling types and sizes according to local needs. CP5 and Building Regulations require new development to be of sustainable design and construction. The timescale for these benefits is dependant on the rate at which development comes forward but may occur in the short/medium or long term. All sites are currently available for development but the allocations in and around the Crane Valley are likely to be implemented in a phased process. The impact will be permanent or until such time as housing demand again exceeds supply.</p>	<p>None proposed</p>
<p>Health Improve health and reduce health inequalities</p>	<p>Uncertain impact</p>	<p>The greenfield allocations may have an adverse impact on opportunities for informal recreation. Also additional housing is likely to generate additional traffic and congestion on local roads and in the town centre which could reduce air quality and impact on quality of life. However, Policy CP5 should ensure that new development is safe and of high quality and Policy CP8 that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. Policy AL/CR5 (Wilkes Field) allocates land for a community hub which could include sports facilities. In the short/medium term there will be temporary adverse impacts associated with construction noise and traffic.</p>	<p>Any site masterplans should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. The coordinated development of Sites adjacent to the Crane Valley (Policy AL/CR3) offers the possibility of incorporating a network of interconnected green open spaces suitable for informal recreation and formal recreation and play space which could benefit health objectives through promoting walking, cycling and general well-being and by helping to maintain air quality.</p> <p>Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments.</p> <p>Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Social Inclusion Reduce poverty and increase social inclusion</p>	<p>Uncertain</p>	<p>The greenfield allocations will have an adverse impact on access to the countryside, developing some accessible areas which are currently used for informal recreation. However, these allocations should improve access to affordable housing as Policies CP6 and CP12 require that new residential development incorporates affordable housing and creates a mix of housing types and tenures. The sites are all edge of settlement or within the settlement allowing moderate or good non-car access to facilities and to the open countryside. Policy AL/CR6 (Wilkes Field) has the potential to provide new community facilities in an accessible location. Policy AL/CR5 (The Post Office Delivery Depot and Land at Stone Street) may create opportunities for local employment. The coordinated development of sites in the Crane Valley (Policy AL/CR4) offers the possibility of incorporating a network of interconnected green open spaces suitable for informal recreation and formal recreation and play space which could benefit residents on lower incomes. These effects would be permanent and could occur in the short/medium term depending on when development comes forward. Long term effects may be reduced if demand for affordable housing increases.</p>	<p>Ensure that the masterplan for Policy AL/CR4 (adjacent to the Crane Valley) maximises the provision of publicly accessible informal and formal recreation open space including play space.</p>
<p>Education Improve educational attainment and enhance the skills base</p>	<p>Uncertain</p>	<p>The large number of homes being allocated at the Crane Valley site are likely to create additional pressure on local schools but the general policies AL/STR1-2 may enhance access to education.</p>	<p>None proposed</p>
<p>Crime Reduce crime and the fear of crime</p>	<p>Uncertain</p>	<p>Policy CP5 requires new development to create safe environments.</p>	<p>None proposed</p>
<p>Service provision</p>	<p>Minor beneficial</p>	<p>The greenfield allocations may have an adverse impact on informal recreation in the countryside. However, Policy CP8 should ensure that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. Policy AL/CR6</p>	<p>Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Improve quality, range and accessibility to all services and facilities</p>		<p>(Wilkes Field) has the potential to incorporate new community facilities. Policy AL/CR5 has the potential to provide local employment opportunities. The sites are all edge of or within the settlement allowing moderate or good non-car access to facilities and to the open countryside. Any impacts would be permanent.</p>	<p>Ensure that the masterplan for Policy AL/CR4 (adjoining the Crane Valley) requires a comprehensive network of foot and cycle paths within the development and connecting to the town centre.</p>
<p>Efficient land use Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance</p>	<p>Minor adverse impact</p>	<p>The cumulative effect of allocating greenfield sites predominantly outside the LBD represents a significant loss of previously undeveloped agricultural land which has landscape (AONB) and biodiversity value. Policies AL/CR1 and AL/CR5 however involve the redevelopment of previously developed land within the LBD and should contribute to urban renaissance.</p>	<p>Seek efficient use of land within the greenfield sites to retain a network of green open space particularly that with landscape, biodiversity, natural drainage or heritage value.</p>
<p>Pollution Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>	<p>Uncertain</p>	<p>New housing development on greenfield land is likely to reduce vegetation which acts as a carbon sink and promotes air quality. In addition, new development on this scale is likely to generate traffic movements which will contribute to air pollution. Temporary negative effects may occur during construction. However, any pollution should be minimised by policies CP11, CP3 and CP5 of the Core Strategy, by Building Regulations and Environmental Protection Legislation. In addition the sites are located close to the town centre, which encourages travel by foot and bicycle.</p>	<p>Temporary negative effects during the construction phase should be minimised by appropriate planning conditions.</p> <p>Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality.</p> <p>Ensure that the masterplan for Policy AL/CR4 (adjoining the Crane Valley) requires a network of green open spaces.</p> <p>Ensure that the water quality of the Crane River and other streams and ponds is protected and/or enhanced.</p> <p>Seek to minimise congestion on local roads arising from the developments.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Water/flood risk</p> <p>Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	<p>Uncertain</p>	<p>New housing development on greenfield land will reduce natural drainage and water storage which has the potential to reduce water reaching the water table and to increase the risk of flooding. However, Policy CP5 seeks to reduce adverse impacts. Sites covered by Policies AL/CR4, AL/CR5 and AL/CR6 should be designed to avoid any potential flooding issues and to ensure the protection of surface water features within or adjoining the sites. The impacts would be permanent.</p>	<p>Sustainable sustainable drainage systems (SuDS) and soft landscaping should be required to maintain natural drainage</p> <p>Ensure that quality of surface water features such as ponds and streams is maintained</p> <p>Require development on sites covered by AL/CR4, AL/CR5 and AL/CR6 to incorporate any necessary flood prevention and measures to increase sustainability.</p> <p>Ensure the layout and location of development within the greenfield sites takes into account natural drainage, biodiversity and landscape value of water features.</p> <p>The coordinated development of sites adjoining the Crane Valley (Policy AL/CR4) offers the possibility of incorporating a network of interconnected green open spaces which could benefit natural drainage and reduce flood risk.</p>
<p>Biodiversity</p> <p>Conserve and enhance biodiversity</p>	<p>Uncertain</p>	<p>The development of sites on the western edge of Cranbrook could potentially have an adverse impact on the biodiversity value of the Crane Valley. The allocation abuts a Local Wildlife Site. Whilst, none of the allocated sites are themselves designated for biodiversity value, the development of greenfield sites is likely to have an adverse impact on biodiversity. The sites comprise a variety of habitats including woodland (some ancient), hedges, scrub, pasture land, fresh water and orchards. Policy CP4 seeks to ensure no net loss of biodiversity across the borough. The redevelopment of previously developed sites is unlikely to have a significant impact on biodiversity, provided that trees are protected where possible.</p>	<p>Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space.</p> <p>Incorporate measures to protect and enhance biodiversity value of the sites, particularly in the Crane Valley.</p> <p>The coordinated development of land adjoining sites in the Crane Valley (Policy AL/CR4) offers the possibility of incorporating a network of interconnected green open spaces which could benefit biodiversity by providing linked habitats.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Natural/built environment</p> <p>Protect and enhance the built environment and the countryside</p>	<p>Uncertain</p>	<p>The greenfield sites will have a significant cumulative impact on the countryside within the AONB. However, Policy AL/CR1 has the potential to enhance the built environment by redeveloping buildings of no particular architectural merit. All the sites are located within or close to the Cranbrook Conservation Area and/or affect the setting of a listed building. In addition, Policy AL/CR6 (Wilkes Field) lies within an Area of Archaeological potential. Policy CP5 requires that developments will be of high-quality design and conserve and enhance the public realm. Policy CP12 requires new development to have particular regard to preserving and enhancing the Conservation Area and landscape setting within the AONB. The impacts would be permanent.</p>	<p>Any site masterplans should seek to enhance the western edge and landscape setting of Cranbrook and to preserve or enhance the AONB.</p> <p>Any development should maintain or enhance the setting of the Cranbrook Conservation Area and listed buildings</p> <p>The coordinated development of sites adjoining the Crane Valley (Policy AL/CR4) offers the possibility of incorporating a network of interconnected green open spaces which could benefit the quality of the townscape.</p>
<p>Transport</p> <p>Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion</p>	<p>Uncertain impact.</p>	<p>Policies AL/CR4, AL/CR5 and AL/CR6 have the potential to provide employment, housing, shops and services in accessible locations within the LBD. Policy AL/CR5 should provide local employment opportunities, thus reducing the need to travel. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. However new development on this scale is likely to generate traffic movements which may cause local congestion. Policies CP11 and CP3 should ensure that sustainable transport is promoted.</p>	<p>Any site masterplans should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle.</p> <p>The coordinated development of land adjoining the Crane Valley offers the possibility of incorporating a network of roads, footpaths and cycle ways which would promote walking, cycling and access to local services and minimise local traffic congestion.</p>
<p>Waste</p> <p>Reduce the impact of resource consumption and reduce waste generation and disposal</p>	<p>No significant impact</p>	<p>Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.</p>	<p>None proposed</p>
<p>Energy</p>	<p>Uncertain</p>	<p>Residential development on previously undeveloped sites will generate an increase in energy use but Core Policy 5 requires that all new</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Increase energy efficiency and the proportion of energy generated from renewable resources</p>		<p>development must implement the South East Plan renewable energy and energy efficiency targets.</p>	
<p>Employment Facilitate and support a diverse employment base and economic growth</p>	<p>Minor beneficial</p>	<p>Residential development should help to support the local economy and the vitality and viability of the town centre. Mixed use sites may create additional local employment. There will be temporary beneficial impacts on employment during the construction phase on allocated sites.</p>	<p>None proposed</p>

Hawkhurst

Sustainability Appraisal

7.19 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Hawkhurst, The Moor and Gill's Green are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, amendments have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Appraisal

7.20 The cumulative impact appraisal relates only to sites allocated in the Submission Draft DPD. The sustainability appraisals for policies relating to Hawkhurst are summarised in Table 28 below. The bottom row gives the predicted cumulative impact of the policies according to the methodology set out in Section 3.

7.21 The table indicates that significant beneficial impacts are expected in relation to social inclusion. Minor beneficial impacts are predicted for housing need, service provision, efficient use of land, natural/built environment, transport and employment. No cumulative adverse impacts are predicted. All other impacts are expected to be not significant or uncertain. These impacts are discussed in more detail in the commentary Table 29 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce or remove adverse effects. In the preparation of the consultation draft, the Council responded to these suggestions (see Appendix 7) and included them in the development parameters of the individual site allocations where appropriate.

7.22 In terms of timescales, there is no formal phasing of development in the DPD. Development in Hawkhurst will be delivered from a number of sites within and adjoining the settlement. It is anticipated that sites will be delivered over the early and middle of the Plan period. Accordingly, the full cumulative impacts would be unlikely to occur until the medium to term.

Table 28 Hawkhurst – Summary of Policies together with Cumulative Impact

Ref	DPD Policy		Sustainability Objective													
	Name	Housing need	Health	Social Inclusion	Education	Crime	Service provision	Efficient land use	Pollution	Water/Flood Risk	Bio-diversity	Natural/Built Environment	Transport	Waste	Energy	Employment
AL/STR1	Limits to Built Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/STR3	Safeguarding Former Railway Lines	0	+	+	0	+	0	+	+	+	+	+	+	0	0	0
AL/HA1	Springfield Garden Centre	+	0	0	0	0	-	+	0	0	-	-	+	0	0	-
AL/HA2	Land at Woodham Hall, Rye Road	+	?	?	0	0	?	?	0	0	-	-	+	0	0	0
AL/HA3	Hawkhurst Castle	?	?	?	0	0	?	+	0	0	?	+	+	0	0	?
AL/HA4	Birchfield, Rye Road	+	0	+	?	0	+	-	0	0	-	--	+	0	0	0
AL/HA5	King George V Playing Fields, The Moor	0	?	+	0	0	+	+	0	0	?	0	+	0	0	0
AL/HA6	Gill's Green Key Employment Area	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/HA7	Hawkhurst Town Centre Boundary and PSA	0	0	0	0	0	+	+	?	?	?	+	?	0	0	+
AL/HA8	Gunther Close	0	+	+	0	0	+	+	?	+	+	+	0	0	0	0
Cumulative impact		+	?	+	?	0	+	++	?	?	?	+	+	0	0	+

Table 29 Hawkhurst - Commentary on Cumulative Impact of DPD Policies

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Housing need</p> <p>Provide sufficient housing to meet identified needs, including affordable housing</p>	<p>Minor beneficial</p>	<p>These allocations have the potential to provide up to 116 new homes on the residential sites, meeting the new development required in Hawkhurst in the Core Strategy Policy CP13. Core Strategy policy CP6 requires that residential development incorporates affordable housing and a mix of dwelling types and sizes according to local needs. Policy CP5 and Building Regulations require new development to be of sustainable design and construction. Policy CP13 indicates that developments of 10 or more dwellings in Hawkhurst will be required to provide affordable housing. The timescale for these benefits is dependent on the rate at which development comes forward but may occur in the short/medium or longer term. The impact will be permanent or until such time as housing demand again exceeds supply.</p>	<p>None proposed</p>
<p>Health</p> <p>Improve health and reduce health inequalities</p>	<p>Uncertain</p>	<p>The greenfield allocation may have an adverse impact on opportunities for informal recreation. However, Policy CP5 should ensure that new development is safe and of high quality and Policy CP8 that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. In the short/medium term there will be temporary adverse impacts associated with construction noise and traffic. All the sites are located within or on the edge of settlements within walking distance of services which should encourage an active lifestyle, except for Hawkhurst Castle which is in the countryside.</p>	<p>Any site proposals should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle.</p> <p>Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments.</p> <p>Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions.</p>
<p>Social Inclusion</p> <p>Reduce poverty and increase social inclusion</p>	<p>Minor Beneficial</p>	<p>These allocations should improve access to affordable housing as policies CP6 and CP13 require that new residential development incorporates affordable housing and creates a mix of housing types and tenures. The majority of sites are edge of settlement allowing moderate or good non-car access to facilities and to the open countryside. New community facilities at King George V Playing Fields should promote social inclusion. However, Hawkhurst Castle and Springfield Garden Centre are located</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
		at some distance from local shops and services, not within easy walking distance. These effects would be permanent and could occur in the medium term depending on when development comes forward. Long term effects may be reduced if demand for affordable housing increases.	
Education Improve educational attainment and enhance the skills base	Uncertain	None of the allocated sites are for education facilities. Residential development allocated at Birchfield could impact upon the existing adjacent primary school and the general policies AL/STR1-2 may enhance access to education.	None proposed
Crime Reduce crime and the fear of crime	No significant impact	Policy CP5 requires new development to create safe environments, but crime is unlikely to be an issue currently on the greenfield site. Some possible permanent benefit may result from the redevelopment of currently vacant, partially derelict site 362.	None proposed
Service provision Improve quality, range and accessibility to all services and facilities	Minor beneficial	The greenfield allocation may have an adverse impact on informal recreation in the countryside. However, new community facilities at King George V Playing Fields should enhance the quality and variety of service provision. Policy CP8 should ensure that recreational, open space, cultural and community facilities will be provided to meet any additional demand created by the proposals. The majority of sites are edge of settlement allowing moderate or good non-car access to facilities and to the open countryside. However, Hawkhurst Castle is not well located in relation to the town centre. Any impacts would be permanent. The construction of new housing should support the viability of services and facilities in Hawkhurst.	Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside.
Efficient land use Improve efficiency in land use through the reuse of previously	Significant beneficial	Policy AL/HA4 relates to predominantly greenfield land adjoining the edge of the town. Hawkhurst Castle lies outside the LBD but the former children's/care home is now vacant and derelict. Allocation of this site provides an opportunity to reuse this building and refurbish the site. It is anticipated that the development of Hawkhurst Castle would have a beneficial impact on improving efficiency of land use.	Seek efficient use of land within the greenfield site to retain green open space particularly that with landscape, biodiversity, natural drainage or heritage value.

Objective	Impact	Comments	Measures to Increase Sustainability
developed land and encourage urban renaissance			
<p>Pollution</p> <p>Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>	Uncertain	<p>New housing development on greenfield land is likely to reduce vegetation which acts as a carbon sink. In addition, new development on this scale is likely to generate traffic movements which will contribute to air pollution. Temporary negative effects may occur during construction. However, any pollution should be minimised by policies CP11, CP3 and CP5 of the Core Strategy, by Building Regulations and Environmental Protection Legislation. In addition, with the exception of Hawkhurst Castle the allocations are all within or adjoining the built up area providing opportunities for walking and cycling. Redevelopment of Hawkhurst Castle provides opportunities for the reuse of the building and recycling of materials.</p>	<p>Temporary negative effects during the construction phase should be minimised by appropriate planning conditions.</p> <p>Retaining green open space, trees and hedges and requiring structural landscaping will retain some function as carbon sink, thereby reducing carbon dioxide emissions.</p>
<p>Water/flood risk</p> <p>Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	Uncertain	<p>New housing and employment development on greenfield land will reduce natural drainage and water storage which has the potential to reduce water reaching the water table. New development will also increase demand for water. None of the sites are identified in the Strategic Flood Risk Assessment 2007 as being at risk of flooding. Policy CP5 should ensure efficient use of water resources and protection of the water quality.</p>	<p>Sustainable Drainage Systems (SuDS) and soft landscaping should be required to maintain natural drainage.</p> <p>Ensure that quality of surface water features such as ponds and streams is maintained.</p>
<p>Biodiversity</p> <p>Conserve and enhance biodiversity</p>	Uncertain	<p>None of the allocated sites are designated for biodiversity value. However, the development of the greenfield site will impact on biodiversity. Likewise, the previously developed land at Hawkhurst Castle incorporates significant mature woodland and specimen trees which are of biodiversity value. Policy CP4 seeks to ensure no net loss of biodiversity across the borough. The impacts would be permanent.</p>	<p>Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space.</p> <p>Incorporate measures to protect and enhance biodiversity value of the sites.</p>
<p>Natural/built environment</p>	Minor beneficial	<p>The greenfield site will have an impact on the countryside within the AONB. However, Hawkhurst Castle has the potential to enhance the built environment by reusing a derelict building in a prominent road side</p>	<p>Any site masterplans should seek to enhance the rural/urban edge and landscape setting of Hawkhurst and to protect the character of the AONB.</p>

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Protect and enhance the built environment and the countryside</p>		<p>position. Policy CP5 requires that developments will be of high-quality design and conserve and enhance the public realm. Policy CP13 requires all new development to conserve and enhance the setting of the town within the High Weald AONB. The impacts would be permanent.</p>	<p>Ensure that any development conserves and enhances the setting of Listed Buildings in the vicinity and the Hawkhurst Conservation Area. All development should be required to conserve/enhance local character and distinctiveness.</p>
<p>Transport Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion</p>	<p>Minor beneficial</p>	<p>With the exception of Hawkhurst Castle the sites are all edge of settlement allowing moderate or good non-car access to facilities and to the open countryside. However, new development on this scale is likely to generate traffic movements which may cause local congestion. Policy CP3 should ensure that sustainable transport is promoted.</p>	<p>Any site masterplans should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle.</p>
<p>Waste Reduce the impact of resource consumption and reduce waste generation and disposal</p>	<p>No significant impact</p>	<p>Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.</p>	<p>None proposed</p>
<p>Energy Increase energy efficiency and the proportion of energy generated from renewable resources</p>	<p>No significant impact</p>	<p>Residential and employment development on previously undeveloped sites will generate an increase in energy use but Core Policy 5 requires that all new development must implement the South East Plan renewable energy and energy efficiency targets.</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Employment Facilitate and support a diverse employment base and economic growth	Minor beneficial	New residential development should help to support the local economy and the vitality and viability of the town centre. There will be temporary beneficial impacts on employment during the construction phase on allocated sites. Policy AL/HA6 for Gill's Green Employment Area will have a positive impact upon employment provision.	None proposed

Villages and Rural Areas

Sustainability Appraisal

7.23 The sustainability appraisal matrices for all individual sites assessed by the Borough Council relating to Villages and Rural Areas are attached at Appendix 3 of the earlier Consultation Draft Sustainability Appraisal (March 2013). Following consultation, amendments have been made to some of these matrices and new matrices prepared to reflect changes made to policies in the Site Allocations DPD and to include new information. The amended sustainability appraisal matrices can be found in Appendix 2 (allocated sites) and Appendix 3 (unallocated sites) of this SA Report.

Cumulative Impact Appraisal

7.24 The sites allocated are generally dispersed around the borough. However, two sites are allocated within or adjoining the village of Pembury, so a cumulative analysis has been carried out for this settlement in Table 30 below. The bottom row gives the predicted cumulative impact of policies relating to Pembury according to the methodology set out in Section 3.

7.25 The table indicates that minor beneficial impacts are predicted in relation to health, social inclusion, education, service provision, efficient land use, pollution, water/flood risk, biodiversity, natural/built environment, transport and waste. A minor cumulative adverse impact is anticipated in relation to housing need. These impacts are discussed in more detail in the commentary Table 31 below and measures to increase sustainability are proposed to enhance beneficial impacts and reduce or remove adverse effects. In the preparation of the consultation draft, the Council has responded to these suggestions (see Appendix 7) and has included them in the development parameters of the individual site allocations where appropriate.

7.26 In terms of timescales, there is no formal phasing of development in the DPD. The sites are considered to be available and developable, so it is possible that they could come forward for development at any point during the plan period.

Table 30 Villages and Rural Areas (Pembury) – Summary of Policies together with Cumulative Impact

DPD Policy		Sustainability Objective														
Ref	Name	Housing need	Health	Social Inclusion	Edu-cation	Crime	Service provision	Efficient land use	Pol-lution	Water/ Flood Risk	Bio-diversity	Natural/ Built Environ-ment	Trans- port	Waste	Energy	Employ-ment
AL/STR1	Limits to Build Development	+	?	+	?	0	?	+	-	?	+	+	+	0	0	+
AL/STR2	Environmental and Recreation Designations	0	+	+	?	?	+	+	+	+	+	+	0	0	0	0
AL/VRA2	Land at Woodsgate Corner, adjacent to Tesco, Pembury	0	?	0	0	0	+	-	+	0	-	-	++	0	0	0
AL/VRA3	Land to the south of Sandhurst Avenue, Pembury	0	+	+	0	0	+	+	0	0	+	+	+	0	0	0
	Land to the east of Woodside Road, Pembury	0	+	+	0	0	+	+	0	+	+	+	0	0	0	0
Cumulative impact		-	+	+	?	?	+	+	+	+	+	+	+	0	0	0

Table 31 Pembury - Commentary on Cumulative Impact of DPD Policies

Objective	Impact	Comments	Measures to Increase Sustainability
Housing need Provide sufficient housing to meet identified needs, including affordable housing	Minor adverse	None of the sites are allocated for residential development.	None proposed
Health Improve health and reduce health inequalities	Minor beneficial	Policy AL/VRA3 allocates land for sports pitches and recreation which will have a beneficial impact on health.	None proposed
Social Inclusion Reduce poverty and increase social inclusion	Minor beneficial	Policies AL/VRA2 and AL/VRA3 should improve access to public transport and recreation open space.	None proposed
Education Improve educational attainment and enhance the skills base	Uncertain	The site allocations will have no significant impact but the general policies AL/STR1-2 may enhance access to education.	None proposed
Crime Reduce crime and the fear of crime	Uncertain	Policy CP5 requires new development to create safe environments.	None proposed

Objective	Impact	Comments	Measures to Increase Sustainability
<p>Service provision</p> <p>Improve quality, range and accessibility to all services and facilities</p>	<p>Minor beneficial</p>	<p>Policies AL/VRA2 and AL/VRA3 should improve access to public transport and recreation open space.</p>	<p>None proposed</p>
<p>Efficient land use</p> <p>Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance</p>	<p>Minor beneficial</p>	<p>Policy AL/VRA3 relates to land currently partially used as sports pitches. However, Policy AL/VRA2 lies outside the Limits to Built Development on an edge of settlement greenfield site within the AONB.</p>	<p>None proposed</p>
<p>Pollution</p> <p>Reduce pollution (to land, air and soil) and greenhouse gas emissions</p>	<p>Minor beneficial</p>	<p>Development Park and Ride should have a beneficial impact on air quality by reducing the number of car trips on this busy access route to Royal Tunbridge Wells, at a location convenient to the A21.</p>	<p>None proposed</p>
<p>Water/flood risk</p> <p>Protect and enhance water resources and manage flood risk and reduce the impacts of flooding</p>	<p>Minor beneficial</p>	<p>Allocation of land to the east of Woodside Road will assist in safeguarding the aquifer protection zone.</p>	<p>None proposed</p>

Objective	Impact	Comments	Measures to Increase Sustainability
Biodiversity Conserve and enhance biodiversity	Minor beneficial	Site 288 being a greenfield site outside the Limits to Built Development is likely to have an adverse impact, but the recreation allocations under Policy AL/VRA3 should retain the biodiversity value of these sites.	None proposed
Natural/built environment Protect and enhance the built environment and the countryside	Minor beneficial	The policies are expected to conserve the character of the natural and built environment with the exception of Policy AL/VRA2 which may have a minor adverse impact due to the loss of greenfield land forming part of the setting of Pembury.	None proposed
Transport Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion	Minor beneficial	Land is allocated for Park and Ride under Policy AL/VRA2 which should have a significant beneficial impact on improving transport choice and reducing car based travel on a congested section of road.	None proposed
Waste Reduce the impact of resource consumption and reduce waste generation and disposal	Minor beneficial	Core Policy CP5 requires that all new development be designed to minimise waste creation and disposal throughout the lifetime of the development. Building Regulations further seek to minimise waste.	None proposed

Objective	Impact	Comments	Measures to Increase Sustainability
Energy Increase energy efficiency and the proportion of energy generated from renewable resources	No significant impact	Residential development on previously undeveloped sites will generate an increase in energy use but Core Policy 5 requires that all new development must implement the South East Plan renewable energy and energy efficiency targets.	None proposed
Employment Facilitate and support a diverse employment base and economic growth	No significant impact	As no commercial or retail units are allocated, the policies will not have a direct impact upon employment.	None proposed

Section 8: Conclusions

Significant Impacts of the Site Allocations DPD

8.1 The policies in the Submission Draft Site Allocations DPD have been subject to detailed appraisal against the SA Objectives that were developed at the scoping stage of the SA process. In general, it is considered there will be a range of beneficial and significant beneficial impacts associated with the development of the sites. However, a number of potentially minor adverse and significant adverse impacts were also identified.

8.2 The significant beneficial and adverse impacts of policies in the DPD are discussed below together with mitigation measures which have been incorporated into the DPD.

Royal Tunbridge Wells

8.3 In relation to Royal Tunbridge Wells, Policies AL/RTW27 and AL/RTW28 are expected to have significant beneficial impacts on the employment objectives. Cumulatively, the policies relating to Royal Tunbridge Wells are expected to have significant beneficial impacts on housing need, social inclusion, crime, efficient use of land and transport objectives. In the absence of mitigation, a risk was identified that policies AL/RTW13 and AL/RTW14 could have significant adverse impacts on employment. However, Core Policy CP7 and the development conditions in the DPD should ensure that sufficient employment land is allocated to offset any potential loss of employment through the redevelopment of allocated sites. Cumulatively, no significant adverse effects were identified.

Southborough

8.4 The analysis of policies relating to Southborough indicates that Policy AL/SO4 is expected to have a significant beneficial impact on employment. No other significant beneficial or adverse impacts are anticipated. This is due to the relatively small number of policies and limited land area being allocated during this plan period.

Paddock Wood

8.5 In relation to Paddock Wood, Policies AL/PW3 and AL/PW4 are expected to have a significant beneficial impact on the housing need objective. Policy AL/PW5 should have a significant beneficial impact on employment. Cumulatively, the Paddock Wood policies are expected to have a significant beneficial impact on housing need and employment. In the absence of mitigation, a risk was identified of Policies AL/PW1 and AL/PW3 having a significant adverse impact on the water/flood risk objective. However, Core Policies CP3, CP4, CP5, CP8 and CP11 of the Core Strategy 2010, together with the forthcoming Local Flood Risk Management Strategy being prepared by Kent County Council, should address this risk. In addition, the policy requires that flood measures must seek to reduce problems in the wider settlement. This would create an overall improvement in the susceptibility of Paddock Wood to flooding. The allocations in Policies AL/PW3 and AL/PW4 are considered to have a significant adverse impact on the efficient use of land, the natural/built environment and, in the case of AL/PW4, on biodiversity, being on greenfield sites with some agricultural and wildlife value. However, this must be considered against the significant beneficial impact on meeting housing need and the lack of alternative sites within the built up area. No significant cumulative adverse impacts are anticipated.

Cranbrook

8.6 Policies affecting Cranbrook are expected to have a significant cumulative beneficial impact on housing need. However, a risk was identified that Policy AL/CR3 would have a significant adverse impact on objectives relating to efficient use of land, biodiversity and the natural/built environment as it represents a significant housing development on greenfield land outside the Limits to Built Development. Core Policies CP3, CP4, CP5 and CP8 of the Core Strategy 2010 should help to reduce negative impacts In

addition, the development conditions in the DPD set out a requirement for a master plan to be developed for Policy AL/CR3 incorporating requirements for green infrastructure including inter-connected green open spaces and landscape buffers with proposals for future management.

Hawkhurst, The Moor and Gill's Green

8.7 Policies relating to Hawkhurst are expected to have significant cumulative beneficial impact on efficient land use due to sites being located mostly within the LBD or on brownfield land. Policy AL/HA6 should have a significant beneficial impact on employment. The development conditions of the Submission Site Allocations DPD require that detailed landscape, visual impact assessment and ecological assessments be carried out and that a strong landscape framework and green infrastructure links be incorporated into any development. No significant cumulative adverse impacts are anticipated.

Villages and Rural Areas

8.8 Policies relating to Villages and Rural Areas are not expected to have any significant adverse impacts individually or cumulatively. Policy AL/VRA2 for Park and Ride at Pembury would have a significant beneficial impact on transport objectives in increasing transport choice and reducing the need to travel by car.

Monitoring

8.9 The SEA Directive requires that “*member states shall monitor the significant environmental effects of the implementation of plans or programmes... in order, inter alia, to identify at an early stage, unforeseen adverse effects, and be able to undertake appropriate remedial action*” (Article 10.1) and that the environmental report should provide information on “*a description of the measures envisaged concerning monitoring*” (Annex 1 (i)). Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

8.10 The government’s SA Guidance (hosted on the Planning Advisory Service website) states that it is not necessary to monitor everything. Instead, 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. The monitoring measures proposed in this SA Report therefore focus on the predicted significant effects only.

8.11 It is intended that the monitoring of the significant sustainability impacts of the Site Allocations DPD will be conducted as part of the overall monitoring of the impacts of the whole Local Plan.

8.12 Table 31 sets out a number of suggested indicators for monitoring the potential significant sustainability impacts of implementing the Site Allocations DPD, drawing on indicators that are also used for the Core Strategy monitoring where relevant. Note that the indicators proposed are included as suggestions at this stage.

8.13 In addition to quantitative indicators some qualitative monitoring is recommended, particularly in relation to retaining the quality of townscape and the natural environment. Qualitative data can be sourced from the High Weald Management Plan, Settlement Character Area Appraisals, Landscape Character Assessments and Conservation Area Appraisals.

Table 32 Proposed indicators to monitor the significant sustainability impacts of the DPD

SA objective		Relevant DPD Objectives	Proposed indicator	Source	Delivery Agency
1.	Provide sufficient housing to meet identified needs, including affordable housing	SO1, SO5	Housing completions by settlement	AMR Local Indicator H1	TWBC
			Current and historical average house prices	AMR Contextual Indicator H2	Land Registry
			Housing affordability	AMR Contextual Indicator H4	Office for National Statistics
			5 year supply housing land supply	AMR	TWBC
3.	Reduce poverty and increase social inclusion	SO7	Deprivation indices	AMR Contextual Indicator 4	Office for National Statistics
			Unemployment	AMR Contextual Indicator ED3	NOMIS
			Open space provision	AMR Local Indicator LS3	TWBC
5.	Crime	SO7	Level of crime	AMR Contextual Indicator 5	Home Office
7.	Improve efficiency in land use through the reuse of previously developed land and encourage urban renaissance	SO1-SO3, SD1-SD4	Percentage of all new development within Limits to Built Development	AMR Local Indicator CP1a	TWBC
			Percentage of all new development sites on previously developed land	AMR Local Indicator CP1b	TWBC
			Housing density	AMR Local Indicator H8	TWBC
8.	Reduce pollution (to land, air and soil) and greenhouse gas emissions.	SD3-SD5	Air quality in AQMA	AMR Local Indicator CP5a	TWBC
9.	Protect and enhance water resources and manage flood risk and reduce the impacts of flooding	SO7, SD3-SD5	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds	AMR Local Indicator E1	TWBC and Environment Agency

SA objective		Relevant DPD Objectives	Proposed indicator	Source	Delivery Agency
			Areas of flood risk	AMR Contextual Indicator SDC1	TWBC and Environment Agency
10.	Conserve and enhance biodiversity and geodiversity		Change in Areas of biodiversity Importance	AMR Local indicator E2	TWBC and Kent High Weald Partnership
			Implementation of Kent BAP and LBAP	AMR Local Indicator E1	TWBC and Kent High Weald Partnership
11.	Protect and enhance the natural and built environment and provide accessibility	SO1-SO6 SD1-SD5	Qualitative assessment of AONB	AONB Management Plan	High Weald Joint Advisory Committee
			Qualitative assessment of landscape character	Borough Landscape Character Assessment	TWBC
			Qualitative assessment of townscape character	Character Area Assessments	TWBC
			Qualitative assessment of special architectural or historic character of Conservation Areas	Character Area Appraisals and boundary reviews.	TWBC
			Retention of Green Belt	AMR Local Indicator CP2a	TWBC
			Maintenance of Long Term Land Reserve	AMR Local Indicator CP2b	TWBC
			Number of listed buildings at risk	To be added to AMR?	TWBC and English Heritage
			Design quality	AMR Local Indicator H6	TWBC
12.	Improve travel choice and to reduce the need for travel, particularly by car/lorry and to reduce road congestion	SO4	Journeys taken from Tunbridge Wells Railway Station	AMR Contextual Indicator TP2	Kent County Council
			Movement across outer and inner Royal Tunbridge Wells and Southborough cordons	AMR Contextual Indicator TP1	Kent County Council

SA objective		Relevant DPD Objectives	Proposed indicator	Source	Delivery Agency
			Progress on infrastructure projects (transport)	AMR Local Indicator CP3a	TWBC
			Sustainable Transport	AMR Local Indicator CP3b	TWBC
15.	Facilitate and support a diverse employment base and sustainable economic growth	SO1-SO3	Economic Activity Rates	AMR Contextual Indicator ED1	NOMIS
			Total amount of additional floorspace by type	AMR Local Indicator BD1	TWBC
			Employee Jobs within the borough by Sector	AMR Contextual Indicator BD2	NOMIS
			Change of employment floor space	AMR	TWBC
			Tourist Industry	Periodic review of Economic Development and Tourism Strategies	TWBC
			Gross shopping floor space	To be added to AMR?	TWBC
			Vacant floor space	AMR	TWBC

Appendix 1: Stakeholder Responses to Draft Consultation Report March-May 2013

Draft Sustainability Appraisal (SA) Report for the Draft Site Allocations DPD

Consultation Response Table

The criteria for recommended responses to consultation comments are as follows:

1. No amendment proposed to Draft SA Report; or
2. Amendment proposed to Draft SA Report - a general summary of the proposed amendment is then given; or
3. Amendments recommended for the Proposed Submission DPD, as a result of the comment given on the Draft SA Report; or
4. Further work needs to be undertaken before a response can be proposed.

Comment ID	Name/Organisation	Comments	TWBC Summary	TWBC Recommendation
SA/AL_1	Mrs Joanna Hillas-Smith	<p>I am commenting on 218 (Church Farm): Looking at the town boundaries this site seems to fit quite neatly. But the issues with standing water which may well be contaminated with sewerage from the water treatment plant makes it unsuitable. Any drainage would go into an already up-to-capacity drainage system. Also smells from the water treatment plant are regularly unpleasant on this site, particularly in the heat of summer. I use this field to walk my dogs in the summer but in the winter the footpaths across this site are mostly unusable. The road infrastructure is inadequate for a site of this size.</p> <p>I now comment on 1007 (Green Lane Phase 2): I cannot see any feasibility for housing or a school on this site. The road network is totally unsuitable for a school here. Mascalls Court Road and Green Lane are already a bottle neck at Mascalls School end-of-day. More people would drive to a school at this location causing further problems - where would parents park to drop off their kids? Green Lane would become a rat-run from both the Church Farm site along to Mascalls Court Road and vice-versa. The land at the end of Green Lane/Mascalls Court Road which was planted with native bushes and trees is filled with migrating birds each year some of which are rare - what would the impact be on this? The grassland at the same point floods each winter and the draining water from new houses would probably exacerbate this.</p> <p>Commenting on site 219 (Mascalls Farm): Overall if houses need to be built in Paddock Wood this would appear to have the most positive impact. The developer has made clear proposals for a new road lay out for Badsell Road and is aware of the area of outstanding natural beauty at Foal Hurst Wood and makes provision to protect and enhance this area. Flooding here is less of a problem and new ponds are included to</p>	<p>Support noted for town boundaries. <u>Site 218</u>: It is indicated in the SA that mitigation measures would be necessary for flooding. Drainage and flooding needs should be addressed through the design process. It is indicated in the SA that negative impact on local congestion and air pollution may occur. Road infrastructure would also need to be considered as part of the site design process.</p> <p><u>Site 1007</u>: Objection noted. The combined allocation of sites 218 and 1007 under Policy AL/PW3 includes provision of a new primary school within the allocation and this is considered within the SA matrix. Impacts on congestion, flooding and wildlife have been considered as part of the SA and includes need for possible mitigation and new transport infrastructure. Minor alterations to the final SA and Proposed Submission DPD would be beneficial to reflect impact on ecology and need for mitigation. The SA states that mitigation measures will be needed for flooding as part of any development on site 1007</p> <p><u>Site 219</u>. It appears that this respondent is referring to consultation carried out by a developer for specific planning application proposals and this application will be considered by the Council on its merits, separately from the Draft Site Allocations DPD</p>	<p><u>Site 218</u> No amendment</p> <p><u>Site 1007</u> amend matrix to reflect: "Mitigation measures relating to ecological issues would need to be considered in the event of any development on site 1007." Amendment for the Proposed Submission DPD: This need for ecological mitigation should be added to site detail for site 1007</p> <p><u>Site 219</u>: No amendment</p>

Comment ID	Name/Organisation	Comments	TWBC Summary	TWBC Recommendation
		<p>aid this again helping with the natural habitat. Paths and cycle routes are proposed making safe journeys to local schools. Traffic here will not impact on the current small roads around Paddock Wood as only impacts on the main routes. If a school needs to be built other locations should be considered - there may be room at this site too as it is large. As any of these proposals impact on the infrastructure of Paddock Wood - the schools and doctors surgery are already full to capacity. How would Mascalls cope with the extra children at secondary age being well over-subscribed at present?</p> <p>The Hop Farm Country Park is in liquidation talks - how about a satellite Paddock Wood village there incorporating a museum, school, shops, surgery etc. a little like the King's Hill development. Then all the developers could have their bit, the road infrastructure is already in place and the impact on the environment of Paddock Wood is minimal but still the chance for employment and income.</p>	<p>process and Draft SA Report process.</p> <p>The Council is working with Kent County Council on transport modelling to inform the Proposed Submission DPD. Given this, it is proposed that no amendments are made in response to these comments on the SA</p> <p>All sites: Concern over additional capacity of roads, schools and doctors' surgeries. These are matters which will be considered as part of the Proposed Submission DPD and are already reflected in the SA.</p> <p>Respondent suggests Hop Farm Country Park as alternative large development site. Hop Farm Country Farm is in the Borough of Tonbridge and therefore would not be directly considered by the Council.</p>	<p>No amendment</p> <p>No amendment</p>
SA/AL_2	Southborough Town Council	<p>Southborough Town Council Members have no comments on specific sites but more generally, cannot see how large-scale development in Southborough and High Brooms is sustainable in the long term. This is because the infrastructure cannot support things as they are at present. Schools in the area are at capacity, the roads cannot cope and are constantly in a state of gridlock and air pollution is at worryingly high levels. Further development without resolution of these issues would only serve to increase the strain.</p>	<p>In Southborough, the SA matrices of sites have highlighted the issues of road congestion and air quality, including the Air Quality Management Zone. As a result, the allocated sites 163, 203 and 370 have a negative score for pollution.</p> <p>The supporting Infrastructure Plan forms part of the evidence base for the Draft Site Allocations DPD and is a separate matter from the Draft SA Report process. School capacity is a matter for KCC and the potential impact on the education objective has been identified in the SA where there is any relationship with existing or future education purpose (for example, site 163 should it lose its function as a library). As sites 61, 203, 371 are either not presently in use for education provision, or not identified for potential future use, this has not shown as an impact in the SA matrices. Site 370 was considered as a mixed use site and it is possible that this might include educational use. For this reason the matrix shows an “?” uncertain scoring for this objective.</p> <p>The Council welcomes the positive comments</p>	<p>No amendment proposed to SA</p> <p>Amendment for Proposed Submission DPD: Need to draw attention to matters of Air Quality in Southborough and RTW sites where relevant</p>

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		Members support the proposed development of Site 61 (Speldhurst Road Allotments) but cannot see how any development beyond this is either feasible, due to lack of space or sustainable, regarding infrastructure.	with regard to development at site 61.	
SA/AL_3	Hawkhurst Parish Council	<p>Table 7.15 Hawkhurst - cumulative impacts of site allocations. Housing need. The provision of 110 homes up to 2026 may have a beneficial impact PROVIDED they are phased in over the period and not imposed as a single large development. However it is recognised some development sites need to be in excess of 10 units to allow for affordable housing.</p> <p>Sustainability will be increased if the agreed allocated sites are of a suitable scale and design standard to meet the highest modern insulation requirements.</p> <p>Health. What is meant by or intended for and how will community facilities etc be provided? With the continuing growth of the village should consideration be given to allocating a site for a single expanded medical facility to accommodate the existing two medical practices currently at Highgate and The Moor?</p> <p>Social inclusion. The opportunity to provide affordable housing for local people is welcome but this may also be met by Rural Exception Site development.</p> <p>Site 362 (Hawkhurst Castle) has a current consent for a nursing home with assisted living units also on the site. It is likely this will change but to a larger nursing unit without the other units.</p> <p>Education. Kent County Council as the LEA should provide an informed statement as the impact of the additional housing will have an impact on the need to improve and enhance education in the village.</p> <p>Crime. No comment other than that in 3 above regarding Hawkhurst Castle.</p> <p>Service provision. It is unclear if the current utility services due to underinvestment and lack of planned maintenance will be capable of coping with any sudden large influx of new development. Other infrastructure such as medical services may also struggle unless the planned growth is spread over the longer term.</p> <p>Efficient use of land. The inclusion of the sites on Highgate Hill is clearly not efficient use as they are viable and valuable farm land. Sites at Springfield and Woodham Hall (31 & 217) are brownfield or at least</p>	<p>There will be no formal phasing of development at Hawkhurst. Housing is proposed through a number of sites within and adjoining the settlement.</p> <p>It is also stated in the SA (on page 215, "Measures to increase sustainability and the Council's response") that conditions will be applied to minimise temporary negative impacts upon health, well-being and pollution associated with the construction phase of development.</p> <p>Appropriate design and scale is considered as part of the planning application process and not within SA.</p> <p>Infrastructure needs to support development (health and education) are considered as part of the Site Allocations DPD and not directly within the SA. The matrix scoring reflects locations in respect of sites in relation to the town centre and its health provision e.g. Site 362 was awarded "?" uncertain impact due to the greater distance from the town centre and its health services and also the increased likelihood of reliance on the car. It is stated in the matrices for the allocated sites 356, 357, 333 that there will be no likely impact upon the health objective. Sustainable location was considered a positive health benefit, along with close proximity to services and positive impact upon social inclusion. School capacity is a matter for KCC and no potential impact on the education objective has been identified in the SA for sites 362, 356, 357 where there is no clear relationship with existing or future education purpose on-site. As site 333 is adjacent to a site in use for education provision this has been awarded an "?" uncertain impact,</p>	<p>No amendment</p> <p>No amendment</p> <p>No amendment</p>

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		<p>not used for agriculture. It should be noted a national housing developer has prepared a draft scheme for 48 units at the Springfield site and retains employment currently on part of the site. Insufficient consideration has been given to the protection of the AONB.</p> <p>Pollution. Any new development will produce some form of pollution. This will become more concentrated if single large sites are developed in open countryside.</p> <p>Water/flood risk. Building on open farmland will bring along a set of problems which need to be modelled and investigated before proceeding any further. Removing surface water into nearby ditches will just push the problem downstream.</p> <p>Biodiversity. Development on agricultural land will have a high impact on the nature of the area. The sites may not be designated as such but the loss of agricultural land will not be beneficial. The "green corridor" mentioned on several occasions is either a paved footpath or a muddy track serving very little purpose.</p> <p>Natural/built environment. The development of large scale sites on greenfield land within the AONB will have a large impact on the countryside. The sites preferred by the Parish Council are either previously developed or extremely well screened from other parts of the existing built environment. Any master plan needs to show more respect for the values of the AONB and seek to protect agricultural land first. A "green corridor" cannot be considered an enhancement to the AONB, in particular at such a prominent site.</p>	<p>and the outcome would depend upon future proposed use and design</p> <p>Further work needs to be undertaken before a response can be proposed Further work needs to be carried out regarding assessment of farmland. A study has been commissioned by TWBC into this matter and the SA will be amended to reflect this additional consideration.</p> <p>The matrices 356 and 357 have been scored incorrectly for water and flood risk. The scores are given as "0" and "?" respectively and need to be changed (ie swapped around) to "?" and "0". This is an error and will be amended. It does not affect the cumulative score. Any detailed analysis will be carried out as part of a planning application process for individual sites.</p> <p>Concern for loss of biodiversity with development of agricultural land. Green corridor is insufficient retention.</p> <p>Concern over large scale sites within the AONB. Well screened sites are preferred (screened from existing development).</p>	<p>No amendment</p> <p>Matrix may need to be updated following the Land classification work</p> <p><u>Sites 356 and 357:</u> Amend matrix: Swap scores for water and flood from "0" and "?" to "1" and "0" respectively This will not result in any change to the overall scores</p> <p><u>No amendment proposed to SA:</u> The biodiversity objectives for the allocated sites of 356, 357, 333 have been given a "--" negative score to reflect the impact that development may have without mitigation measures. A green corridor should be both retained and enhanced for biodiversity value.</p> <p><u>No amendment proposed to SA:</u> The potential negative impact upon the natural/built environment has been highlighted for the allocated sites of 356, 357, 333 with either "--" or "--" negative scores.</p> <p><u>Amendment proposed to SA:</u> The</p>

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		<p>Transport. The concentration of a housing scheme on Highgate Hill will cause even greater congestion on the A229 than currently exists. This is also designated as a Primary Haulage Route by KCC. The impact will be high, the benefit low.</p>	<p>Concern about increase in congestion, particularly on Highgate Hill, which is a Primary Haulage Route.</p>	<p>matrices have been marked for sites 333, 356 and 357 to reflect their high natural environment value. However, it is not stressed in the text that they fall within the AONB. This is an error and text needs to be added to the matrices for sites 333, 356 and 357 as follows: "This site lies entirely within the High Weald AONB, which washes over the settlement of Hawkhurst"</p> <p><u>Amendment proposed to SA:</u> The text for site 357 does not state that this site is outside the LBD, and this needs to be added, as follows, "Site 357 lies outside the LBD of Hawkhurst".</p> <p><u>No amendment proposed to SA:</u> The score for transport is "-." negative for site 356 to reflect the lack of access and distance from the road. The supporting Infrastructure Plan forms part of the evidence base for the Draft Site Allocations DPD and is a separate matter from the Draft SA Report process. The Council is working with Kent County Council on transport modelling to inform the Proposed Submission DPD. Given this, it is proposed that no amendments are made in response to this comment on the SA and that the transport objectives should remain unchanged for sites 356 and 357 at Highgate Hill.</p> <p><u>No amendment proposed to SA:</u> Please refer to previous comments above regarding infrastructure in Hawkhurst.</p>

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		<p>Waste. No comment</p> <p>Energy. Previous comments regarding the existing condition of main infrastructure services apply.</p> <p>Employment. It is uncertain how these developments will provide much further local employment but will support existing businesses. [TWBC: see attached letter, which sets out the whole of Hawkhurst Parish Council's response to the Site Allocations DPD and Sustainability Appraisal. See also comments on Site Allocations DPD, Comment Nos. SAL_352, 354, 356-363]</p>	Development will support existing business .	The Council welcomes the positive comment regarding new development supporting existing businesses.
SA/AL_4	Cranbrook & Sissinghurst Parish Council	<p>Any additional housing is likely to reduce vegetation, generate additional traffic and add to congestion in the town centre and may increase the risk of flooding.</p> <p>On the Greenfield allocations Sites 294 & 298 this will have an impact on the countryside within the AONB, will result in a loss of agricultural land, will compromise habitats and will have an adverse impact on access to the countryside However, residential development will help to support the local economy and the vitality and viability of the town centre. [TWBC: see also Comment No. SAL_385-397 of the Site Allocations DPD].</p>	<p>Concern over reduced vegetation, increase in town centre congestion and increase in the risk of flooding.</p> <p>Concern over sites 294 and 298, development will impact upon AONB and loss of agricultural land and adverse impact upon access to the countryside.</p>	<p><u>No amendment proposed to SA:</u> The supporting Infrastructure Plan forms part of the evidence base for the Draft Site Allocations DPD and is a separate matter from the Draft SA Report process. The Council is working with Kent County Council on transport modelling to inform the Proposed Submission DPD. Given this, it is proposed that no amendments are made in response to this comment and that the transport objectives should remain unchanged for Cranbrook at present.</p> <p><u>No amendment proposed to SA:</u> Sites 80, 11, 294, 298 have been awarded a “-“ negative for the flooding objective and site 329 have been awarded a “--“ double negative. Sites 212, 8, 9, 13, 293, 318, 328, 347 have been given an “?” uncertain scoring for this objective, in order to convey that there may be flooding issues on these sites. Therefore, it is proposed that no amendments are made in response to this comment and that the flooding objectives should remain unchanged at present. Flooding in Crane Valley</p>

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			Residential development will support local economy and viability of town centre .	<p>comments needed. Need standard approach (Core policy 5, point 2 relating to flood prevention and NPPF).</p> <p><u>No amendment proposed to SA:</u> The allocated sites 294 and 298 have been awarded a "--" double negative score for efficient land use, natural/built environment and biodiversity. These scores reflect the sensitive nature of the sites and potential loss of countryside within the AONB and do not need to be changed.</p> <p><u>Further work needs to be undertaken before a response can be proposed</u> Further work needs to be carried out regarding assessment of farmland. A study has been commissioned by TWBC into this matter and the SA will be amended to reflect this additional consideration.</p> <p><u>No amendment proposed to SA:</u> Loss or diversion of a Public Right of Way would be considered as part of a planning application (Core Policy 8, point 7 making reference to Public Rights of Way).</p> <p><u>No amendment proposed to SA:</u> The council welcomes the positive comments concerning the local economy and the vitality and viability of the town centre.</p>
SA/AL_5	Taylor Wimpey Homes	<p>5.2.2 The site proposed as Policy AL/CR 4 (Site 294 /298) was the only site that came out as a significant negative impact (i.e. a double negative score - -) against the sustainable objectives of:</p> <ul style="list-style-type: none"> • Efficient use of land • Biodiversity • Natural/ Built environment <p>5.2.3 Summary recommendations were made on pages 161 and 162 of the Councils Sustainability Appraisal for the above Policy AL/CR 4 (site 294/298). It Stated:</p>	Site 294, 298 , which scored "--" double negative for a number of issues and is being allocated as Policy AL/CR 4.	<p><u>No amendment proposed to SA:</u> The allocated sites 294 and 298 have been awarded a "--" double negative score for efficient land use, natural/built environment and biodiversity. These scores reflect the sensitive nature of the sites and potential loss of countryside within the AONB and should not be amended.</p>

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		<p>“Development on this site could potentially have a strong negative impact (my emphasis) upon local landscape and the natural environment and result in the loss of greenfield land. This would represent extension of the town boundary into sensitive landscape, which is entirely within the AONB and includes 10% ancient woodland. The Crane Valley is positioned within a large proportion of this site; therefore the centre of the site comprises wet wood land and a steep aspect. From this point of view it does not present efficient land use and would have a strong negative upon the biodiversity and natural environment objectives.”</p> <p>5.2.4 This same site also gained a negative impact (i.e. a single negative score -) against the sustainable objective of:</p> <ul style="list-style-type: none"> • Water/ flood risk <p>The Councils Summary recommendations stated “...whether there would be flooding issues from Crane Brook, but this is likely and would require strong mitigation”</p> <p>5.2.5 The NPPF state in paragraph 100 that Local Plans should apply a sequential , risk-based approach to the location of development to avoid where possible flood risk to people and property.</p> <p>5.2.6 The aim of the sequential test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonable sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding. (NPPF paragraph 101)</p> <p>5.2.7 This site (Policy AL/CR 4) also raises concerns (i.e. identified via ? in Table 7.10 and site summaries 294 and 298) on matters such as:</p> <ul style="list-style-type: none"> • Heath • Social inclusion • Transport and • Energy <p>5.2.8 On the matter of transport the sites SA summary states: “There would be possible negative impact from the point of view of increased local congestion on minor roads and access issues would need to be resolved. An access point to existing roads would need to be established; access at Hartley Road is the most likely, but this is a fairly difficult road junction, which would need upgrading” <i>[TWBC: see also Comment Nos. SAL_491 to xxx on the Site Allocations DPD consultation draft. The whole submission has been attached as a supporting document.]</i></p>	<p>Sites 294, 298, scored “-“ negative for water and flood risk and is being allocated as Policy AL/CR 4.</p> <p>Site 294 and 298 “?” uncertain scoring for other objectives of health, social inclusion, transport and energy and is being allocated as Policy AL/CR 4.</p>	<p><u>No amendment proposed to SA:</u> The allocated sites 294 and 298 have been awarded a “-“ negative score for water and flood risk. This score reflects the potential flood risk in and around the Crane Valley and should not be amended. The decision to allocate a site is a matter for comment upon the Draft Site Allocations DPD not the Draft SA Report.</p> <p><u>No amendment proposed to SA:</u> The objectives for health, social inclusion, transport and energy were given an “?” uncertain scoring. It was felt that the likely outcome for these objectives were uncertain at this stage and that these objectives were very much dependent upon the nature and design of development for sites 294 and 298. It is not proposed that these should be amended.</p>

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SA/AL_6	Ms L Welsford	<p>356 AND 357, LAND OFF HIGHGATE HILL, HAWKHURST ALSO SOME GENERAL COMMENTS</p> <p>I object most strongly to the allocation of sites 356/357 (Highgate Hill), on the grounds that it would destroy the open, rural character of the High Weald Area of Outstanding Natural Beauty and would be contrary to the National Planning Policy Framework and Core Policy 4 Environment.</p> <p>I also raise objection regarding other issues, including harm to biodiversity and traffic congestion.</p> <p>Harm to Area of Outstanding Natural Beauty</p> <p>There would be clear and substantial harm to the open and rural character of the Area of Outstanding Natural Beauty. This is identified in the sustainability Appraisal, yet the Site Allocations D.P.D. fails to recognise or give due weight to this fact.</p> <p>The National Planning Policy Framework seeks to resist major development in Area of Outstanding Natural Beauty. It states that "Great weight should be given to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty". (Paragraph 115). The site Allocations Development Plan Document does not give great weight to the landscape issues and fails to comply with the National Planning Policy Framework. Site 356/357 (Highgate Hill) is an area of undeveloped open countryside, which is of high scenic beauty and rural quality, particularly due to its topography. The slope renders it particularly sensitive and visible in long distance views from the road and a number of well used public footpaths. Paragraph 111 of the National Planning Policy Framework states that: "Planning Policies.... should encourage the effective use of land re-using land that has been previously developed (brown field land) provided that it is not of high environmental value". Paragraph 110 also states that: "Plans should allocate land with the least environmental or amenity value.....".</p> <p>Site 356/357 (Highgate Hill) is a greenfield site of high environmental and visual amenity value. Its allocation is therefore clearly contrary to the site selection strategy set out in the National Planning Policy Framework. It is noted that the Site Allocations Development Plan Document contains a significant number of previously developed sites of much less environmental value, some even within the limits of the built development. Clearly the National Planning Policy Framework suggests that these sites should be considered first and in my view, given the weight attached to the landscape issues in Areas of Outstanding Natural Beauty, it has not been demonstrated that these other sites are all less suitable.</p> <p>The Core Strategy Development Plan Document states that "the Borough Council has a statutory duty to conserve and enhance the</p>	<p>Object to sites 356/357 Highgate Hill due to its impact upon the open rural character of the AONB.</p> <p>Also opposed to negative impact upon biodiversity and increased traffic congestion. DPD fails to give weight to AONB.</p> <p>NPPF seeks to resist development in AONB.</p> <p>Site 356, 357 is greenfield site therefore contrary to site selection strategy in NPPF. Concern that previously developed sites have not been demonstrated to be less suitable.</p> <p>Concern that proposals regarding the AONB are contrary to TWBC Core Strategy.</p>	<p><u>No amendment proposed to SA</u></p> <p>All of the topic areas outlined here of landscape, biodiversity, traffic congestion have been addressed through the scoring process for the SA. It is not proposed that they will be amended. (see details for Hawkhurst at SA3).</p> <p><u>No amendment proposed to SA</u></p> <p>The score awarded for natural environment and biodiversity does reflect this potential impact. This has been carried through to the cumulative impact section of the Draft SA Report.</p>

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		<p>natural beauty of the High Weald Area of Outstanding Natural Beauty". In my view, the housing strategy proposed for Hawkhurst would fail to either conserve or enhance the Area of Outstanding Natural Beauty. The Sustainability Appraisal Summary for Hawkhurst (Page 9) shows that the housing allocations (HA1-HA3) taken together have a double negative impact on the national environment (and a negative impact on biodiversity). This clearly indicates that this strategy will destroy the quality of the A.O.N.B. and its scenic beauty, which is unacceptable, given the duty "to conserve and enhance". Indeed, Page 94 states "The three Greenfield sites will have a cumulative impact on the countryside within the A.O.N.B".</p> <p>This is a cumulative negative impact on its character and openness, which, as the document states, will be permanent.</p> <p>The site selection process laid out in the Site Allocations D.P.D. has not been properly followed in my view. Page 9 of that document states that, under stage 4, sites with a significant negative impact on national landscape designations will be discounted. The Sustainability Appraisal categorises Site 357 as double negative for natural environment impact. This must be a significant negative impact on the A.O.N.B., because it is the lowest (and therefore most harmful) category awarded. In consequence, the failure to discount Site 357 directly contravenes the methodology stated to be used and results in inconsistent assessment.</p> <p>Whether full and comprehensive assessment of sites 356 and 357 has been carried out is questioned. Firstly, the planning history does not appear to have been considered. An appeal for 20 dwellings was dismissed upon the northern part of the site under reference TW/89/0008 (APP/M2270/A/89/119453) due to the harmful impact upon the landscape. The inspector concluded that "the fact remains that development of this land would clearly be seen as a loss of part of this attractive countryside around Hawkhurst, and I am satisfied that the result would be a marked diminution in the rural quality of this area..." He also concluded that landscaping and setting buildings into the hillside "do not overcome the fundamental objection here".</p> <p>The quality and Area of Outstanding Natural Beauty status of this landscape have not diminished and development would remain harmful to the attractive, rural character. This important history does not appear to have been considered.</p> <p>Furthermore, the degree of site assessment is also questioned. The Sustainability Appraisal refers to views from public footpaths and states that "longer views from the public footpath as it turns 90 degrees and heads north would be limited"</p> <p>It fails to make reference to the views when the public footpath turns south leading down the hill to Talbot Road, which suggests that these views clearly have not been considered. These are key views (looking</p>	<p>Concern over cumulative negative impacts for the countryside.</p> <p>Failure to discount site 357 demonstrates that methodology on page nine has not been followed.</p> <p>Inconsistent assessment of Site 356 and 357 in Allocations DPD.</p> <p>Key views have not been considered at site</p>	<p><u>No amendment proposed to SA</u> The score awarded for natural environment has been carried through to the cumulative impact section.</p> <p><u>No amendment proposed to SA</u> The assessment process was carried out consistently across the sites and the potential harmful impact upon the landscape has been highlighted through the scoring system for natural environment.</p> <p><u>No amendment proposed to SA</u> Comment on the views for Site 357 will be checked and amended if necessary. The detailed landscape impact of development of the site will be considered should it be allocated and then considered further for</p>

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		<p>uphill) across open countryside in which the site is highly prominent and seen as an important part of the rural landscape and scenic beauty. Development would be a jarring, harmful feature in these key views, destroying the open, rural character, which dominates this side of Highgate Hill. These points lead to strongly questioning whether these sites have been fully and properly assessed.</p> <p>No full assessment of the landscape quality has been carried out and where some assessment is made it is inconsistent. The site assessments in Appendix 1 of the Site Allocations Development Plan Document are clearly inconsistent. In particular, the brief descriptions of some sites, (including numbers 31 and 32) state that they are in the Area of Outstanding Natural Beauty. The analysis for site 1027 (Hawkhurst Station Business Park) discusses the impact upon the Area of Outstanding Natural Beauty and refers to Core Policy 4 relating to the High Weald A.O.N.B. The description and analysis for sites 356/357 (Highgate Hill) do not at all refer to the Area of Outstanding Natural Beauty siting or Core Policy 4 and these sites also lie in Area of Outstanding Natural Beauty. This is clearly inconsistent and indicates that the analysis has not been properly considered.</p> <p>The justification in the Site Allocations Plan Document Appendix 1 relating to sites 356/357 (Highgate Hill) states that it would not significantly expand “the built extent of the village along its main approaches”. It does not consider the relationship with the existing built form of the village. The site extends very substantially in both the southerly and westerly direction beyond existing built development. It is a significant encroachment into the open countryside and is not at all related to the existing pattern of development. Existing development to the south is a small group of buildings of linear form, fronting the road. New development would be clearly divorced from the existing pattern and layout. No assessment of the key issue, landscape harm has been made. Policy HA2 simply states that it “would require a strong and robust landscape framework”. This clearly could not adequately mitigate for the fundamental harm to the open character of the Area of Outstanding Natural Beauty caused by built development upon an area which currently contains no buildings.</p> <p>The justification also states that there is partial screening to the west, north and east. There is practically no screening whatsoever to Site 357 – it almost wholly joins open countryside – and Site 356 is not screened at all from the south. The combined site is highly prominent, due to the lack of screening and its topography. There would be views of development over hedging, because of its elevation. The varied topography of Hawkhurst is a key factor of its character. The Site (356/357), being on a hill and visually well related to surrounding open fields, contributes strongly to that character, which is intrinsic to the quality of the High Weald Area of Outstanding Natural Beauty. Built</p>	<p>357.</p> <p>Lack of consideration of landscape quality.</p> <p>Lack of consideration to AONB in SA site assessment of 356, 357. Not mentioned in overview.</p> <p>Concern of lack of consideration of views from all directions in SA.</p> <p>356, 357 does not relate to the existing pattern of development</p> <p>Lack of screening site 356, 357 is commented upon in justification (not in SA matrices).</p>	<p>development.</p> <p><u>No amendment proposed to SA</u> The detailed landscape impact of development of the site will be considered should it be allocated, through the development management process.</p> <p><u>Amendment proposed to SA:</u> The matrices have been marked for sites 333, 356 and 357 to reflect their high natural environment value. However, it is not stressed in the text that they fall within the AONB. Text needs to be added to the matrices for sites 333, 356 and 357 as follows: “This site lies entirely within the High Weald AONB, which washes over the settlement of Hawkhurst”</p> <p><u>No amendment proposed to SA</u> The detailed landscape impact of development of the site will be considered should it be allocated, through the development management process.</p>

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		<p>development here would destroy the existing open, rural character and interrupt and harm high quality scenic views (from the road and public footpaths), including especially long range views from the south. As this is a nationally important landscape and the N.P.P.F. confirms great weight must be given to its conservation, such substantial harm is clearly not acceptable.</p> <p>Inclusivity The Sustainability Appraisal states that the impact upon social inclusion will be positive. In respect of the Community Hall, I disagree for the following reason: The Highgate Hill sites (356/357) lies on a hillside, with a steep gradient between the site and the main part of the village to the north. This would have a negative impact for people with mobility problems, the elderly and people with prams who would have to negotiate this steep incline to access the site. The site for a community facility should be chosen to provide equal accessibility and comfort for all and this site would not achieve this. The option that users of the facility could drive to it would be contrary to the aims of sustainability and would result in further visual harm through the need for greater parking areas. No justification for why this particular site is the most suitable site for a community facility has been given.</p>	<p>Disagree with positive impact upon social inclusion due to steep gradient into settlement centre.</p>	<p><u>No amendment proposed to SA</u> Whilst it is acknowledged that there is a steep gradient on part of the route to the town centre, there are nevertheless services and facilities available at a short walking distance with public footpaths for clear access.</p>
SA/AL_7	Mr Phillip Williams	<p>6.12 It is proposed that an area to the south of Cranbrook, 'land adjacent to the Crane Valley', is allocated for development for housing and associated uses, incorporating:</p> <ul style="list-style-type: none"> • land south of High Street (Site 294) • land south of High Street and west of Orchard Way (Site 298) <p>“Core Policy 12 : Development in Cranbrook establishes the development strategy for the town and highlights the need to strengthen the character of the settlement, including the Conservation Area and the town’s setting within the AONB.”</p> <p>These 2 statements are contradictory in that the erection of 250 plus dwelling houses on sites 294 and 298 will result in the urbanisation of 23.86 Hectares of the High Weald countryside which is part of an Area of Outstanding Natural Beauty National Level. This is also in conflict of the scheme’s stated aim to conserve and enhance the setting of the town. It is misrepresentative to say it is on “land adjacent to the Crane Valley” This development goes through the entire Crane Valley and effectively tarmacs it over. The proposed development of the Crane Valley will therefore destroy precious green belt countryside and deny the current inhabitants of the town the amenities provided by the rights of way that criss-cross these sites. The rural aspect of the Southern approach to the town will be destroyed.</p> <p>Methodology and Assessment Criteria</p>	<p>Proposal for development of site 294 and 298 will be in conflict with Core Policy 12. Development within AONB, will not conserve/enhance setting of town. Destroys greenbelt countryside and reduces access to amenities by rights of way. Rural aspect of south of town destroyed.</p>	<p><u>No amendment proposed to SA</u> Sites 294 and 298 are given a scoring that reflects this issue in the SA and this has been carried through to the cumulative assessment. The public footpath has also been referred to in the text of site 298.</p> <p><u>Amendment proposed to SA:</u> Site 294 needs to have the following text added: “There is a public footpath across this site.”</p>

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		<p>The Council has not complied with Stage 4 of the methodology and assessment criteria i.e. "Detailed consideration of sites and discounting of sites falling into the following categories:" Sites with a significant negative impact on nationally and internationally important nature conservation sites and landscape designations" Site 294 The sustainability appraisal states a "number of negative outcomes that could result if this site was developed due to the sensitive landscape within the site including the Crane Valley where development would have a strong negative impact upon biodiversity and the natural environment objective. It is concluded that the sensitivity of the site is likely to limit the site's capacity to accommodate built development."</p> <p>Comment This statement suggests that the view is that by its own criteria this site should be discounted and the Planning dept has failed to abide by its own criteria thereby making the entire scheme vulnerable to Judicial Review</p> <p>Proposal (Landscape Buffers) Suitability "Not all parts of Site 298 as submitted are considered suitable for built development but some areas could provide open space and landscape buffers."</p> <p>Comment On the plans for sites 294 and 298 there are indicators of "buffer zones" mainly along parts of the stream, to the rear of the conservation area and alongside Hartley Road. The area that runs along Goddard's Close appears to be zoned for development and there is no indication that there is to be a buffer zone for the residents of these houses, and the public right of way along side them. The affect of this development on these houses and the loss of amenity to the residents and the negative effect on the value of their homes (being the only investment many will have) is not mentioned anywhere in the impact assessments or suitability assessments in these proposals. There is much talk about the amenities the development will provide and no mention of the devastating effect these proposals will have on the inhabitants of these houses who currently live on the rural edge of the settlement who will have their houses surrounded by development. Whilst the countryside adjacent to these dwellings is zoned for house building the "buffer zones" will have the effect of making urban parkland of the areas to the rear of the high street and the stream which are currently part of continuous countryside. There is a breakdown in logic in the proposal's contention that the buffer zones will benefit the people of Cranbrook when the town's inhabitants already have the benefit of the spaces being part of continuous open countryside. The third large buffer zone appears to be alongside the A229 / Hartley Road – the purpose being to preserve the rural character of the approaches to the town and to shield the development from the eyes of passing motorists. Why shield</p>	<p>Site 294, methodology has not been followed for selection of sites, particularly regarding biodiversity and the natural environment and also the outcome of the Sustainability Appraisal.</p> <p>Concern over insufficient buffer zones around sites 294 and 298, particular reference to Goddards Close.</p> <p>No need for a buffer zone alongside the A229 for passing motorists.</p>	<p><u>No amendment proposed to SA</u> The score awarded for natural environment and biodiversity does reflect this potential impact. This has been carried through to the cumulative impact section.</p> <p><u>No amendment proposed to SA</u> The detailed landscape details of development of the site will be considered should it be allocated, through the development management process. However, this information has been forwarded through to the relevant officer for Cranbrook in order that consideration can be given to whether this content in the DPD document should be amended.</p> <p><u>Amendment proposed to DPD:</u> This information has been forwarded through to the relevant</p>

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		<p>the development from the view of the passing traffic? If the dwellings are in the local character and style the space devoted for this purpose could better utilised elsewhere to create a buffer zone between the existing rural edge and the development.</p> <p>Alternative Proposal: However it could be said if the existing inhabitants of Cranbrook would derive some benefit if a buffer zone were in place along the southern edge of these properties, giving a pleasant green setting for the existing right of way that would presumably form part of the scheme and preserve some of the character of the setting these properties currently enjoy which will be destroyed by the proposals in the current form.</p> <p>In General On balance and in general the effect on Cranbrook will be damaging. The best that the Sustainability Assessment can say is that the 'Minor beneficial impact' in Para 7.12.15 that the extra housing 'should help to support the local economy and the vitality and viability of the town centre'. The town centre already has vitality. Some shops face difficulty but that is common to all parts of the country and more likely to be an effect of the internet/recession/out of town shopping centres etc. The contention that increasing the population of the town will improve matters is not evidence based in any form. The Sustainability Assessment lists numerous unsustainable aspects of the development including:</p> <ul style="list-style-type: none"> • the extra housing generating 'additional traffic and congestion on local roads and in the town centre which could reduce air quality and impact on quality of life' (para 7.12.2) – congestion being already the worst feature of the Conservation Area; • 'adverse impact on access to the countryside' (para 7.12.3); • 'significant loss of previously undeveloped agricultural land which has landscape (AONB) and biodiversity value' (para 7.12.7); • 'likely to reduce vegetation which acts as a carbon sink and promotes air quality', and 'likely to generate traffic movements which will contribute to air pollution' (para 7.12.8); • 'will reduce natural drainage and water storage which has the potential to...increase the risk of flooding' (para 7.12.9); • 'significant cumulative effect on the countryside within the AONB' (para 7.12.11). <p>The Sustainability Appraisal has no concern with visual or aesthetic issues, but these greatly matter. Visually, the proposed housing and its access arrangements will be damaging to the fine southern entry to Cranbrook on the edge of the Conservation area, and will diminish the rural views from upper High Street which are particularly recognised in the TWBC Appraisal of the CA. In addition to their intrinsic value, these</p>	<p>Consider residents instead and a buffer zone along the southern edge for their benefit.</p> <p>Overall impact on Cranbrook will be damaging. No evidence that increasing local population will increase the vitality or the viability of the town centre.</p> <p>Concern over negative impacts given in the Sustainability Appraisal, in particular relating to traffic and congestion on local roads, access to the countryside, loss of agricultural land, reduced air quality, increased risk of flooding.</p> <p>No comments on visual impact in SA, negative impact upon tourism.</p>	<p>officer for Cranbrook in order that consideration can be given to whether this content in the DPD document should be amended.</p> <p><u>No amendment proposed to SA</u> The scores awarded reflect these potential impacts. This has been carried through to the cumulative impact section in order to calculate a final score.</p>

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		<p>add to Cranbrook's attraction for tourists and other visitors. No assessment of likely infrastructure, educational or medical consequences has been presented. Junction/access problems in relation to the proposed development appear also to be considerable and any solution is likely to detract seriously from their immediate surroundings.</p> <p>The increase in the population and change in demographic will do nothing to improve Cranbrook and is more likely to cause harm. No consideration is given to where people will work go to school or access medical services. There is no industry locally – Maidstone is a £6 bus fare away and the centres of Tunbridge Wells Hastings and Ashford some considerable distance and only accessible by car. The assertion that the homes built will be affordable prompts the question "by whom". It seems highly unlikely given the existing developments by those interested in this scheme that homes will be for sale at much less than £300,000 and it is therefore more likely that the dwellings built will be occupied by those who can also afford to pay £4,500a year to travel to London to work thus creating a mini commuter dormitory settlement which could hardly be said to be meeting the needs of the local people. The size of the scheme ensures that the developments will be carried out by large outside developers with no local connections and will do nothing to benefit the local employment market or economy.</p> <p>Alternative Proposal</p> <p>There is no evidence Cranbrook requires an expansion on the scale proposed though obviously clearly some expansion is required for the benefit of those existing families and businesses in Cranbrook. The current numbers have been imposed by central government without regard for the needs of the local community. It is more likely that extra 50 - 75 dwellings would be adequate to allow for Cranbrook's natural expansion needs. Many of those are provided for in other proposed sites in smaller developments that are far less intrusive than AL/CR4. The previous consultation threw up many Brownfield sites within the built up area of Cranbrook suitable for smaller developments which could be built by local firms and provide employment for local tradesmen and thereby contribute to the local economy without destroying 23.86 Hectares of the High Weald countryside.</p>	<p>Concern over school places and medical services. Lack of local employment opportunities.</p> <p>Lack of affordable housing in new development.</p>	<p><u>No amendment proposed to SA</u> Comment on local housing need targets and appropriate targets should be addressed through comments on the main Allocations DPD.</p>
SA/AL_8	Mr Edward Douglas	<p>My comments relate to the overall allocation of the target of 300 new homes in the Cranbrook area rather than a criticism of any particular site. In particular I question the conclusions in the following related paragraphs:</p> <p><i>Para 7.12.15 ' Transport - Improve travel choice and to reduce the need for travel, particularly by car/lorry to reduce road congestion. Minor beneficial impact. Sites 11, 80, 109, 298 and 1018 have the</i></p>		

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		<p><i>potential to provide employment, housing, shops and services in accessible locations within the LBD. Site 80 should provide local employment opportunities, thus reducing the need to travel. The sites are all edge of settlement or town centre allowing moderate or good non-car access to facilities and to the open countryside. However new development on this scale is likely to generate traffic movements which may cause local congestion. Policies CP11 and CP3 should ensure that sustainable transport is promoted.</i></p> <p>Para 7.12.15 ' <i>Employment Facilitate and support a diverse employment base and economic growth Minor beneficial impact. Residential development should help to support the local economy and the vitality and viability of the town centre. Site 80 may create additional local employment. There will be temporary beneficial impacts on employment during the construction phase on allocated sites.</i></p> <p>Employment in Cranbrook has historically been in the areas of agriculture, education and retail. Agriculture has been in decline for many years and now retail is following suit with the internet generation making more & more purchases online. The belief that adding large numbers of new homes to Cranbrook will improve the struggling retail sector seems naïve and to ignore the current trends in society. Cranbrook's success as a retail centre in the internet age depends on it having character and beauty with the shops being unique and high quality. It seems to me that adding so many new houses to Cranbrook runs the risk of actually making things worse for retail businesses as the High Street becomes ever more congested and the town more sprawling putting off tourists & 'destination shoppers' – whilst the new residents will simply purchase the majority of their needs from the internet or large out-of-town retail parks in Tunbridge Wells, only using local shops for the occasional purchase.</p> <p>This development plan appears to be proposing high quality homes at market prices (traditionally higher in Cranbrook than surrounding areas due to the Cranbrook School Catchment Area factor) but without the employment opportunities to match. These new homes will obviously appeal to well-off professionally qualified people; however, Cranbrook has little in the way of engineering, technology, health, marketing, media or finance opportunities. I believe that the majority of the 300 new homeowners are likely to find employment outside the Cranbrook area in Tunbridge Wells, Maidstone, Paddock Wood or London. This has obvious consequences for travel and congestion directly contradicting CP3.</p> <p>The potential for employment at site 80 'Post Office Delivery Depot' seems very limited and likely to be limited to low-skill retail jobs. The</p>	<p>New homes in Cranbrook will not improve the retail sector.</p> <p>Increase in congestion and urban sprawl will decrease tourism and destination shoppers.</p> <p>No new opportunities for local employment to match the housing.</p> <p>Limited employment opportunity at site 80.</p>	<p><u>No amendment proposed to SA:</u> Capacity for transport infrastructure will be investigated further and the Council is involved with the Highways Agency in further work on the Allocations DPD. The Council is working with Kent County Council on transport modelling to inform the Submission Draft DPD. Given this, it is proposed that no amendments are made in response to this comment and that the transport scoring should remain unchanged for Cranbrook at present.</p>

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		<p>hope that this site will provide any significant employment opportunities for the 300 new homes seems unreasonable, to say the least. CP7 identifies Gill's Green as a Key Employment Area that would benefit Cranbrook. However, other than identifying the site there appears to be no benefits or incentives for businesses to establish themselves there. The site appears to be most suited to light manufacturing or warehousing businesses – neither of which are likely to offer much in the way of professional job opportunities.</p> <p>To summarise: the sheer size of the development plan runs the risk of ruining the fragile retail economy in Cranbrook by taking away what natural advantages Cranbrook has in the first place. Despite the KEA at Gills' Green, Cranbrook will never have the employment capacity for this number of new homes. We run the risk of Cranbrook either turning into a dormitory town or going in the opposite direction and becoming a town relying on the low pay from the retail sector</p>	<p>No incentive to encourage Gills Green at a Key Employment Area.</p> <p>Scale of development will ruin retail economy.</p>	
SA/AL_9	Mr Colin Watney	The Appraisal appears to have given no consideration to light pollution.	No consideration to light pollution .	<p><u>No amendment proposed to SA report:</u></p> <p>There are no designated dark skies in the Borough. However, saved Local Plan Policy EN8 seeks to ensure that all outdoor lighting is sensitive to its context. The Town/Parish Councils are consulted on the appropriate level of lighting in new schemes and conditions are attached where appropriate on planning permissions.</p>
SA/AL_10	Ward Homes	<p>These representations are produced on behalf of Ward Homes in respect of Policies AL/HA1, AL/HA2, AL/HA3, which propose the allocation of 3 sites in Hawkhurst for housing, and the decision by the Council not to allocate our clients land – Site 64, Land at Fowlers Park, Hawkhurst. They raise serious concerns as to the soundness of the draft DPD and the objectivity and consequent reliability of the Consultation Sustainability Appraisal in the context of the comparative assessment undertaken of the sites put forward for consideration.</p> <p>Sustainability Appraisal</p> <p>It is evident from the draft Site Allocations DPD that based upon the Council's assessment of the sites put forward there are 4 preferred sites, all of which are proposed for allocation (Site 362 (Policy AL/HA1), Sites 356 and 357 (Policy AL/HA2) and Site 333 (Policy AL/HA3). However, our client's site (Site 64), which while not specifically allocated, is identified by the document as a possible site for future</p>	Site 64: Comment upon decision not to allocate site 64 . Concern over soundness of draft DPD and SA in the context of comparative assessment of the site put forward.	<p><u>No amendments are proposed in</u></p>

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		<p>growth post 2026. It must follow therefore that our client's site is considered by the Council to have merit as a site for housing. Looking to the Sustainability Appraisal, which contains the comparative assessment undertaken of the sites, the results of which have informed the decisions on which to allocate, it is considered that the appraisal has not been undertaken on a consistent or objective basis with some of the conclusions drawn seemingly skewed against our client's site. Indeed, the assessment appears to have made some rather sweeping judgements and in many cases the issues raised by the sites are identical and yet different conclusions have been reached. Key points of note in relation to the scoring of our client's site compared to others are as follows:</p> <p>Education</p> <ul style="list-style-type: none"> The site scores a '?', which while not explained in relation to Site 64, appears in relation to Site 333 to be linked to the location of the site adjacent to the school and the need to achieve an appropriate relationship with it. This is a matter of appropriate layout at the stage of detailed design, and as is shown by the current application scheme, it is possible to develop the site to achieve this. <p>Efficient Land Use</p> <ul style="list-style-type: none"> Site 64 is scored '--', which is lower than Sites 33, 356 and 357, all of which are greenfield sites located outside the LBD within the AONB. The merits of Site 362 in terms of its previously developed nature are acknowledged here, but it cannot be the case that Site 356, which is primarily greenfield comprising only a small previously developed area, should score the same. Furthermore given the acknowledged relationship between Site 64 and Site 333 by reason of TWBC Site Allocations DPD Consultation Representations by Ward Homes location, they should not score differently. At the very least Site 64, 333 and 357 should score equally, with Site 356 scoring slightly more but less than Site 362. <p>Biodiversity/Built Environment</p> <ul style="list-style-type: none"> All of the sites in question are located outside but adjacent to the limits of built development and within the AONB and on this basis, and accepting Site 362's previously developed nature, Sites 64, 333, 356 and 357 should receive comparative scores. However, in those cases an assumption is made (in the absence of detailed proposals or analysis) that mitigation measures could be put in place to overcome any negative effects and yet the same approach is not adopted towards Site 64 where an application exists that actually 	<p>Conclusions and scoring skewed against proposed development site 64.</p> <p>Objection to "?" fro education.</p> <p>Objection to "--" for efficient land use site 64 compared to other sites.</p> <p>Objection to score for biodiversity for site 64</p>	<p>response to these comments at this stage. The methodology used in assessing sites is felt to be consistently applied across sites.</p> <p><u>No amendments are proposed</u> in response to these comments at this stage. The methodology used in assessing sites is felt to be consistently applied across sites.</p>

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		<p>identifies constraints and demonstrates how appropriate mitigation measures could be implemented with negligible consequences for these interests.</p> <ul style="list-style-type: none"> Curiously, the matter of precedent is raised in relation to Site 64. This is misguided as there is no other land for which it would form a precedent other than its status as a greenfield extension to the existing settlement. It is also despite the fact that this point could equally relate to all of the other sites and should not be a determining factor here as a need for land release beyond the built limits has been established and will arise from hereon in. <p>Transport</p> <ul style="list-style-type: none"> Site 64 has again received the poorest score, and this is despite the fact that it is actually possible to gain safe access to the site and it is within walking distance of the facilities of the settlement as confirmed by KCC in relation to the current application. It does not follow therefore that Site 356, which has no means of being accessed other than via the release of Site 357, performs better. This simply cannot be the case. <p>Had the scoring been undertaken on an objective basis we believe our client's site would have scored more favourably placing it at least equal, if not ahead, of the preferred greenfield sites. To demonstrate this point we enclose at Appendix 1 an amended Table 7.13, which it is considered provides a more accurate reflection of Site 64's merits. [TWBC: see Site Allocations Comment Nos. SAL_790-794 and supporting information attached].</p>	<p>Query that development of site 64 bring up issue of precedent for future development.</p> <p>Objection that Site 64 has received the poorest score for transport, particularly in comparison with site 357.</p>	
SA/AL_11 SA/AL_12	Rydon Homes Ltd	<p>Table 7.13</p> <p>Rydon Homes supports Policy AL/HA 3 of the draft Site Allocations DPD, which proposes to allocate Site 333. However we question some of the draft sustainability appraisal conclusions concerning Site 333 as recorded in Table 7.13.</p> <p>Firstly, the table questions the impact of Site 333 on the education objective. It is suggested in the site specific appraisal at Appendix 3 that development of the site could have a potential negative impact on the education objective. It is not clear why this should be the case. Lots of schools are located adjacent to housing development. Rydon Homes is not aware of any evidence to suggest that this affects educational achievement or standards. Unless evidence is available to suggest a potential negative impact, the site should be scored as neutral.</p> <p>We would also question why the Site 333 is scored as a negative for</p>	<p>Rydon Homes with interests in Paddock Wood (Church Farm site, site allocation 218). Comments have been made by the Planning Officer on these consultation comments. The section relevant to Sustainability Appraisal is section 5 and comments can be found below. Some concern over assessments of three competing sites at Paddock Wood (in section sites) but does not feel that this would change the outcome.</p>	No amendment.

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		<p>efficient land use when Site 356 which is also a green field site allocation is scored as a positive and Site 357, part of the same green field allocation as Site 356 is given a question mark for this criterion.</p> <p>Similarly we would question why Site 333 has a double negative for natural/built environment when Site 356 has only a negative.</p> <p>We would ask that further consideration is given to the scoring in Table 7.13 to achieve a more balanced and consistent appraisal. [TWBC: see also Comment No. 1145 of the Site Allocations DPD Consultation Draft].</p>		
Contd from above (comment 11)	Rydon Homes Church Farm, extracted from planning officer's submission section	<p>5.2 Appendix 1 to the Site Allocations DPD contains Site Templates for each of the sites in Paddock Wood. Summaries of the assessment of each of the three sites are contained in the Sustainability Appraisal and are compiled in the table below. [TWBC: see table in attached supporting document]</p> <p>5.3 As is clear from the above summary table, there are some key differences with regards to the relative performance of the three main competing sites at Paddock Wood against the sustainability appraisal objectives.</p> <p>Objective 1</p> <p>5.4 Objective 1 seeks to provide sufficient housing to meet identified needs, including affordable housing. Due to the larger size of the Mascalls Court Road it is assessed to have a strong positive impact whilst the other two sites are assessed to have a minor positive impact. Due to the constraints identified by the Council in relation to the potential development of the Mascalls Court Road site the capacity of the site is likely to be significantly reduced which will reduce the currently assessed higher relative positive impact currently identified in the Sustainability Appraisal.</p> <p>Objective 2</p> <p>5.5 Objective 2 of the Sustainability Appraisal seeks to improve health and reduce health inequalities. None of the sites are proposed to provide any medical or health facilities although the local authority may seek contributions to mitigate any negative impacts of the proposed development.</p> <p>Development of the Church Farm site will include the provision of a 24 acre Country Park which will provide new opportunities for leisure and recreation at the town which will have potential health benefits. Furthermore due to the proximity of the Church Farm site to the town centre and the industrial estates and the integration of the site with the surrounding footpath network this will provide a greater potential for people to walk to existing services and facilities with its associated health benefits. As such it is considered that further clarification should</p>	<p>See above</p> <p>See above</p> <p>See above</p>	<p>See above</p> <p>See above</p> <p>See above</p>

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		<p>be provided as to the justification behind the Council's assessment of the relative merits of the three sites in terms of their impacts on health.</p> <p>Objective 3 5.6 The Sustainability Appraisal concludes that the Church Farm site would have a positive impact in terms of social inclusion, whereas the Mascalls Farm site and the Mascalls Court Road are predicted to have a neutral and uncertain impact respectively. As has been highlighted previously in this report the Church Farm site is located in a highly accessible location with strong links to the town centre and the industrial estate to the north of the railway line. As such it is considered that development of the Church Farm site will enable the new community to integrate with the existing town. In addition the site will provide a percentage of affordable housing thereby helping to create a mixed community. We therefore support the conclusions of the sustainability appraisal that the development of the Church Farm site will have the most benefits in terms of social inclusion, which reflects the site's relationship with the existing town.</p> <p>Objective 4 5.7 The objective seeks to improve educational attainment and enhance the skills base. The Sustainability Appraisal assesses the Mascalls Court Road site to have a minor positive impact, whilst the other two sites are assessed to have a neutral impact. The variation in the assessment has arisen as a result of the developers proposed provision of a primary school at the Mascalls Court Road site which reflects the larger scale of the proposals for this site, although the Policy does not indicate a preferred location for the new Primary School on either the Church Farm site or the Mascalls Court Road site.</p> <p>Objective 8 5.8 Sustainability Appraisal Objective 8 seeks to reduce pollution (to land, air and soil) and greenhouse gas emissions. The Appraisal concludes that both the Church Farm site and the Mascalls Farm site would have a negative impact, whilst the Mascalls Court Road site would have a neutral impact. We are unclear on the justification for this assessment and no further detail is provided in the accompanying reports. As such we would request that further detail is provided on this matter in the Sustainability Appraisal so that the justification behind the Council's assessments is transparent. We would also highlight that the development of the Church Farm site has the potential to create lower levels of pollution due to the strong connections between the site and the town centre, railway station and industrial estates which are accessible by means other than the private car.</p> <p>Objective 9 5.9 The issue of flood risk is a particularly key issue for Paddock Wood as recognised in both the Core Strategy and the Site Allocations DPD. Objective 9 of the Sustainability Appraisal seeks to protect and</p>	<p>See above</p> <p>See above</p> <p>See above</p>	<p>See above</p> <p>See above</p> <p>See above</p>

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		<p>enhance water resources and managed flood risk and reduce the impact of flooding. In assessing the three sites, the Sustainability Appraisal concludes that the Church Farm site will have a strong negative impact, whereas the other two sites are assessed to have a small negative impact. With regards to the Church Farm site the Sustainability Appraisal states:</p> <p><i>“Although flooding issues could be mitigated for, it is unknown at this stage whether mitigation measures would outweigh the environmental harm. There are areas of both Flood Zone 2 and Flood Zone 3 on-site. There are areas of surface water flooding shown on the 1 in 30 exceedance map and on the 1 in 200 exceedance map in the Surface Water Management Plan.”</i></p> <p>5.10 As highlighted earlier in this report, the delivery of the 300 new homes will be integrated with a package of flood mitigation measures to the benefit of existing residents of the town. Without this level of housing it would not be possible to deliver the same level of benefit to the wider town as the level of mitigation works proposed would reduce in combination with the number of dwellings and as such would deliver a lesser betterment to the wider town, although the works would continue to ensure the proposed development does not result in a negative impact on the surrounding area in terms of flood risk.</p> <p>5.11 Specialist flood risk studies were undertaken to forecast the effect of our proposed drainage strategy upon reducing flooding at Paddock Wood. The reduction in the level of flood water will depend on the severity of the rainfall. Reduced flood levels will be experienced during both less severe rainfall and also during extreme rainfall events. The plan at Appendix Two of Paddock Wood illustrates the projected effect of our drainage strategy upon reducing flood levels within Paddock Wood, during an ‘extreme event’ – i.e. 1 in 100 year possibility. During an extreme flood event, flood levels would be reduced by approximately 5-10 cm over a large area of the town. In this way, our proposed drainage strategy seeks to optimise the particular advantage presented by Church Farm to significantly reduce flood levels, to the benefit of widespread areas of Paddock Wood.</p> <p>5.12 As such it is considered that the implementation of the above flood mitigation measures as part of the delivery of the 300 new homes on site will be a strong positive in terms of meeting the Council’s sustainability objective.</p> <p>Objective 10</p> <p>5.13 Sustainability Objective 10 seeks to conserve and enhance biodiversity and geodiversity. Both the Church Farm site and the Mascalls Court Road site are assessed to be a minor negative whilst the Mascalls Farm site is a strong negative in relation to this objective. In relation to the Mascalls Farm site the Sustainability Appraisal concludes:</p>	See above	See above

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		<p><i>“The site represents high negative environmental impact for natural environment and biodiversity, mainly because it has high present value, both on-site and in its immediate surroundings. It is adjacent to a Local Nature Reserve and consideration would need to be given to this in the event of any development. “</i></p> <p>5.14 We therefore support the Council’s assessment of the potential development of the Mascalls Farm site as a strong negative.</p> <p>5.15 As discussed in Section Three of this report, the Church Farm site has been the subject of detailed ecological studies to inform the development of proposals for the site. A number of recommendations have been made by our ecologists, Hankinson Duckett Associates (HDA), which have been integrated into the illustrative masterplan. In particular HDA emphasised that the provision of suitably designed new wetland habitats (both seasonal and permanent) could substantially enhance the value of the site for a number of species. It is therefore considered that development of the site could be assessed as positive against the sustainability objective given the mitigation measures proposed.</p> <p>Objective 11</p> <p>5.16 Objective 11 of the Sustainability Appraisal seeks to protect and enhance the natural and built environment and provide accessibility. Both the Church Farm and the Mascalls Farm sites are assessed to have a strong negative impact whilst the Mascalls Court Road site is assessed to have a minor negative impact.</p> <p>5.17 In relation to the Church Farm site the sustainability appraisal highlights that: <i>“development would potentially be well positioned for services and accessibility.”</i></p> <p>5.18 For the Mascalls Farm site the Appraisal states: <i>“The site represents high negative environmental impact for natural environment and biodiversity, mainly because it has high present value, both on-site and in its immediate surroundings... In addition to this, development here would represent expansion of the town beyond its present boundary, defined by the edge of housing and the B2017, a busy road for traffic entering the town from the west.”</i></p> <p>5.19 In relation to the Mascalls Court Road site, the sustainability assessment concludes that: <i>“The site represents negative potential for environmental impact for natural environment and biodiversity, mainly because it has high present value as Greenfield land.”</i></p> <p>5.20 All three sites would represent an expansion of the town beyond the existing settlement boundary however it is considered that the relative impact will vary considerably. As highlighted in the Sustainability Appraisal there is currently a clearly defined edge to the settlement to the south which the development of the Mascalls Farm</p>	See above	See above

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		<p>site would erode. In contrast, as recognised in the Council's Paddock Wood Southern Rural Fringes: Landscape and Ecological Evaluation (2012), development of the Church Farm site has the potential to: <i>"soften the edge of development and reinforce boundary features providing a new more satisfactory edge of settlement."</i></p> <p>5.21 In addition the Church Farm site is in a highly accessible location with strong links to the town centre, railway station and existing employment areas which development of the site would seek to strengthen. As such it is considered that the impact of development of the Church Farm site is not comparable to that of the Mascalls Farm site which is located in a more remote location, with poorer connections to the existing settlement and which would have a more significant impact on the surrounding landscape. As such it is considered that the Church Farm site assessment should be reconsidered to reflect the above points and should be assessed as having a neutral impact.</p> <p>Objective 12</p> <p>5.22 Objective 12 seeks to improve travel choice and reduce the need to travel, particularly by car/lorry to reduce traffic congestion. In relation to the Church Farm site we would again emphasise the strong accessibility credentials of the site and the potential to further enhance the existing linkages.</p> <p>As previously highlighted, the 2001 National Census identifies that almost a third of Paddock Wood residents work within the site. Moreover, the more recently published 2011 Census statistics confirm that a significant proportion of the population of the town (10.7%) travel to work by train whilst 7.5% of the population walk to work. These trends reinforce that the proximity of the site to the railway station, the town centre and the Industrial Estate is therefore particularly important on the basis that existing trends demonstrate that there are a high percentage of residents which seek work within the settlement and use the train or walk to their workplaces.</p> <p>Objective 14</p> <p>5.23 Objective 14 seeks to increase energy efficiency and the proportion of energy generated from renewable resources. Both the Mascalls Farm and the Mascalls Court Road sites are assessed as having a neutral impact whereas the Church Farm site is said to have an uncertain impact. We are unclear regarding the justification for this conclusion, particularly given the accessibility of the Church Farm site which will reduce the need to travel by car. As such we would request that further detail is provided on this matter in the Sustainability Appraisal so that the justification behind the Council's assessments is transparent and so Rydon Homes can seek to investigate ways to overcome this impact.</p> <p>Objective 15</p> <p>5.24 Objective 15 seeks to facilitate and support a diverse employment</p>	<p>See above</p> <p>See above</p>	<p>See above</p> <p>See above</p>

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		<p>base and sustainable economic growth. The Church Farm site is assessed to have a neutral impact, the Mascalls Farm has an uncertain impact and the Mascalls Court Road has a potential positive impact. None of the three sites are proposed to provide any employment space on site although the development of the site's themselves will lead to job creation during the construction period. It is therefore unclear as to why disparities exist between the assessed impacts of the three proposed sites. By virtue of the larger scale of the Mascalls Farm site this does have the potential to create more jobs however the whole site is unlikely to be developed in its entirety given the other constraints experienced by the site. As such further clarity is requested regarding the assessment of the three sites in relation to this objective.</p>	See above	See above
SA/AL_13	Hillreed Developments Ltd	<p>1 Introduction</p> <p>1.1 The Sustainability Appraisal (SA) document takes an overview of the social, environmental and economic dimensions of development to ensure that the most sustainable options are identified. This approach is supported. The Site Allocations Document is assisted by the Sustainability Appraisal which ensures consistency with the overarching spatial framework set by the adopted Core Strategy. For Cranbrook the spatial distribution and quantum of development must be consistent with Core Strategy CS12. The SA tests sites against the Sustainability Objectives set out at Table 2 (Page 6) of the document, whilst recognising the importance of addressing "housing need". The recognition that the main purpose of the SAD is to meet the needs of the borough as set out in the Core Strategy is supported as a key component of the planning context for the SA assessment.</p> <p>1.2 The methodology of the SA is generally supported with the testing of alternatives at Stage B before the preferred approach is further validated by an assessment of cumulative impacts and potential mitigation. The environmental significance of constraints form part of the baseline information from which options are tested. The conclusion that no adverse cumulative impacts are identified for Cranbrook satisfying S01 objective of the Site Allocations DPD is recognised and supported.</p> <p>1.3 The Sustainable Appraisal's overall conclusions that the allocation will have a beneficial impact on the main purpose of meeting housing need with minor beneficial effect on service provision, efficient use of land, transport and employment and that no cumulative impacts are predicted is supported, with minor reservations about the initial scoring in some of these areas compared with other competing sites before mitigation, which are addressed below.</p>	<p>General methodology and conclusions of no adverse cumulative impact for Cranbrook is supported.</p> <p>Support for beneficial impacts of Cranbrook allocation.</p>	<p>No amendment.</p> <p>No amendment.</p>

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		<p>1.4 Key consultees and interest groups have been involved from the start of the local plan process which further increases the robustness of the findings of the document as it has evolved.</p> <p>2 Detailed Supporting Comments on SA wording</p> <p>2.1 Under “Objective 2 -Improve Health and Reduce Inequalities”, the SA appraisal suggests that this allocation may have an adverse impact on opportunities for informal recreation. This point is also made at “Objective 18 Social Inclusion” on page 83. However, under the measures to increase sustainability the document recognises that the masterplan process will be the vehicle for securing a network of interconnected green space and structural landscaping within the layout. It is agreed that this will occur through the master plan process.</p> <p>2.2 “Objective 6-Service Provision” (page 80) could also recognise that sites 294 and 298 may have the potential for a community building if the more central sites that this use is provisionally allocated for is unable to overcome land assembly and other technical issues etc. This point applies also to “Objective 21 Service Provision”.</p> <p>2.3 “Objective 8-Pollution”. The Core Strategy identifies that Cranbrook will accommodate 300 dwellings which will necessitate greenfield releases and whichever site is selected this will generate additional traffic. The SA report suggests the impact is “uncertain”. The need to “minimise congestion on local roads arising from development” (page 81) is recognised and Hillreed/Persimmon strongly support the policy wording that the primary access off Angley Road/Hartley Road because this is an important means of achieving this objective, which would not be the case for other sites at Cranbrook.</p> <p>2.4 The only Flood Risk Zone 3 identified by Environment Agency mapping lies to the east of the town which does not affect the Policy AL/CR4 allocation. Hillreed/Persimmon recognise that provision of a Sustainable Drainage System (SUDs) is crucial in naturally controlling discharge to existing greenfield run off rates by using topography and existing watercourse channels etc to meet the Environment Agency’s requirements. This will be associated with green infrastructure which will enhance biodiversity and habitat creation and will be important matters to be addressed in the masterplanning process.</p> <p>2.5 The supporting landscape work of consultants Allen Pyke Associates highlighted the importance of shaping the masterplan process by preserving the character of the Conservation Area and</p>	<p>Agreement for dealing negative impacts.</p> <p>Support for primary access.</p> <p>Summary: Landscape Consultants should be used when formulating the masterplan. Response:</p>	<p>No amendment.</p> <p>No amendment.</p> <p>No amendment.</p>

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		<p>listed buildings and this is rightly reflected in the summary of the development potential of the adjoining Site 294 land parcel.</p> <p>2.6 The conclusion by the SA that site 298 is an accessible location is supported and the masterplan process that will follow will carefully examine pedestrian and cycle linkages with the town centre from Site 298 which will further improve existing linkages.</p> <p>3 Concern regarding the SA methodology</p> <p>3.1 The findings of the SA (Page 103) identify at the initial stage an adverse impact on objectives relating to;</p> <ul style="list-style-type: none"> • efficient use of land, • biodiversity and • the natural built environment. <p>although this would be expected to derive from the fact that the site is a greenfield release, it is notable that Site 298 and Site 294 have a double negative scores against this particular criterion but other potential greenfield sites for instance Site 318 obtain a neutral score in these areas which would suggest that a reweighting in the scoring should be applied. When the more significant benefits of wider mitigation are taken into account, the SA concludes that the above impacts will be mitigated, but it remains a concern that the initial assessment seems unduly critical of Sites 298 and Site 294 compared with the other greenfield sites.</p> <p>3.2 The SA recognises that through compliance with other policies relating to sustainable drainage/construction/energy and design etc and the safeguarding of biodiversity through the creation of a green network, all of which will be achieved via the master plan process, the effect of development focused on Site 298 can best be mitigated.</p> <p>3.3 The SA concludes that Site 294 is more sensitive to accommodate development because the axis of the conservation area runs parallel to the edge of the Crane Valley with the orientation of the water courses and the topography providing the setting of the conservation area. The SA also correctly highlights the habitat data and neutral grassland and badger sett within Site 294.</p> <p>3.4 A conclusion of TWBC's Landscape and Ecological evaluation (November 2012) was that a single large allocation on a generally well contained area that could be mitigated by structural landscaping was preferred in order to control the location and impact of a greater number of smaller allocations which would have a more significant</p>	<p>The Sustainability Appraisal is not concerned with the details of any future planning applications. This will be dealt with by the development management process.</p> <p>Summary: Inconsistent negative scoring for greenfield sites 298, 294 and 318. Response: Site 318 was scored as being allocated for recreation space not residential development thus scoring is deemed appropriate. At the stage of preparing the draft submission Sustainability Appraisal and DPD, site 318 was no longer allocated. Scoring for 298 and 294 is deemed appropriate.</p>	<p>No amendment.</p>

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		<p>impact on the existing high quality built environment and heritage of Cranbrook. This is supported by Hillreed/Persimmon. Such an approach also allows the continued safeguarding of school playing fields and recreational areas which create visual and physical permeability and therefore form an important part of the setting and character of Cranbrook.</p> <p>3.5 Overall the SA is supported with the request that the scoring system for the efficient use of land; biodiversity; and the natural built environment is applied more consistently to all of the competing greenfield land sites.</p>	General support for the scoring.	No amendment.
SA/AL_14	Beechwood Sacred Heart School	<p>We are generally in agreement with the Sustainability Appraisal, but would comment on the conclusion in the Summary Recommendations:</p> <p><i>“With careful design considerations and appropriate mitigation measures, it is possible that there could be some limited residential development to the north of the site.”</i></p> <p>As can be seen from the attached site plan, the north-western extremity of the site is a relatively narrow area of land which will accommodate the vehicular access to the site.</p> <p>The site widens out to the south-east of this, and it is in this area that the majority of the development could be accommodated.</p> <p>This wider area is the least constrained part of the site, not being within Green Belt, Area of Landscape Importance or Important Landscape Approach.</p> <p>Although the topography slopes down towards the south-east, we have demonstrated, through our pre-application submissions, that this part of the site can be developed.</p> <p>We would, therefore, seek a revision to the Sustainability Appraisal, as follows:</p> <p><i>“With careful design considerations and appropriate mitigation measures, it is possible that there could be residential development within the site.”</i></p>		<p><u>No amendment:</u> This should be noted for the Allocations DPD and considered further.</p>
SA/AL_15	Natural England	I have no comments on the SA, except that the indicators for SA Objectives 10 and 11 rely on periodic reviews. Consideration should be		<u>No amendment</u>

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		given to monitoring the impact of allocations and consents, such that the impact of the plan can be considered. This may involve collecting data such as the area and scale of development implemented against the advice of the AONB Unit, or where there is loss or gain of landscape quality or of BAP habitat.		
SA/AL_16	High Weald AONB Unit reedited comments from 3 rd June 2013	<p>Overall the impacts of the proposed allocations on the AONB do not appear to have been consistently assessed, and the process by which the choices of sites have been made are not transparent. The criteria or assessment of impacts, and the evidence base is limited and inaccessible. Overall the process and methodology behind the site selection, and the justification for the allocation of greenfield sites within a nationally designated landscape is not transparent or clearly explained. The Sustainability Appraisal (SA) is itself in draft and the weight attached to this as part of the evidence base is consequently reduced. This is important as the SA is the only part of the evidence base that provides systematic analysis of site impacts. The Site Templates are descriptive and largely factual reports on the sites and do not provide criteria, constraints or other objective analysis to assess the sites suitability. They largely conclude with statements like 'Nevertheless it is considered suitable for allocation.' without explaining why or how that decision has been reached, or what criteria the choice has been based on. The Landscape Evaluation Reports provide a factual review of the site and some additional data (reference to Unit data is appreciated). However they lack clear methodology and the conclusions are not clearly linked to the information provided. The DPD does not include reference to or mention the High Weald AONB Management Plan, nor assess the impacts on natural beauty in line with that management plan. Overall the lack of reference to the importance and status of the AONB in the DPD is disappointing and a serious omission.</p> <p>In general terms the draft Site Allocations DPD fails to make appropriate assessments of the impacts on and threats to the AONB represented by the proposed site allocations. There is no transparent methodology applied to the site selection process. A number of sites are proposed for allocation within the nationally designated High Weald AONB, but the impacts on and loss of greenfield AONB has not been clearly and consistently assessed. As these sites are being allocated in a strategic policy document they have a significant status, and at least one site is large enough to be considered 'major' on its own</p>	<p>Summary: Process for choosing sites overall is unclear. A draft Sustainability Appraisal has reduced weight. General methodology is inconsistent and summary comments not detailed enough. More reference to the AONB is required in general.</p> <p>Response: Noted and accept that greater clarity on how sites have been selected would be beneficial. However, full regard has been given to the requirements of the National Planning Policy Framework throughout and the approach contained within para 116 of that document. It is also not agreed that the Site Allocations DPD fails to recognise the importance of the impact on the Area of Outstanding Natural Beauty (AONB) under Section 85 of the Countryside and Rights of Way Act.</p> <p>There is frequent reference to the AONB within the document but where development is identified in the Core Strategy as required within Cranbrook and Hawkhurst, both wholly within the AONB, any development proposal will have an impact on the AONB. It is accepted that clarity as to why the specific sites have been chosen would be beneficial but the principle of development in these locations has already been agreed.</p> <p>The Sustainability Appraisal process is draft at this stage in the process as is the Development Plan Document itself so it is not accepted that this in any way diminishes the relevance of either document. National Planning Practice Guidance states that the local planning</p>	<p><u>Amendments to DPD:</u> Add clarity to Chapter 2: Methodology and Strategy regarding site selection to ensure the process is clearer.</p> <p>Add more detailed explanation to Chapter 1: Introduction regarding the role of sustainability appraisal.</p>

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		<p>merits, but even the smaller sites though not 'major' in size or numbers terms have a status as allocations. Given that status, the approach defined in para 116 of the National Planning Policy Framework, for assessing impact of major development on the AONB would provide an appropriate method to assessing the impact of these sites on the High Weald. Para 2.4 of the DPD provides an overview of the 'methodology.' The first filter stage at stage 4 included at; "3. Sites with a significant negative impact on nationally and internationally important nature conservation sites and landscape designations" There is no evidence or demonstration of how or where this assessment was made, and no consultation in regard to potentially significant sites. It is our view that the effects on the AONB have not been fully considered and the method used to select sites is neither transparent or clear. In this respect, the Site Allocations DPD does not meet the duty under Section 85 of the Countryside and Rights of Way Act, to have regard to the AONB.</p> <p>Land off Highgate Hill, Hawkhurst (Site number 356 & 357) The site allocation will impact on key components of natural beauty (objective FH2 and R1) identified by the High Weald AONB Management Plan. The site is bounded by historic field boundaries with historic map evidence showing lost boundaries within the site. The site is part of a wider historic pattern of small irregular fields that have survived intact to modern times. The site has extensive views and is open to the wider landscape to the south, and is highly representative of the character of the High Weald. The loss of landscape character which will result from the development of this site will be a significant impact on the AONB, as will the actual physical loss of the site to built development. The Sustainability Appraisal examines this site in two parts (sites 356 and 357) and it is noted that both have biodiversity and natural environment impacts, but these are more acute for site 357. The sites are combined under allocation HA2 without apparently taking full consideration of the severe impacts on biodiversity and the natural environment. Taking a precautionary approach the whole site should be assessed under the SA at the worst case impact of a 'double negative' score for natural environment. The landscape impacts of this development are significant, and these impacts are not fully accounted for by the site template.</p>	<p>authority may want to consult on the Sustainability Appraisal as part of the development of the Local Plan document itself. The Sustainability Appraisal report, including the non-technical summary, must be published alongside the draft Local Plan document for a minimum of six weeks.</p> <p>The Site Templates are there to assist with understanding of the site selection process and will not form part of the final Submission DPD.</p> <p>Sites 356, 357 and Policy AL/HA2 (below) AONB not fully considered. No land use justification for site choices. Landscape issues treated as secondary considerations.</p> <p>Response to Land off Highgate Hill, Hawkhurst (Site number 356 & 357) and Policy AL/HA2 comments: The justification for the allocation of site 356 and 357 is set out within the Site Templates as part of this consultation. It is recognised within these that the site is within a sensitive location and therefore if development is permitted then it would need to meet a number of criteria as set out within Policy AL/HA 2. These primarily relate to the fact that the site falls within the AONB and that therefore any development should provide a strong landscape framework and be informed by a detailed landscape and visual assessment as well as an ecological</p>	<p><u>No amendment.</u> The site has already been scored double negative for the natural/built environment objective.</p> <p><u>Amendment proposed to SA:</u> The matrices have been marked for sites 333, 356 and 357 to reflect their high natural environment value. However, it is not stressed in the text that they fall within the AONB. Text needs to be added to the matrices for sites 333, 356 and 357 as follows: "This site lies entirely within the High Weald AONB, which washes over the settlement of Hawkhurst"</p>

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		<p>However the principle concern related to this release is that there is no land use justification for the land release, simply a circular argument based on the Core Strategy, Core Policy 1(1). This allows for the release of selected Greenfield sites adjacent to the LBD of small rural towns to maintain a supply of developable land. There is no other criteria or justification attached to this policy. In the site allocation DPD appendix 1 (area templates) the site release is solely justified by reference to Core Policy 1, but this applies equally and indiscriminately to any piece of land adjacent to the LBD. The commentary on this site recognises the sensitivity and high quality and character of the site. The site template notes in the Analysis/Suitability section that Core Policy allows that the site <i>may</i> be considered under Core Policy 1 (although claims it meets some criteria which do not in fact exist, CP1 contains no criteria against which to judge whether this site may or may not be suitable). Thus the site is “suitable” because it comes under CP, therefore it can be allocated. Simply stating that it is suitable, does not make it so. The same statement can be made for any and all pieces of land that abut the built up edge of Hawkhurst. This is simply not adequate explanation or justification for a significant greenfield release within the AONB.</p> <p>There is no process or criteria applied to the site selection, no analysis of the site suitability, its characteristic, nor of the impacts or effects that development on the site will cause to the townscape, the conservation area and the AONB in which it sits. The Template simply baldly states that despite the sites sensitivity, character and inherent quality, that “nevertheless it is considered suitable”. The approach taken in fact appears to leap over all normal land use issues and impacts, by justifying the land release on the basis of CP1 which actually allows for the consideration of a sites potential, it does not justify its allocation contrary to all other normal planning constraints. The development will have significant and detrimental impacts on the High Weald AONB, not least through the physical loss of and destruction of undeveloped green space, the loss of and total change of character of the site from undeveloped grazing land to developed urban form, which will extend the boundary of Hawkhurst further into the AONB.</p> <p>Policy AL/HA2 Policy HA2 appears to refer to a list of criteria for the development</p>	<p>assessment.</p> <p>All sites assessed as part of the plan preparation process underwent a rigorous assessment as set out within the Methodology and Strategy chapter of the Site Allocations DPD. Table 1, sets out in detail the stages of the site assessment process and how each site has been assessed. It also outlines the approach taken by the Sustainability Appraisal and how this has fed in to the site assessment process. A cumulative assessment has also been carried out for each settlement.</p> <p>All of these issues were assessed as part of the site selection process in order to select this site for allocation as opposed to other sites within Hawkhurst. It is necessary to include reference to these considerations as part of the policy wording in order to ensure that such issues are considered as part of any future planning application. If such issues are not taken into account by a future planning application then it would not be supported by the Council. By including reference to landscape, ecology, significant trees etc, it will ensure that these issues are taken into account so that the development does not have a significant impact on the AONB in this location.</p> <p>Sites 356 and 357 (Land off Highgate Hill) are now the subject of an outline planning application (13/02828 – Amended Description) for 62 dwellings, access, parking, garages and hard and soft landscaping. This was submitted in September 2013 and is currently pending consideration with a target decision date of the 30 July 2014.</p>	

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		<p>which should actually have already been assessed as part of the DPD process. By including them in the policy which has already determined the principle of development on the site, these essential criteria are relegated to secondary considerations in the site assessment. Once allocated planning permission is almost automatic. Therefore all these critical site issues will only be considered once development is assured. The landscape and visual impacts, ecological assessment, green infrastructure and planting issues should be considered as part of the overall site suitability and the impacts on them weighed against the need for the development. By treating them as secondary considerations in the process they have already been relegated to mitigation and compensatory matters. Additionally the site is already an extant semi-natural site, well established which makes a significant contribution to the urban rural edge and already delivers extensive and well established green infrastructure, developed natural planting and tree growth and good public access. The development of the site can only reduce and harm these existing assets and natural services, which can hardly be enhanced over their existing highest status. This is highest quality nationally designated landscape in good condition, which provides all the elements and services that the policy seeks to enhance or add too. The development can only reduce this level of semi-natural space and natural services that it currently, already provides. This is not an enhancement but a detrimental impact.</p> <p>Policy AL/HA3 Birchfield, Rye Road (Site 333)</p> <p>The site allocation will impact on the natural beauty of the AONB under the High Weald AONB Management Plan. The loss of landscape character which will result from the development of this site will be a significant impact on the AONB, as will the actual physical loss of the site to built development. The site is historically part of the estate of the neighbouring Fowlers Park listed building and is representative of large estate formal landscapes, and is potentially locally distinctive. The sites development would extend the urban edge of Hawkhurst further west to beyond the eastern edge of Fowlers Park to the detriment of the wider rural landscape.</p> <p>The Sustainability Appraisal identifies severe biodiversity and natural environment impacts. Taking a precautionary approach the site should be assessed given the worst case impact of a 'double negative' score</p>	<p>Summary: Site 333 should score double negative for natural/built environment objective. Significant impact not adequately accounted for. Choice of site not justified.</p> <p>Response: The Local Planning Authority has allocated Birchfield (Site AL/HA 3) for approximately 25 dwellings after careful consideration of the site. It is considered that although there would be some negative impacts of developing this site, a well screened and low density development could be achieved in close proximity to shops and services on Rye Road and the centre of the village. The Limits to Built Development of</p>	No amendment.

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		<p>for natural environment. The SA notes other significant impacts on the site which are not adequately accounted for in the assessment. The site is also contrary to Core Strategy Policy CP1, which has been extensively referred to regarding other sites. This allows consideration of sites that are adjacent to the LBD and a range of other sites have been rejected on this basis. An exception has been made in this case with no clear justification or land use reason. It is not clear on what basis this assessment has been made, other than it is considered suitable. The same statement can be made for any and all pieces of land that abut the built up edge of Hawkhurst. This is not an adequate justification for a significant greenfield release within the AONB. The development will have significant and detrimental impacts on the High Weald AONB, not least through the physical loss of and destruction of undeveloped green space, the loss of and total change of character of the site from undeveloped grazing land to developed urban form.</p> <p>Policy AL/HA3 Policy HA3 appears to refer to a list of criteria for the development which should actually have already been assessed as part of the DPD process. By including them in the policy which has already determined the principle of development on the site, these essential criteria are relegated to secondary considerations in the site assessment. Once allocated planning permission is almost automatic. Therefore all these critical site issues will only be considered once development is assured. The landscape and visual impacts, and landscaping issues should be considered as part of the overall site suitability and the impacts on them weighed against the need for the development. By treating them as secondary considerations in the process they have already been relegated to mitigation and compensatory matters. It is considered unreasonable to require the retention of future access to the north as development in this further location (see site 64) has been rejected as being suitable for development. It is therefore seeking to safeguard the potential for future development, which is rejected in the same document. Leaving the 'door open' in this way may compromise the future conservation and enhancement of natural beauty, by retaining the possibility of future development. This does not provide certainty over the future development options in the area.</p>	<p>Hawkhurst will be extended in this location north of Rye Road to encompass the existing development and the proposed allocation. Policy AL/HA 3 sets out development parameters which should be adhered to in order to respect the site and surroundings; including any development should be supported by a strong landscape framework, should respect the setting of the Listed buildings at Fowlers Park, maintenance and enhancement of the landscaped boundaries of the site.</p> <p>Further criteria has been added to the policy wording to reflect the importance and consideration of the unique landscape of the AONB in any new development on this site.</p> <p>Summary: Criteria are secondary considerations only.</p> <p>Response: The criteria set out within Policy AL/HA3 will ensure that development of the site is carried out within an appropriate and sensitive way. The issues raised have been assessed as part of the site assessment, but need to be reiterated within the policy to ensure that all of these issues are taken into account to direct development. Draft Policy AL/HA3 states " <i>development must not compromise the possibility of future access to land to the north.</i> " The draft text to the DPD adds (at paragraph 7.24) that: " <i>It is possible that land to the north of Birchfield, Rye Road could provide an appropriate location to contribute to the development needs of Hawkhurst after the end of the Plan period (post 2026). It is therefore proposed that any development of the Birchfield site should not jeopardise access to land to the north. However, it should be emphasised that the allocation of sites for the post-2026 period would depend on a housing requirement for</i></p>	No amendment.

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		<p>Cranbrook (general)</p> <p>The Site Allocations DPD does not appear to properly reflect the development guidelines in the Core Strategy. Core Policy 12 (1) states that all new development “will have particular regard to” the setting of the town in the AONB. Under para 5.254 it states that “Cranbrook will not experience significant growth, but new development for small scale market and affordable housing.” Para 5.254 concludes that “A Town Centre Area Action Plan will be produced for Cranbrook where significant change of conservation is necessary.” Under para 5.255 it also states that “housing delivery will encompass small-scale market and affordable housing.... to meet local needs”. The Core Strategy approach clearly indicates small scale, incremental growth of developments that can be assimilated into the particularly sensitive and high quality village environment. The importance of the AONB designation across the settlement is clearly and appropriately highlighted and the impacts of development on the village itself and its closely associated rural environment is indicated. Any significant change and impacts on conservation should be managed and guided by an area action plan to ensure that the conservation and enhancement of the local environment and the impacts on the AONB landscape are fully reflected and protected. This recognises the high quality and very sensitive character of the village and its environs, and the limited capacity for the area to absorb new development on anything other than a small scale incremental, approach.</p> <p>This sensible and credible approach to development in Cranbrook is not reflected or even referenced correctly by the Site Allocation DPD,</p>	<p><i>Hawkhurst being identified in a future review of the Plan and an assessment of available sites following this review.</i> ”</p> <p>The inclusion of this requirement within Policy AL/HA3 does not imply that planning permission would be granted for all or any part of the land to the north; this would depend on a future housing requirement being identified and an assessment of all other available sites in a Plan review. It is considered that this approach remains valid.</p> <p>Summary: Development in Cranbrook not sensible or credible.</p> <p>Response: Core Policy 12 of the Core Strategy (Development in Cranbrook), sets out that approximately 300 net additional dwellings will be delivered on sites to be allocated in Cranbrook. The Council is seeking through the Site Allocations DPD to provide for the remaining requirement of Core Policy 12 for the period to 2026.</p> <p>The Council has followed a methodology of site assessment that has included consideration of impacts on landscape and the Area of Outstanding Natural Beauty (AONB), and has included the publication of a Landscape and Ecological Evaluation for Cranbrook. The Site Allocations DPD follows from the adopted Core Strategy which identifies Cranbrook as a sustainable location for new development, although the town is wholly within the AONB. It is considered that the Council has adopted a robust approach to site selection which has included a Landscape and Ecological Evaluation assessing broad locations for growth around the town. However, it is accepted that greater clarity on the methodology of the site selection process would be beneficial. It is therefore proposed</p>	<p><u>Amendments to DPD:</u> Amend Chapter 2: Methodology and Strategy to provide further clarification of site selection process.</p>

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		<p>which only refers to the need to strengthen the character of the town, and the setting of the AONB. On a side note it should be made clear that the impacts on the AONB in this location are not a 'setting' issue. The town is not within the 'setting' of the AONB in the normal planning sense – the town is fully within the AONB and any and all impacts are directly on the AONB, and all development should seek to conserve and enhance the Natural Beauty, which is nationally designated, equivalent to a National Park. The DPD does not translate this clear vision for the development of Cranbrook into related and connected site policy, nor does it deliver the Core Strategy direction for Cranbrook. Its response to providing small scale development that has particular regard to the historic town and its location within the AONB, avoiding significant growth, and managing any change through an area action plan, is too allocate a single large site, a 'major' development in AONB terms, on the most sensitive and vulnerable location, on greenfield land within the AONB. Detailed commentary on the major site allocation will follow, but the issue here is that the overall approach to the delivery of development in the DPD does not reflect or follow the policy set out in the Core Strategy and is thus fundamentally flawed.</p> <p>Policy AL/CR6 Wilkes Field (site 11)</p> <p>The site allocation will impact on the natural beauty of the AONB under the High Weald AONB Management Plan. The loss of landscape character which will result from the development of this site will be a severe impact on the AONB, as will the actual physical loss of the site to built development. The site has strong historic associations with the built edge of the town and is extant on the earliest historic mapping as an integral part of the townscape. The historic village core of Cranbrook is a linear street form characterised by large single frontage developments facing the street scene with extensive working and open space behind the single frontage. The historic core clearly and superbly retains this single frontage depth along its length, and the open spaces, yards and backs to the frontage are a significant element of the street scene. Wilkes Field is part of and a major contributor to this pattern and structure of the historic village core. Development of the area will remove this rear area open character and enclose a significant space on two frontages where the High Street and Stone Street intersect. This will impact on the conservation area and historic</p>	<p>that additional text be added to Chapter 2: Methodology and Strategy of the DPD to explain the site selection process, particularly as it relates to national guidance on AONBs. Regarding the Town Centres Area Action Plan, the Council has resolved not to proceed with a separate DPD for the main centres in the Borough, but to include considerations of development within the town centres within the Site Allocations DPD itself.</p> <p>Regarding the allocation proposed under Policy AL/CR4 (Land adjacent to Crane Valley and Land south of High Street and east of Orchard Way), it is proposed that a masterplan be prepared for this area to include design and landscape considerations.</p> <p>Summary: Development will affect local character and loss of connected green space.</p> <p>Response: These comments have been noted. The details of how this site would be developed will be dealt with through the planning application process and would need to comply with the broad requirements set out in Policy AL/CR6. These requirements take account of the site's location adjacent to a Conservation Area and the Crane Valley. The Site Allocations DPD follows from the adopted Core Strategy which identifies Cranbrook as a sustainable location for new development, although the town is wholly within the AONB. It is considered that the Council has adopted a robust approach to site selection which has included a Landscape and Ecological Evaluation assessing broad locations for growth around the town. However,</p>	<p><u>Amendment to DPD:</u> Additional text will be added to Chapter 2: Methodology and Strategy of the DPD to explain the site selection process, particularly as it relates to national guidance on AONBs.</p>

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		<p>scene and also on the character of the AONB where Wilkes field contributes to the settlement character of the area and makes a major contribution to the interaction of the village with the wider environment in which it sits. Wilkes field also relates to and connects the village edge with the Crane Brook and links up the green infrastructure elements in this location. This has major amenity value and development of this site will lead to a severe loss of connected green space and natural environment that forms an informal and semi-natural merged edge of the village and rural environment in a unique way. Development of the site would compress the natural green space corridor, effectively linking up the Co-op car park with Stone Street and severely reducing the semi rural and natural qualities of the environment of the village.</p> <p>Policy AL/CR4 Land adjacent Crane Valley The site allocation will impact on the natural beauty of the AONB and will affect the components of natural beauty identified by the High Weald AONB Management Plan 2004. The site should be considered as a major development under the National Planning Policy Framework (NPPF) and as such has not been adequately assessed under the major development test (para 116 of the NPPF). The allocation is contrary to the Core Strategy development strategy for Cranbrook. The development will have wide ranging and extensive impacts on the natural environment and landscape of the Crane Valley and the historic settlement of Cranbrook, and will impact on the natural beauty of the area. The Councils own information and supporting documents (Cranbrook Site Templates, Sustainability appraisal and Landscape and ecological assessment) all recognise the high quality and sensitive nature of the site.</p> <p>The sustainability appraisal scores both the sites with double negatives on biodiversity, natural and built environment, negative on flood risk, double negative on efficient land use and neutral or unknown on all other factors. The site template acknowledges that the site has “fundamental constraints” The landscape and ecological assessment notes the presence of several protected species and very high ecological value. In AONB landscape terms the site is a highly</p>	<p>it is accepted that greater clarity on the methodology of the site selection process would be beneficial. It is therefore proposed that additional text be added to Chapter 2: Methodology and Strategy of the DPD to explain the site selection process, particularly as it relates to national guidance on AONBs (see also Section 5 of Item 3a).</p> <p>Summary: Site allocation will impact upon the natural beauty of the AONB and site selection in general is flawed.</p> <p>Response: These comments have been noted. The Site Allocations DPD follows from the adopted Core Strategy which identifies Cranbrook as a sustainable location for new development, although the town is wholly within the AONB. It is considered that the Council has adopted a robust approach to site selection which has included a Landscape and Ecological Evaluation assessing broad locations for growth around the town. However, it is accepted that greater clarity on the methodology of the site selection process would be beneficial. It is therefore proposed that additional text be added to Chapter 2: Methodology and Strategy of the DPD to explain the site selection process, particularly as it relates to national guidance on AONBs.</p>	<p><u>Amendment to DPD:</u> Additional text will be added to Chapter 2: Methodology and Strategy of the DPD to explain the site selection process.</p>

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		<p>representative example of the character of the High Weald and encompasses many elements or components of natural beauty. The site is part of a larger pattern of small irregular fields, bounded by ancient woodland, including a gill stream, set in a distinctive geology, well related to the settlement pattern of the High Weald, including an historic farmstead, and the adjacent and interrelated historic village core of Cranbrook. The high street to the northern boundary is an historic routeway.</p> <p>The “range of hedgerows, wooded shaws and trees across the site that give rise to a rather intricate field pattern series of ponds, springs....” referred to in the landscape and ecological evaluation is a clear description of the qualities of natural beauty identified by the High Weald AONB Management Plan. The pits or excavations relating to the brick kiln are also a contributory locally distinctive element that shows how the land has been exploited and managed in the past and a testament to the geology and resources that the landscape provided in the past. These elements of land management are fundamental to the understanding of the natural beauty of the High Weald, which is a managed landscape that has a very high level of surviving medieval features and character that are dependent on traditional land management. This landscape is typical of that inherited medieval character. The site, its field boundaries, pattern and features are clearly visible on the earliest historic mapping and this area has a historic depth, relating to medieval times. This historic inheritance is very closely related and connected to historic core of Cranbrook of which it is a related and integral feature in the landscape. The site is visually very prominent and makes a significant contribution to and is an integral element of Cranbrook within the wider environment and AONB.</p> <p>In policy terms the site selection is flawed, as the site should be considered as a major development in terms of the NPPF para 116 and the associated major development test. A site allocated in a strategic planning document, particularly of this size, making a significant contribution to the housing supply, must logically constitute a major development (ref Wealden District Council Core Strategy examination – PINS/C1435/429/4 – para 83 – “<i>In this context, a residential development of the scale proposed (160 houses), considered by the</i></p>		

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		<p><i>Council to be a strategic provision, must be regarded as major.”)</i></p> <p>On this basis the site has not been subject to the major development test in a rigorous and thorough manner and is consequently flawed and fails against national policy. Essentially such a major development should not take place and there are no exceptional circumstances to justify such a significant large greenfield land release. In particular under bullet 2 of the tests, the level of housing could be achieved in a more sensitive and appropriate way on other sites (in line with the Core Strategy approach) rather than on a single large site with such significant impacts. At the very least (as in the Wealden example) the Council have failed to undertake the assessment required and the allocation fails on that basis. The sustainability appraisal is over whelming negative, and the landscape appraisal incomplete or equivocal. None of the documents make a clear statement or appraisal of the impacts of the allocation on the AONB. The DPD does not refer to the High Weald AONB Management Plan. The site templates are largely negative and highlight the issues and constraints on the sites. The only justification given is that the site is well located in relation to the services in Cranbrook, but assuming that the Core Strategy policy CP1 approach used elsewhere (development adjacent the LBD can be considered) then any other sites would also be as well or better located. This is not an adequate basis on which to make this allocation. The site allocation is not justified, is contrary to national policy under para 116 of the NPPF, contrary to the Core Strategy policy CP12 (and supporting text). The site will have significant and extensive impacts on the AONB, leading to the total physical loss of a large area of landscape, complete loss of and change in the character of the area, directly and indirectly affect a range of features and designations (local nature reserve, ancient woodland). These impacts are considered unacceptable especially given the failure to apply the major test.</p>		
	Mr PHJ Smith	<p>I am surprised and disappointed by many of the proposals and statements made the document ‘Site Allocations – Development Plan Document Consultation Draft’ [SA-DPD-CDft] in relation to the proposal to build up to 650 houses in Paddock Wood.</p> <p>I am concerned because the infrastructure in Paddock will not be able to cope with the people and vehicles that these 650 houses will bring to the town. Neither are there adequate proposals for extra school places, more parking, and wider roads in the SA-DPD-CDft documentation.</p>	<p>Summary: Respondent is concerned that existing infrastructure will not support the new growth.</p> <p>Response: The Highways Agency states that it has no ‘in principle’ objections to the DPD. However, some concern is expressed about the quantity of development in Royal Tunbridge Wells, and the Agency has stated that it wishes to see analysis of traffic impacts as plans for the allocated areas and sites are developed and the Council’s approach to parking emerges</p>	

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		<p>Secondly, I am concerned that the consideration of the three sites proposed in Paddock Wood is tendentious. For reasons which I cannot understand, the site at Mascalls Farm is being discounted without serious or proper consideration and the reasons given in the SA-DPD-CDft documentation seem ill founded. Why is this, and what is the Tunbridge Wells Borough Council's [TWBC] explanation for this lack of proper consideration?</p> <p><u>INFRASTRUCTURE.</u></p> <p>I am concerned that the infrastructure within Paddock Wood will be unable to accommodate a further 650 houses and the people and vehicles that they will bring. My particular concerns are:</p> <p><u>Drainage.</u> The low lying land in the areas earmarked for the Church Farm and Mascalls Court Farm developments cannot be very much higher than the water table. There is much verbiage about the need to 'resolve existing and arising flooding issues' but a marked absence of mitigation proposals. What studies have the Borough and County Councils conducted to ensure that there will be adequate provision for drainage, and the disposal of waste water and sewage? Surely these studies must demonstrate conclusively what is required to guarantee that there will be no risk to public health and that the drainage provision will be sufficient. These enhancements must surely be completed before <u>ANY</u> major construction of new dwellings on those sites can commence. Will TWBC guarantee that such enhancements be completed before the house building commences? Is the Developer going to pay or contribute towards the costs of any additional sewage and waste water disposal facilities? Or is it TWBC's intention that the existing Council Tax payers or residents should pick up the bill for such enhancements? Would the purchasers of houses on these sites be able to insure their homes against flooding?</p> <p><u>Schools.</u> The proposed development will place further demand on the local schools. What guarantee can TWBC give that there will be sufficient places in the local primary and secondary school to accommodate the influx of children which the proposed development will bring to the area? There is only passing reference to a further primary school at Mascalls Court Farm but no mention of timescale for the build, capacity, provision of parking spaces and the improvement of vehicular access in Mascalls Court Road so the children can be</p>	<p>through the new Parking Strategy. The Council will involve the Highways Agency in further work on the DPD and Masterplans for the town centre sites and is working with Kent County Council on transport modelling to inform the Submission Draft DPD. Given this, it is proposed that no amendments are made in response to these comments.</p> <p>Summary: Respondent is concerned about drainage, flooding and mitigation proposals.</p> <p>Response: The purpose of the sustainability appraisal is to identify potential negative impacts and to ensure that these are mitigated for. However, detailed mitigation measures should be considered through the Development Management process and individual planning applications. Given this, it is proposed that no amendments are made in response to these comments.</p> <p>Summary: Respondent is concerned about supporting school provision in Paddock Wood.</p> <p>Response: TWBC is working with KCC, in order to identify areas of school growth and appropriate allocation sites where school provision can be included.</p>	<p><u>No amendment</u></p> <p><u>No amendment</u></p> <p><u>No amendment</u></p>

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		<p>delivered and collected without risk to pedestrians or traffic congestion. What measures are planned to mitigate the significant noise and air pollution to the existing housing which a new primary school would bring. If there is insufficient capacity for further children at the local schools, where will children from these new developments go? If they have to travel to alternative schools outside Paddock Wood this will place further strain on the local roads as they are driven to and from school. Despite optimistic claims about footpaths and cycle ways to school, a single visit to Capel Primary School in Five Oak Green will provide a compelling demonstration of the traffic chaos and confusion that results when children are driven to a school where there is no parking provision and the road system is woefully inadequate. Surely before any building commences provision must be made by the County Council for sufficient schools in the local area to accommodate the children of the people who will buy these houses?</p> <p>Parking. What provision is planned to provide parking to accommodate the vehicles which will appear with the residents of these 650 houses? The developers are anxious to stress lots of good news about off road parking and garages, but quite obviously the vehicles will not remain exclusively on these developments and will be used to drive into and through Paddock Wood.</p> <p>One of the attractions of Paddock Wood is the excellent train links to central London and thus it might be assumed that this will place further strain on the parking available at or near the railway station. What provision is TWBC making to ensure that there will be parking available to meet any increased demand so that the alternative of ingenious commuters employing imaginative parking strategies does not disrupt or inconvenience the residents of the town? Will the provision of parking spaces be 'outsourced'/left to Southeast Trains so that any parking revenues do not benefit the residents of the area but instead swell the dividends of French(?) shareholders?</p> <p>Currently, Mascalls Court Road is severely congested by parents depositing and collecting their children from Mascalls School. There is currently a problem due to the lack of parking near the school. This will only get worse if the number of pupils is increased. Additionally, one must anticipate a much greater volume of traffic on Mascalls Court Road as a result of any building on either of the Church Farm and Mascalls Court Farm developments. If the proposed primary school is constructed on Mascalls Court Road then the problems will be</p>	<p>Summary: Concern over parking, congestion and increase in traffic</p> <p>Response: See earlier response above regarding parking and transport issues.</p>	<p><u>No amendment</u></p>

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		<p>multiplied even more! What provision will be made for the widening of Mascalls Court Road to accommodate this increase in traffic?</p> <p>The parking available in the town centre is inadequate for the current usage and leads to inconsiderate parking in Commercial Road and resulting congestion at the bottom end of that road. What provision is planned by the TWBC for further public parking in the town centre (ie not courtesy of SouthEastern Railways or Waitrose)? The 'commercial development' of Site 244 suggests maintaining 'the same level of parking as is currently provided' but surely the building of a further 650 houses will lead to increased demand on the already inadequate parking provision?</p> <p>Consideration of Sites 220 and 244 both make reference to a 'convenience foodstore'. Is this a euphemism for a larger Tesco? If TWBC allow Tesco to expand, one of the likely consequences is that the existing Waitrose will start to charge for its parking (possibly refunded if you spend sufficient money in Waitrose). This would be in order to prevent its car park being used by people shopping in Tesco. The expansion of Tesco (who refused to provide Post Office services in Paddock Wood when they opened their current store) will not only affect parking provision and convenience in Paddock Wood but will have a negative effect on the other traders. Why do TWBC consider a second supermarket is needed in Paddock Wood?</p> <p><u>Local Road System.</u> The local road system is inadequate for the current volume of traffic. The building of a substantial number of homes on either the Church Farm or Mascalls Court Farm developments will place further burdens on the road system and in particular will turn Warrington Road and Green Lane into 'rat runs' with the attendant road safety problems. The delivery of building materials during the construction of any homes on those two sites will place further demands on these already congested roads and particularly on Mascalls Court Road near Mascalls School. If either of those two sites is seriously considered for part of this new development then I suggest that the straightening and widening of Mascalls Court Road from its junction with Maidstone Road to where it joins Church Road is an essential first step before any building should commence.</p> <p><u>APPENDIX 1- SITE TEMPLATES PADDOCK WOOD.</u></p> <p>The consideration of the three proposed sites for residential housing in Paddock Wood is tendentious and discards Site 219 (Mascalls Farm) without any particularly good reason for so doing.</p>	<p>Summary: Respondent is concerned about the involvement of major supermarket chains in the development process.</p> <p>Response: Supermarkets have an opportunity to respond to this consultation process in the same way as other stakeholders and their responses will be considered in the same way as other stakeholders.</p> <p>Summary: Site 219 is not scored correctly compared to site 1007 and 218.</p> <p>Response:</p>	<p><u>No amendment</u></p>

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		<p>Site 219 is considered unsuitable because 'it is severely constrained in landscape and ecological terms and is not considered to be an appropriate extension to Paddock Wood'.</p> <p>Site 219 is no more constrained in landscape and ecological terms than either Site 218 (Church Farm) or Site 1007 (Mascalls Court Farm). Indeed, since Site 219 is constrained by neither the railway line nor the flood plain it is hard to understand why TWBC should imagine Site 218 is preferable?</p> <p>In the 'Sustainability Appraisal', like Site 1007, Site 219 'scores' negative impacts for natural environment, land use and biodiversity however, Site 1007 also has 'flooding constraints which will need to be mitigated'. Why then does TWBC consider Site 1007 to be preferable to Site 219?</p> <p>'Core Policy 11: Development in Paddock Wood establishes that an urban extension to the town will need to be delivered.' Would TWBC please explain and enumerate their criteria for 'an appropriate extension to Paddock Wood'. Then can they explain why Site 219 does not meet these criteria while Sites 218 and 1007 do?</p> <p>What Appendix 1 to the SA-DPD-CDft fails to consider are the superior transport links and vehicular access which Site 219 enjoys.</p> <p>This site is adjacent to the B2017 with access to both A228 and B2160 without adding traffic congestion to the town centre and the existing road infrastructure. In contrast, Sites 218 and 1007 cannot reach any of these three roads without first passing through the town. In particular this will inevitably turn Warrington Road and Green Lane into 'rat runs'. If TWBC select these other sites, what provision will be included to prevent these residential roads being used as shortcuts to the main roads with all the attendant road safety risks to pedestrians?</p> <p>Site 219 is on existing bus routes (unlike Sites 218 and 1007). Surely it will be more attractive to the bus companies if they have higher occupancy rates on their existing routes rather than having to provide more services – they also have to make profits!</p> <p>The direct vehicle access to Paddock Wood railway station from Site 219 will provide a smaller impact on the road infrastructure than the routes from the other two sites</p> <p>There is also unsupported emphasis placed on the possible impact on the 'established population of dormice'. This is not demonstrated, and</p>	<p>Site 219 is more constrained in both landscape and ecological terms than site 218 and 1007, in particular in relation to protected species, proximity to the AONB and rising topography. It also follows that site 219 is therefore a less appropriate urban extension site for Paddock Wood.</p> <p>Summary: Site 219 has superior transport links and vehicle access.</p> <p>Response: The transport objective also needs to consider pedestrian links and access to services, in addition to existing road infrastructure. Site 219 is not well connected in that a busy main road divides the site from the residential area of the town centre and the site is less geographically continuous from the town centre, its boundaries and its services. Appropriate and safe access to this busy road would need to be provided.</p> <p>Summary: Unsupported emphasis on the impact of</p>	<p><u>No amendment</u></p> <p><u>No amendment</u></p>

Comment ID	Name/Organisation	Comments	TWBC Summary	TWBC Recommendation
		<p>in contrast some observers have suggested that were appropriate measures taken by the developer, it would have a beneficial effect on the dormice.</p> <p>When the 'Sustainability Appraisal' states that Site 219 'does not score too negatively in terms of flood risk' what it means is that it is immeasurably preferable to either Site 218 ('considerable flooding constraints') or Site 1007 ('Strong mitigation measures need to be incorporated in any scheme to alleviate any flooding concerns'). Can TWBC explain why the comparison of the three sites is so tendentious?</p> <p>It is very disappointing that the consideration of future development in Paddock Wood should be based on such a tendentious document. I trust as a result of this consultation period, the allocation of residential development sites in Paddock Wood will be revisited on an impartial basis.</p>	<p>development on dormice. Development may have beneficial impact upon dormice.</p> <p>Response: As dormice are a protected species, they need to be considered in planning terms and impacts upon a population need to be carefully considered. Mitigation for dormouse populations is possible and this would be considered at the planning application stage. The sustainability appraisal matrix cannot score based upon the mitigation having been carried out, this would not be appropriate and would not provide a correct score.</p> <p>Summary: Respondent is concerned that the three sites in Paddock Wood have not been equally considered.</p> <p>Response: Section 3 of the Sustainability Appraisal main report describes the site assessment process the Council used for the Sustainability Appraisal. The Sustainability Appraisal process has been carried out in a consistent manner and the same matrix has been applied to all sites, on a site-by-site basis. The outcome for each of the sites is different because there are different characteristics and considerations at each of the sites concerned. Given this, it is proposed that no amendments are made in response to these comments.</p>	<p><u>No amendment</u></p> <p><u>No amendment</u></p>
	Martin Robeson Planning Practice representing Tesco Stores Ltd	<p>Response to site 244 relevant extract, repeated in site 220: We are concerned that the Sustainability Appraisal underplays the considerable positive social, economic and environmental benefits from substantially enhancing the town centre's retail provision in terms of travel saving, the reduction in the use of fuel and energy for travel, convenient access to local shopping for local residents, social inclusion in terms of ease of accessibility of reasonably priced food and goods and in enhancing local employment.</p>	<p>Summary: Site 244 and 220 have been scored incorrectly.</p> <p>Response: Section 3 of the Sustainability Appraisal main report describes the site assessment process the Council used for the Sustainability Appraisal. The Sustainability Appraisal process has been carried out in a consistent manner and the same matrix has been applied to all sites, on a site-by-site basis. The outcome for each of the sites is different because there are different</p>	

Comment ID	Name/Organisation	Comments	TWBC Summary	TWBC Recommendation
			<p>characteristics and considerations at each of the sites concerned.</p> <p>Site 244 has been given a positive score for transport (which includes access) and a positive score for efficient land use. This is intended to reflect that it is a brownfield site, within a town centre location. The service provision and employment objectives have been left as uncertain because the outcomes for these objectives depend upon the type of proposed development, whether residential or commercial/mixed use.</p> <p>Site 220 has been given a negative score for the social inclusion and service provision objectives because its existing use is as a public car park and its development would represent a loss of a community facility. It has been provided with an uncertain score for efficient land use because the site is in existing use as car park and car park allocation is protected in the Local Plan. It is also not certain whether the future impact of developing a proportion of the site outside the functional floodplain for less vulnerable uses would be positive or negative at this stage.</p>	<p><u>No amendment</u></p>
	<p>Mrs Gill Shaw Natural England Senior Environmental Specialist – Soils (this is in response to a TWBC enquiry, not a direct response on the Allocations DPD)</p>	<p>Agricultural Land Classification, Natural England has responded to an enquiry from TWBC as follows: “Thank you for seeking further guidance on the position that Natural England takes. We are led by the National Planning Policy Framework and as such would expect to see evidence, probably in the Sustainability Appraisal, that allocations are on land of least environmental and amenity value (NPPF Paragraph 110). This of course would include an assessment of the impact on soil. In relation to NPPF paragraph 109, we would advise that construction is in accordance with the Defra Construction Code of Practice for the Sustainable Use of Soils on construction sites. With respect to the ALC grade of land, paragraph 112 of the NPPF requires that LPAs should consider the impact on best and most versatile land. Site specific ALC survey data would aid this assessment and if BMV land is allocated Natural England would wish to see justification for the allocation in the context of NPPF paragraph 110.”</p>	<p>Summary: Natural England do not have up to date information in relation to the Agricultural Land Classification for our area. Response: <i>This work will need to be carried out by TWBC. The policy and sustainability appraisal for individual sites will need to be amended to take into consideration this further work.</i></p>	<p><u>Additional evidence work has been undertaken.</u> Proposed changes to the Sustainability Appraisal scores that result from this work will be brought to the Working Group over the coming months.</p>

Useful extracts:

- 1.1 Support for the Council's methodology is welcomed. Local planning authorities must demonstrate that the proposals in their plans are viable and that sites are likely to come forward for development. The NPPF states that the cumulative impact of planning policies "*should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle*" (paragraph 174). The Council undertook a high level viability assessment to inform the Consultation Draft Site Allocations DPD. As outlined in Item 3 to the Working Group meeting of 9 July, further viability work will be needed to inform the Submission Draft DPD. Given this, no amendments are proposed in response to these comments.
- 1.2 The Highways Agency states that it has no 'in principle' objections to the DPD. However, some concern is expressed about the quantity of development in Royal Tunbridge Wells, and the Agency has stated that it wishes to see analysis of traffic impacts as plans for the allocated areas and sites are developed and the Council's approach to parking emerges through the new Parking Strategy (Comment 1245).
- 1.3 No amendments proposed – The purpose of the DPD is to provide for the levels of development for the main settlements as set out in the Core Strategy. Any different level or distribution of growth – such as a new settlement - would need to be considered as part of a review of the Core Strategy. The Council will involve the Highways Agency in further work on the DPD and Masterplans for the town centre sites and is working with Kent County Council on transport modelling to inform the Submission Draft DPD. Given this, it is proposed that no amendments are made in response to these comments.
- 1.4 This section of the chapter sets out how Core Policy 1: Delivery of Development and the NPPF encourage the effective reuse of previously developed (or brownfield) land. Table 6 gives an indication of how development is anticipated to come forward in each of the Borough's main settlements.
- 1.5 A consultation comment (Comment 951) supports the aim of the DPD to identify broad 'Areas of Change' for reuse, refurbishment and redevelopment in Tunbridge Wells town centre and to guide change in these areas through the development of comprehensive masterplans.
- 1.6 Persimmon Homes (Comment 1314) comments that, although the aim of the NPPF to promote the reuse of previously developed land is recognised, the Council has not undertaken detailed viability assessments for all sites and some sites have longstanding occupiers that would require relocation before development could take place. Given this, it is argued that the Council should not place unnecessary policy requirements on allocated sites and must concentrate on bringing forward all allocated sites as quickly as possible.

Supporting infrastructure plans form part of the evidence base for the Site Allocations DPD and is a separate matter from the Sustainability Appraisal process.

Appendix 2: Sustainability Appraisal Policy Matrices

Appendix 2: Sustainability Appraisal Policy Matrices

Strategic Policies

Policy AL/STR1: Limits to Built Development

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education			✓			
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk			✓			
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

Limits to Built Development are defined around settlements in order to direct development to appropriate locations. There are some changes to the LBD boundaries within the Allocations DPD. This is likely to increase levels of pollution relating to an increase in local traffic and consumption, although continuing to locate new development within the proximity of town centres is likely to have a positive impact overall upon the social inclusion and transport objective. Increase in housing is likely to increase pressure upon existing services. However, in some cases development can provide additional services on larger sites and therefore this objective remains uncertain.

The objectives relating to water/flood risk, education and health are very site dependent and therefore these remain uncertain.

Changes to the LBD boundary to direct development away from greenfield land in more rural locations would have a generally positive impact upon the biodiversity, natural/built environment and efficient land use objectives.

Policy AL/STR2: Environmental and Recreation Designations

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime			✓			
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

There are a number of sites that are allocated for open space, recreation, landscape. Some sites are existing and some are new allocated areas. The matrix reflects both the retention of open space and its creation.

Impact upon the objectives for crime and education is very site specific and therefore this remains uncertain. In some cases, for example, such as where there is a provision for school playing fields, this could have a positive impact upon the education objective. A positive impact upon the crime objective could result from improving an area that is subject to anti-social behaviour or fly-tipping.

In general, allocating or retaining open spaces is likely to have a positive impact overall upon the health, social inclusion, service provision, efficient land use, pollution, water/flood risk, biodiversity and natural/built environment objectives. Increase in housing is likely to increase pressure upon existing services and therefore additional allocation of open space will be necessary. In some cases development can provide additional open space on larger sites and therefore these objectives would remain positive.

Policy AL/STR3: Safeguarding Former Railway Lines

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Former railway lines will be safeguarded as detailed and shown on the Proposals Map in the Allocations DPD.

This means that they will be protected from inappropriate development that could prevent future use as a transport corridor. As these areas will generally benefit transport, health and social inclusion, these objectives are positive in the matrix above. In addition, retaining these corridors will benefit green infrastructure and this would have a positive impact upon efficient land use, pollution, water/flood risk, biodiversity and the natural/built environment objectives. A positive impact upon the crime objective may result from improving an area that is subject to anti-social behaviour or fly-tipping.

Policy AL/STR4: Bewl Reservoir, Near Lamberhurst (land situated within Tunbridge Wells Borough)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk					✓	
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

A small proportion of the site lies within the AONB (4%) and 2% is designated as Ancient Woodland. It is outside the Limits to Built Environment. There is a small area of Archaeological Potential (1%).

A very small proportion of the site (0.07%) is an Environment Agency Aquifer Protection Zone. Just over half of the site is within Environment Agency Flood Zone 2 and 3.

This is greenfield land around the sides of a reservoir. There is a public right of way around the reservoir and this may need to be realigned in order to ensure that access remains open.

It is allocated that the area around Bewl water that is located within Tunbridge Wells Borough is safeguarded for extension of the reservoir in order to provide additional water resources and the matrix above reflects this.

Royal Tunbridge Wells

Policy AL/RTW1: Urban Design Framework

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This policy is to address accessibility, by defining and enhancing arrival points to the town. It aims to improve upon connectivity within the centre, green infrastructure and also to create high quality public spaces and streets, using locally distinctive materials.

Increasing accessibility to the town centre will have a positive impact upon the social inclusion and service provision objectives. High quality public spaces will have a positive impact upon crime reduction.

Creating green infrastructure and green spaces will have a positive impact upon the water/flood risk, biodiversity and natural/built environment objectives.

Enhancing arrival points to the town and developing clear movement strategy, including pedestrian priority streets, will have a positive impact upon the pollution, transport and health objectives.

Policy AL/RTW2 Crescent Road/Church Road Area of Change

Policy AL/RTW2A: Town Hall Site, the 'Civic Complex'

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education			✓			
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy					✓	
15	Employment					✓	

Summary recommendations:

This assessment represents the site originally assessed on page 67 of the Sustainability Appraisal (Draft for Consultation - Volume 2) and known as 'Town Hall Site'. No changes have been made to the original comments below or scores above.

This is a large town centre site in a prominent position at a major traffic junction in the heart of the town of Tunbridge Wells. It comprises a number of buildings, associated car parks and access roads with multiple functions including Town Hall, Assembly Halls, Public Library, Adult Education Centre, Calverley Terrace, Police Station and Magistrates' Court, Crescent Road and Calverley Road.

Redevelopment of this group of sites could potentially have a very large impact upon the centre of the town, its design, character, function, accessibility, provision of services and appearance. There are several listed buildings on site (Town Hall, Assembly Halls, Public Library, Adult Education Centre, Calverley Terrace, Police Station and Magistrates' Court). In addition to this the site lies entirely within the Conservation Area. Careful, considered design with the historic nature of the civic buildings taken into consideration has the potential to have a strong positive impact upon the built environment objective. There is also an opportunity to design crime reduction measures into the scheme and to incorporate some permanent facilities for the Tunbridge Wells Farmers' Market, currently held in Civic Way.

As it is a central location with good public access, where there are several services for the use of the general public, incorporating and retaining these current services could have a positive impact upon the objectives for service provision, efficient land use and transport. However, it must also be highlighted that in losing these public services and providing them in locations outside the town centre, this could have a negative impact upon these objectives.

The site has been submitted for mixed use: retail, office, employment, leisure and residential. Several of the buildings in this group are currently in employment use. At least some employment use would need to be retained in order to reduce the negative impact upon this objective.

Development could also have a positive impact upon the energy objective with design that incorporates renewable energy on a large mixed use site such as this one with high energy demand.

Policy AL/RTW2B: Former Cinema Site and Surrounding Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

This assessment represents the combination of 3 sites in close proximity that were originally assessed on pages 36, 42 and 46 of the Sustainability Appraisal (Draft for Consultation - Volume 2), and respectively known as, 'Mount Pleasant House, Lonsdale Gardens', 'Cinema Site, Mount Pleasant Road' and '27-67 Mount Pleasant Road'. This new site boundary also includes the adjacent highway on Mount Pleasant Road and Crescent Road.

As the site lies within the Conservation Area and within the LBD, there is an excellent opportunity to enhance the built environment with good quality design, particularly the northern area of the site (previously known as Cinema Site) which is a very prominent position at a crossroads in the centre of town. There is also (with sound mitigation) potential positive impact for the natural environment and biodiversity through better provision of street trees and green links through the site.

It is possible that the northern area of the site (previously known as Cinema Site) has some contaminated land issues that would need investigation.

The site currently offers employment and there will be no net loss of employment space unless new high quality office provision is made within the area. The score above reflects the unknown nature of the future development.

A positive contribution to crime would be made as the previous cinema site has been a long-standing vacant site.

This site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity.

Outside the AQMA.

Policy AL/RTW3: Vale Avenue Area of Change

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy					✓	
15	Employment					✓	

Summary recommendations:

This assessment represents the combination of 3 sites in close proximity that were originally assessed on pages 27, 28 and 68 of the Sustainability Appraisal (Draft for Consultation - Volume 2), and respectively known as 'Vale House, Vale Avenue', 'Merevale House, Vale Avenue' and 'Multi-Storey Car Park, Vale Road (Torrington Car Park)'. The site area also includes the Station Car Park on Mount Pleasant Road.

The site area is now approximately 35% AQMA and 4% listed building.

As the exact mix of office, retail and residential development is undecided, scores for Objectives 1 and 15 remain unchanged. Likewise, the remaining scores are not significantly affected by the change in boundaries and so also remain unchanged.

Site has good vehicle and pedestrian access. The site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity.

As this site is within the Conservation Area there is an opportunity to enhance the built environment with good design, with potential for a positive impact upon the built environment objective.

Due to its proximity to the Common, there is also (with sound mitigation) potential positive impact for the natural environment and biodiversity, in addition to positive opportunities for green infrastructure moving from the Common and connecting to the railway line.

Refer to pages 27, 28 and 68 of the Sustainability Appraisal (Draft for Consultation - Volume 2) for full details.

Policy AL/RTW4: Eridge Road Area of Change

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution			✓			
9	Water/flood risk		✓				
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This assessment represents the combination of 2 sites in close proximity that were originally assessed on pages 38 and 45 of the Sustainability Appraisal (Draft for Consultation - Volume 2), and respectively known as 'Union House Including Car Park, The Pantiles', and 'Land at Montacute Gardens Including Surface Car Park'.

It is expected that the site will provide a minimum of employment, retail, parking and transport improvements, with the possibility of residential and/or leisure use.

The site lies within the Conservation Area, a small proportion of Flood Zone and 78% of the area is within AQMA. There are Tree Preservations Orders at the boundary and a watercourse on and under the site.

Any development would need to consider the sensitivity of the site both in terms of the built and natural environment, with careful attention to good quality design and mitigation measures. There is potential for improving the Green Infrastructure through links with the Common and considering its position adjacent to The Grove, a historic Park and Garden and the railway line.

12% of the site area is identified as potentially contaminated that would need investigation.

Access to the site is good with road links and pedestrian access to local services and facilities in the Pantiles, and the mainline railway station in close proximity.

Policy AL/RTW5: 36-46 St Johns Road (Arriva Bus Depot)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

This site could offer mixed use development with residential to the rear.

There are some potentially positive environmental impacts, particularly through good quality remediation measures such as linkages to the green infrastructure network (Woodbury Park Cemetery), on-site contamination treatment and SuDS to replace existing hardstanding/concrete. However, it is within the Air Quality Management Area buffer zone and remediation measures would need to be considered as part of any development.

In addition, there is a positive potential for visual improvement through good quality design on what is a prominent site on a major road. With remediation this could outweigh any potential harm from redevelopment on what is previously developed land and the loss of service provision through losing the bus station site. Social inclusion and service provision are scored neutrally because the existing service would be provided elsewhere.

Policy AL/RTW6: Former Plant and Tool Hire, Eridge Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion			✓			
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk		✓				
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Well designed development at this site has the potential to add considerable visual improvement to this area as it is currently a derelict site in a prominent position. However, mitigation measures would be necessary in order to shift pollution (contaminated land issues) and flood risk across to a positive impact.

Care would need to be taken to enhance the biodiversity potential of the site and consideration given to its proximity to the Common and the fact that it is within the Conservation Area.

Although the site is reasonably close to the centre of town and public transport links.

Would have a positive impact upon the objective for meeting housing needs.

A quarter of the site is within the Air Quality Management Area buffer zone and this needs to be considered in any development.

Policy AL/RTW7: Homoeopathic Hospital, Church Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

Currently offering a public health service therefore loss of this provision would constitute a negative impact upon the health and employment objective. This would be dependent upon the nature of the future development and retention of employment purpose should be sought.

As this site is within the Conservation Area there is an opportunity to enhance the built environment with good design. Due to its proximity to the Common, there is also (with sound mitigation) potential positive impact for the natural environment and biodiversity.

The site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity.

Within the proposed extended AQMA therefore would require mitigation measures on/off site. In negative impact for pollution objective without this mitigation.

Policy AL/RTW8: Land at the Rifle Range, Warwick Park, TN2 5FD

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste					✓	
14	Energy					✓	
15	Employment			✓			

Summary recommendations:

This site is currently being used as a rifle range. An alternative location would need to be found for this recreational use. Topography may be a constraint on development. There is a small area of woodland on site, some open grassland outside the rifle range, in addition to vegetation and several single-storey buildings.

This site is within the LBD, but outside the town centre. 10% of the site is an Area of Important Open Space and 50% of the site is within an Area of Landscape Importance.

Residential development would have a positive impact upon the objective for meeting housing needs and efficient land use, as this would be potentially appropriate as residential use and is previously developed land.

Not known whether there is paid employment on site.

There is good existing access off Warwick Park Road.

Policy AL/RTW9: Lifestyle Motor Europe, Langton Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

This site lies entirely within the Conservation Area and 99% within the Limits to Built Development. One corner of the site just extends into the Green Belt.

The site is predominantly previously developed land, comprising sales building, parking and hardstanding. There are a number of street trees at the front of the site.

Good quality design could enhance the Conservation Area and the quality of this sensitive urban edge adjoining the Green Belt, located on a major approach route to the town. Overlooking from the hotel may be an issue for residential development. There is limited access to the site but this would need to be improved. The possibility of contaminated land issues would need to be investigated and addressed during redevelopment.

Policy AL/RTW10: Former Gas Works, Sandhurst Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk			✓			
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport				✓		
13	Waste				✓		
14	Energy			✓			
15	Employment			✓			

Summary recommendations:

This site is within the Limits to Built Development and outside the Green Belt.

Adjacent land has recently been built on. It is possible that some green infrastructure links could be created with Grosvenor Park and Hilbert Local Nature Reserve to the rear of the recent development. These links could also make a positive contribution to the objectives for social inclusion and health by linking the development with the park and its recreational facilities. This would also reduce the negative impact upon the biodiversity and natural environment objectives.

Remediation work would need to be carried out on-site, as it is currently a gas works.

It is not within a defined area of flood risk, but consideration needs to be given to the pond and watercourse on the site and its link to the nearby Local Nature Reserve.

Good design could potentially improve this site as it is in a prominent position and there is some potential positive impact upon the crime objective as at present there is an isolated footpath that goes around the site where there is potential for anti-social behaviour such as graffiti.

Policy AL/RTW11: Land at Goods Station Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

Close proximity to town centre for service provision and transport links. Good opportunity to create green infrastructure links.

Loss of employment use would need to be considered as currently business/light industrial. Remediation for contaminated land may also be required.

Outside the AQMA.

Policy AL/RTW12: Land at Quarry Road, TN1 2HA

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is inside the LBD but outside the town boundary. It is predominantly previously developed land with some vegetation. There may be some contaminated land issues.

Access to this site is good, via Quarry Road.

Recent residential development has been completed in the area around this vacant land.

Green infrastructure links possible considering proximity to existing railway line; this would have a positive impact upon the biodiversity/natural environment objective.

May have impact upon education objective when considering proximity to school and additional capacity; also considering opportunities for increasing school outdoor space on such a small school site.

Policy AL/RTW13: Tunbridge Wells Telephone Engineering Centre, Broadwater Lane, TN2 5RE

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime					✓	
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment	✓					

Summary recommendations:

This site is inside the LBD but outside the town boundary. A very small part of the site is within an Area of Landscape Importance.

Access to this site is good and well established from Broadwater Lane for the Turners Factory.

Residential development could impact upon the employment objective as current site is used for a factory. Alternative location for the factory could be investigated.

With mitigation, development at this site could be beneficial, both in terms of connectivity to surrounding green infrastructure and also in terms of good quality urban design to improve the existing residential area of Broadwater Lane. This could have a positive impact upon local residents' health with a decrease in heavy vehicle traffic flow. There may be an implication for education in terms of additional pressure on existing primary school provision in this 'enclosed' area and pressure on other services, but there may be some potential within the planning of the development for additional service provision.

Policy AL/RTW13: The WA Turner Factory, Broadwater Lane, Royal Tunbridge Wells TN2 5RD

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime					✓	
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment	✓					

Summary recommendations:

This site is inside the LBD but outside the town boundary.

Access to this site is good and well established from Broadwater Lane.

Residential development could impact upon the employment objective as current site is used for a factory. Alternative location for the factory could be investigated.

With mitigation, development at this site could be beneficial both in terms of connectivity to surrounding green infrastructure and also in terms of good quality urban design to improve the existing residential area of Broadwater Lane. This could have a positive impact upon local residents' health within decrease in heavy vehicle traffic flow. There may be an implication for education in terms of additional pressure on existing primary school provision in this "enclosed" area and pressure on other services but there may be some potential within the planning of the development for additional service provision.

There may be contaminated land issues.

Good access to main road connecting to major routes.

Policy AL/RTW14: Land at Medway Road (east)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment	✓					

Summary recommendations:

Within Limits to Built Development. Not within defined flood risk.

Development of this site for non-employment purpose would represent a strong negative impact upon this objective.

Some remediation work may be necessary to remove contamination. This would have a positive impact on the pollution objective.

Good access to town centre and main road connecting to major routes.

Would have a positive impact upon the objective for meeting housing needs and efficient land use.

Policy AL/RTW15: 123-129 Silverdale Road, Silverdale Road/ Merrion Way, Royal Tunbridge Wells TN4 9HX

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

Access to this site could be made from either Silverdale Road or Merrion Way. Parking provision would need to be provided in order to avoid an increase in on-street parking.

May need remediation work as former industrial use. Some employment use on land also, which would need to be considered in order to reduce the negative impact upon this objective.

Sympathetic development would visually improve the site and also have a positive impact upon the crime objective, as it is associated with some anti-social behaviour such as littering/ flytipping/ graffiti.

Policy AL/RTW16: Beechwood Sacred Heart School, Royal Tunbridge Wells (Site 335)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is predominantly greenfield land to the east of Beechwood Sacred Heart School on the Pembury Road. There are scattered mature specimen trees, particularly to the South East and also to the north on the road frontage and these should be considered in any development proposal. There are no buildings on site at present.

It is mainly within the LBD and lies entirely within Conservation Area. In addition to this it is partially within the Green Belt and Area of Landscape Importance. With careful design considerations and appropriate mitigation measures it is possible that there could be some limited residential development to the north of the site.

The site has been reduced in size since the original assessment. However, the amendment is insignificant from the perspective of a sustainability appraisal and thus the original scoring shown above is still deemed appropriate.

Policy AL/RTW17: Former Builders' Yard, Goods Station Road, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

Remediation measures for land contamination may be necessary in order to prevent a negative impact upon objective for pollution.

Currently site is considered as in employment use therefore future use may have an impact upon employment objective.

Close proximity to town centre for access to services and transport links.

Outside the AQMA.

Policy AL/RTW18: Land at Unigate Dairy, St Johns Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

This site could offer mixed use development with residential to the rear. There are some potentially positive environmental impacts, particularly through good quality remediation measures such as linkages to the green infrastructure network, on-site contamination treatment and SuDS to replace existing hardstanding/concrete. However, it is within the Air Quality Management Area buffer zone and remediation measures would need to be considered as part of any development.

In addition to this there is a positive potential for visual improvement through good quality design on what is a prominent site on a major road. With remediation this could outweigh any potential harm from redevelopment on what is previously developed land and the loss of service provision through losing the Unigate dairy. This service provision may need to be provided elsewhere in order to reduce the negative impact upon service provision.

This site is within the AQMA buffer zone.

This amended boundary to this site no longer includes the Freeway Tyres land to the south of the original proposal. Despite this change, the original scoring shown above is still deemed appropriate.

Policy AL/RTW19: Land at Royal Victoria Place, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion		✓				
4	Education			✓			
5	Crime					✓	
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

This site is within the LBD and 20% Conservation Area.

The site comprises shopping centre, multi-storey car park, private gym, open “plaza” area, church and community hall.

The site has been submitted for retail, business and restaurant/cafe use. Development of this extension to the main shopping area could have a large contribution to the retail need of the town. However, the allocation could result in a loss of community services including a private gym, community centre and church which would have a negative impact on social inclusion and service provision.

Good design could result in positive impact upon objectives for crime, efficient land use and the built environment.

The site is 12% within the AQMA buffer zone.

Policy AL/RTW20: 77 Mount Ephraim

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site is currently in employment use and comprises a number of office buildings, car park and surrounding, set in well kept and mature gardens including trees. Not all of the office buildings are occupied and are likely to require refurbishment.

The site is entirely within the LBD. Less than 1% of the site is Conservation Area. This site is identified in the town centre Key Employment Area.

The site has good vehicle access and is within easy pedestrian access for the employees to the train station and town centre.

Ideally this site should be retained in office use and the high value gardens retained in order to avoid a negative impact upon service provision, efficient land use, biodiversity and the natural and built environment.

The site is in close proximity to the town centre for access to services and also to the mainline station and main road A26 for connectivity.

Policy AL/RTW21: Mount Pleasant Avenue Car Park

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy			✓			
15	Employment					✓	

Summary recommendations:

This site lies entirely within the Conservation Area and also within the LBD. It currently functions as a car park, for the office building to the north of the site during the working week and for the public at weekends. The site is tarmac on a moderate slope from north to south. There are mature trees along the east and west boundaries that would need to be considered in any development.

Although there is an opportunity to enhance the built environment with good design on this site, loss of parking provision would need to be allowed for elsewhere. There is also an opportunity to design in crime-prevention measures in any new development.

There is limited opportunity to offer positive impact upon the natural environment and biodiversity objectives due to its small size and town centre location. However, there could be some opportunity for green infrastructure links considering its position adjacent to Calverley Grounds, an Historic Park and Garden.

As the site is within the Local Plan Economic Development Area, there would be an opportunity for business or mixed use. However, it is possible that this mixed use may include some residential development.

Pole-mounted solar panels are currently on-site serving the AXA building to the north. These would need to be accommodated in an alternative location in order to prevent a negative impact upon the energy objective.

Vehicle access to the site is good. The site is in close proximity to the mainline station and the town centre for access to services.

Policy AL/RTW22: Lifestyle Ford, Mount Ephraim/Culverden Street/Rock Villa Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy					✓	
15	Employment			✓			

Summary recommendations:

This is currently in commercial use, although there is some mixed use/residential adjacent to the site. The site lies entirely within the Conservation Area. There is a potential positive built environmental impact from improvements to the urban built environment with good quality design.

There could be an opportunity for higher density residential development, particularly with the provision of SuDS to alleviate off-site flood risk through increased run-off.

This site development would have a positive impact upon the efficient use of land.

There is some very limited potential for improvement to Green Infrastructure network (owing to relatively small size of site and lack of connectivity).

The impact on employment and service provision will depend on the mix of uses on site.

The outcome for this site is strongly dependent upon appropriate mitigation measures.

100% within the AQMA buffer zone.

Policy AL/RTW23: John Street Car Park

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion			✓			
4	Education				✓		
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site lies entirely within the LBD. Mixed use development will have a minor positive impact on housing need and employment. The impact on social inclusion will depend on the affordability of the housing and the mix of uses. However, this is an accessible location close to existing services and public transport. The impact on transport is uncertain. However, the location will encourage non-motorised modes. Service provision will depend on the mix of uses but car parking and recycling facilities are to be retained. This is a previously developed site within the LBD and represents an efficient use of land.

There is an opportunity to enhance the built environment and crime reduction with good quality design and some limited opportunity for biodiversity by incorporating green infrastructure.

Site is within the AQMA buffer zone.

Policy AL/RTW24: Land off Grove Hill Road, 8-16 Grove Hill Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site lies entirely within the Conservation Area and also within the LBD. It includes six retail buildings, corresponding car parking to the rear of the retail buildings and also a public car park to the south, adjacent to the railway and the entrance to the railway tunnel. There are mature trees surrounding the boundary of the car park that would need to be considered in any development.

Although there is an opportunity to enhance the built environment with careful design on this prominent corner site, loss of parking provision would need to be allowed for elsewhere. There is also an opportunity to include crime-prevention measures in any new development.

There is an opportunity to offer positive impact upon the natural environment and biodiversity objectives through green infrastructure links, considering its position adjacent to The Grove, a Historic Park and Garden and the railway line.

The site lies within the Primary Shopping Area and is allocated for Retail Mixed development. The site is 94% within the Local Plan Economic Development Area.

Vehicle access to the site is good, although the entrance to the site is onto a busy traffic island and modification would be difficult because of the railway line. The site is in close proximity to the mainline station and the town centre for access to services.

Policy AL/RTW25: Auction House and Public Car Park, Linden Park Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

The site is in close proximity to the Pantiles for access to retail and services and fairly close to the mainline station. Any development could have a positive impact upon pedestrian links with the retail area.

This site lies entirely within the Conservation Area and careful design could have a positive impact upon the built environment. There is some opportunity for positive impact upon the natural environment through green infrastructure links.

Less than 1% of the site is within the AQMA. The impact on housing need, health, social inclusion and employment will depend on the mix of uses.

Policy AL/RTW26: Kenwood House, Upper Grosvenor Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

Central town centre site within the LBD and 20% Conservation Area. Site is prominent from the ring road around the town centre and good quality design could considerably improve the appearance of this part of the town centre. The site is currently in use as office buildings with associated parking and a small amount of retail on the ground floor.

The site is allocated for retail, residential and business use. Loss of employment use should be avoided as this site falls within this Economic Development Area.

The site lies entirely within the AQMA.

Policy AL/RTW27: Royal Tunbridge Wells Town Centre Key Employment Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment						✓

Summary recommendations:

This policy directs employment opportunities to specific defined areas.

In general, this focus on specific areas for employment will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support employment opportunities and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/RTW28: North Farm/Longfield Road Key Employment Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment						✓

Summary recommendations:

Within Limits to Built Development. This area is currently an edge of town retail and industrial area located within the Limits to built development incorporating a broad range of employment uses and some derelict and vacant land. Continued designation as a key employment area will have a strongly beneficial impact on employment objectives. It is expected to have little impact on housing need, health, social inclusion, education, crime, waste or energy.

Any redevelopment of this area is likely to have a beneficial impact on service provision, efficient land use, the natural and built environment and transport, by providing opportunities to improve foot and cycle path networks, access by public transport and improvement the quality of the layout and structures.

The area adjoins open countryside and some ancient woodland and there are drainage ditches, streams, pond and trees. Some of the site is within flood zones. The impact on water/flood risk and biodiversity is uncertain depending on the location of any development and the mitigation measures implemented.

There may be contaminated land issues and the impact on pollution will depend on whether the uses are polluting, any impact on traffic movements and remediation work on any land contamination. Good access to main road connecting to major routes.

Policy AL/RTW29: Royal Tunbridge Wells Town Centre Boundary and Primary Shopping Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Town Centre Boundary and the Primary Shopping Area. It also gives the percentage thresholds for non-A1 (retail) uses within the Primary Shopping Area.

In general, this focus on specific areas for retail will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/RTW30: Neighbourhood Centres

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Neighbourhood Centres.

In general, this focus on specific areas will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/RTW31: Recreation Open Space

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This policy defines on the Proposals Map the recreation designations for sports pitches, other outdoor recreation facilities and children's playspace.

In general, this focus on specific areas will have a positive impact upon the health, social inclusion, service provision and efficient land use objectives. As these relate to green spaces, it should also have a positive impact upon the water/flood risk, biodiversity and natural/built environment objectives.

The impact upon the pollution and education objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Southborough

Policy AL/SO1: Land at Yew Tree Road (Southborough Library)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion		✓				
4	Education		✓				
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use			✓			
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste			✓			
14	Energy			✓			
15	Employment		✓				

Summary recommendations:

A proportion of the site is within Area of Landscape Importance and it is also in a very prominent position on a major junction. There are a number of mature street trees on site. Therefore any development could have a negative impact upon the natural/built environment objective without careful, good quality design and strong mitigation measures on such a prominent site.

Loss of current use as a library would have a negative impact upon the objectives for social inclusion, service provision and education and would need to be provided for. Although this is not an employment site in planning terms, there is employment on site at present.

Site is in close proximity to other services on the high street, has good vehicle access next to A26 and good bus links but is **inside the AQMA 80m buffer zone**. Consideration would need to be given to this in the event of any development in order to reduce a negative impact upon the pollution objective.

Would have a positive impact upon the objective for meeting housing needs.

Policy AL/SO2: Southborough Hub (Area 1), London Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education			✓			
5	Crime					✓	
6	Service provision			✓			
7	Efficient land use			✓			
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy					✓	
15	Employment			✓			

Summary recommendations:

This is a large site that is in mixed use and includes a large proportion of recreational space. It links with Southborough Hub (Area 2). It is in a very prominent position within the town.

Site is allocated in the Local Plan for mixed use to include residential and retail provision. Only a very small proportion of the site is within the Area of Landscape Importance and this would represent the loss of recreational space. Therefore any development could have a negative impact upon the natural/built environment objective without strong mitigation measures, particularly relating to the adjacent Southborough Hub (Area 2). It is possible that this could be achieved with sensitive design and careful consideration to Green Infrastructure links.

Loss of current uses on-site as a community centre, council office, theatre and educational facility would need to be provided for elsewhere or within a mixed use development on-site in order to avoid a negative impact upon the objectives for health, social inclusion and education. There is also employment on-site at present and this equivalent would need to be provided for in order to reduce the negative impact upon this objective. With careful design and sensitivity this could in present an opportunity to improve the current facilities and visual character of the town centre of Southborough.

Site is close to A26 although there may be issues with vehicle access to the site, in particular relating to existing residential properties. These access issues would need to be addressed in order to avoid a negative impact upon the transport objective. Good bus links on A26 but is **inside the AQMA**.

Therefore mitigation measures would be needed to address this negative impact upon the pollution objective.

Any residential development would have a positive impact upon the objective for meeting housing needs. Mixed use development may lend itself to renewable energy provision, in which case this could have a positive impact upon the energy objective.

Policy AL/SO3 Recreation Open Space

Policy AL/SO3: Southborough Hub (Area 2), The Ridgeway

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education			✓			
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This policy defines on the Proposals Map the recreation designations for sports pitches, other outdoor recreation facilities and children's playspace.

In general, this focus on specific areas will have a positive impact upon the health, social inclusion, service provision and efficient land use objectives. As these relate to green spaces, it should also have a positive impact upon the water/flood risk, biodiversity and natural/built environment objectives.

The impact upon the pollution and education objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/SO3: Land east of London Road, Southborough

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment			✓			
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a small site allocated in the local plan as a NEAP (Neighbourhood equipped Area for Play).

The location is within existing green space (mown grass), within the LBD and outside the AQMA. The site has limited potential for protected species.

This allocation represents efficient land use due to its location adjoining an existing settlement and for being a development of appropriate density for the location chosen. The site is unable to score positively for the Natural/Built Environment objective due to the location being within an Area of Important Open Space. However, good design would ensure minimal impact.

Policy AL/SO4: Southborough High Brooms Key Employment Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment						✓

Summary recommendations:

This policy directs employment opportunities to a specific defined area of High Brooms.

In general, this focus on specific areas for employment will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support employment opportunities and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/SO5: Town Centre Boundary and Primary Shopping Areas

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Town Centre Boundary and the Primary Shopping Area. It also gives the percentage thresholds for non-A1 (retail) uses within the Primary Shopping Area.

In general, this focus on specific areas for retail will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/SO6: Neighbourhood Centres

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the two Neighbourhood Centres for Southborough at High Brooms and North Southborough.

In general, this focus on specific areas will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Green Belt and Rural Fringe

Policy AL/GB1: Speldhurst Road former Allotments, Land between Bright Ridge and Speldhurst Road, Southborough

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Green space on the edge of a town. Formerly allotment site and adjacent to both fields and residential area. Adjacent to AONB and Green Belt, current designation as Rural Fringe and 9% LBD. Any development would need to respect proximity to the AONB and also views from the west as the site is on a ridge.

Development would have a negative impact upon biodiversity and natural environment objectives. Mitigation would need to be provided and this could include providing green infrastructure links through the site.

Site has good potential vehicle access through existing residential development.

Would have a positive impact upon the objective for meeting housing needs and is well placed for service provision in the town of Southborough.

Outside the AQMA.

Policy AL/GB2: Knights Way, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion		✓				
4	Education				✓		
5	Crime					✓	
6	Service provision		✓				
7	Efficient land use	✓					
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is designated as a Rural Fringe site in the Local Plan (2006) and submitted for residential and other uses. The AONB broadly surrounds the site and the site includes Greggs Wood, which is an area of semi-natural ancient woodland and is designated as Local Wildlife Site.

Site is currently mostly woodland with some grazing and housing at the edge.

Any additional traffic pressure through the existing residential area would need to be considered as part of any potential development.

Impact would be negative for social inclusion and service provision, unless services are provided on-site.

Strong mitigation measures would be required in order to avoid a negative impact upon the natural environment and biodiversity. It is a very sensitive site in landscape terms. Any development would need to avoid ancient woodland, which would reduce the developable area significantly.

The Site Allocations DPD submission version has now combined this site with 'Land at Knights Park'.

Policy AL/GB2: Land at Knights Park, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion		✓				
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution		✓				
9	Water/flood risk				✓		
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Part of this site is designated as a Rural Fringe in the Local Plan (2006) and submitted for residential and other uses. The AONB covers a portion of the site, as does the Green Belt.

Site is currently mostly woodland in the east and south of the site with fields to the north and centre of the site.

Any additional traffic pressure through the existing residential and industrial estate area would need to be considered.

Impact would be negative for social inclusion and service provision, unless services are provided on-site.

Strong mitigation measures would be required in order to avoid a negative impact upon the natural environment and biodiversity. It is a very sensitive site in landscape terms. Any development would need to avoid ancient woodland and this would significantly reduce the developable area.

The Site Allocations DPD submission version also refers to this site as 'Home Farm, Sherwood Park and Greggs Wood' and has now combined this site and 'Knights Way'.

Policy AL/GB3: Land at Hawkenbury Farm, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use	✓					
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is a Rural Fringe site (99%) with a very small fraction of the site as LBD (0.1%). The site is defined within the Landscape Character Assessment and Capacity Study as having moderate capacity for housing.

It is a greenfield site, currently mostly grassland with some boundary hedgerow and scrub/secondary woodland. There are allotment gardens within the north of the site and a mixture of Grade 2, 3b and 3a agricultural land in the remaining area. Because approximately 44% of the site area is classified as Best and Most Versatile, the efficient land use objective is scored negatively. Mitigation measures would be required in order to avoid a negative impact upon the natural environment and biodiversity.

To the north of the site there is a residential area and a public footpath surrounds the site to the south and east. Vehicle access would need to be created as there is none at present. Access to services and social inclusion is reasonable at this edge of town location.

Cumulative effect needs to be considered here with nearby sites.

This amended site no longer includes the land previously proposed for allotments north west of the main site. The original scoring is still deemed appropriate.

Policy AL/GB4 Rural Fringe (long-term land reserve)

Policy AL/GB4: Land at the Rocks, Reynolds Lane, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

A small proportion of the site lies within the Green Belt (5%). The entire site is outside the Limits to Built Development. A small proportion of the site is designated as Local Wildlife Site (9%).

The site is part builders' yard currently in use. A stream passes through the site and there are wet areas.

This site is at a sharp corner of a rural lane. Existing vehicle access to the site is good.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD.

This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at The Lodge, Culverden Park
- Land at Culverden Down (all parts)
- Culverden Stadium
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Land at The Lodge, Culverden Park, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

The entire site is outside the Limits to Built Development. Most of the site (98%) is a Site of Local Nature Conservation Value.

The site comprises mature woodland. It is difficult to gain access to the whole site.

This is a rural fringe site in the 2006 adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at Culverden Down (all parts)
- Culverden Stadium
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Land at Culverden Down, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion				✓		
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Less than 1% of this site is within the Limits to Built Development. Less than 1% of the site is within the Air Quality Management Area. Most of the site is within the Special Landscape Area.

The site is currently playing fields, lying to the south of St Johns Leisure Centre. It includes an artificial pitch and there are specimen trees through the site, particularly at the southern and western boundaries.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at The Lodge, Culverden Park
- Culverden Stadium
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Land at Culverden Down, Royal Tunbridge Wells (site part 1)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

Less than 1% of this site is within the Limits to Built Development. It is adjacent to the Green Belt.

The site includes the buildings of Rose Hill School and Bennett Memorial School and associated playing fields. It also includes some of the land surrounding Bishops Down School.

There are specimen trees through the site and extensive hedgerow around the boundaries and a small amount of ancient woodland (4%).

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at The Lodge, Culverden Park
- Culverden Stadium
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Land at Culverden Down, Royal Tunbridge Wells (Part 4)

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Less than 1% of this site is within the Limits to Built Development. It is adjacent to the Green Belt. 15% of the site is a Local Wildlife Site. Less than 1% of the site is within the Air Quality Management Area. There is a public right of way across the site.

The site includes the land to the west of Tunbridge Wells Grammar School and to the south of St Gregory's School. It is made up of playing fields and permanent pitches in the north section of the site and grassland with woodland to the south.

Although pedestrian access is good to the south part of the site (north is restricted as it is part of the school grounds) vehicle access from Reynolds Lane, a rural lane, would be difficult.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at The Lodge, Culverden Park
- Culverden Stadium
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Culverden Stadium, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

The whole of this site lies entirely outside the Limits to Built Development. 36% of the site is a Site of Local Nature Conservation Value. 17% of the site is Ancient Woodland.

The site includes the football stadium, its access road and woodland to the north of the site and at the site boundaries.

Pedestrian and vehicle access to the site is good.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at The Lodge, Culverden Park
- Land at Culverden Down (all parts)
- Rural Fringe Land at 54/56 Culverden Down

Policy AL/GB4: Rural Fringe land at 54/56 Culverden Down

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely outside the LBD but is adjacent to it. 14% is designated as Ancient Woodland. 62% of this site is Site of Local Nature Conservation Value.

This site is steeply sloping with trees and mature vegetation around the edges of the site. It is adjacent to a residential area. Parts of the site are wet and there is a pond on site. Some of the site appears to be previously landscaped garden.

There is no vehicle access at present. There is a narrow lane that serves adjacent properties.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

The Site Allocations DPD submission version now refers to this site as 'Culverden Down' in combination with the following neighbouring sites:

- Land at the Rocks, Reynolds Lane
- Land at The Lodge, Culverden Park
- Land at Culverden Down (all parts)
- Culverden Stadium

Policy AL/GB4: Grange Road Allotments, off Wickham Gardens, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely outside the LBD. 78% of the site is used as allotments.

The boundary of the site to the north east and north west have hedgerow and trees.

There is pedestrian access from Wickham Gardens and there is a small access road with parking outside the boundary of the site.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for development during the plan period.

Policy AL/GB4: North Farm Tip, Royal Tunbridge Wells

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste			✓			
14	Energy			✓			
15	Employment				✓		

Summary recommendations:

This is a former landfill and this covers a large proportion of the site (63%). It is likely that there would be contaminated land issues associated with any development of the site and this has a negative impact upon the pollution objective. This site is unlikely to be suitable for residential development.

A stream runs along the northern boundary of the site. It has a small area of flood risk (5%) SFRA Flood Zone 3.

The railway line runs along the western boundary and Barnetts Wood Local Nature Reserve is on the other side of this. The site is a prominent, open field in the centre with boundary light hedgerows and some woodland and scrub areas. Development is likely to have a negative impact upon the biodiversity and natural environment objectives unless mitigation measures are provided.

Although the site is adjacent to Dowding Way, access would need to be established onto what is a busy road. Cycle and pedestrian access is good, along nearby cycle ways through to High Brooms and the Industrial Estate. In the case of light commercial development, the site is potentially well placed.

However, there is no nearby neighbourhood centre but as the site is not likely to be considered for residential development during the plan period this is of less significance.

This is a rural fringe site in the 2006 Adopted Local Plan and is being allocated by the DPD. This matrix reflects its use as long-term land reserve and would change if the site was allocated for any development during the Plan period.

Policy AL/GB5 Major Developed Sites in the Green Belt

Policy AL/GB5: Holmewood House School, Langton Green

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education						✓
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	
Summary recommendations:							
<p>This site is within the AONB (71%) and lies entirely within the Green Belt. The site is currently used as a private school, with associated buildings and playing fields. It also includes a listed building.</p> <p>This site is designated in the Adopted Local Plan 2006 as a Major Developed Site in the Green Belt (substantial core of permanent buildings above 7500sqm). It is intended that this policy should be carried through into the Site Allocations Development Plan Document. Redevelopment or infill will be permitted where it accords with policy.</p>							

Policy AL/GB5: Kent College, Pembury

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education						✓
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site is entirely within the AONB and also lies entirely within the Green Belt. The site is currently used as a private school, with associated buildings.

This site is designated in the Adopted Local Plan 2006 as a Major Developed Site in the Green Belt (substantial core of permanent buildings above 7500sqm). It is intended that this policy should be carried through into the Site Allocations Development Plan Document. Redevelopment or infill will be permitted for educational uses where it accords with policy.

Policy AL/GB5: Tunbridge Wells Hospital, Tonbridge Road, Pembury

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health						✓
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site is entirely within the Green Belt. The site is currently used as a hospital, with associated buildings and some woodland. It also lies entirely within an Environment Agency Aquifer Protection Zone.

This site is designated in the Adopted Local Plan 2006 as a Major Developed Site in the Green Belt (substantial core of permanent buildings above 7500sqm). It is intended that this policy should be carried through into the Site Allocations Development Plan Document. Redevelopment or infill will be permitted where it accords with policy.

Paddock Wood

Policy AL/PW1: Commercial Road West Car Park

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion		✓				
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk	✓					
10	Biodiversity				✓		
11	Natural/built environment				✓		
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

Currently used as car park for the town centre. Car Park allocation is protected in Local Plan.

A small proportion of the site (18%) is within Flood Zone 3b and this proportion of the site would not be suitable for development. If car park facility can be provided elsewhere, the proportion of the site outside the functional floodplain may be suitable for less vulnerable uses. It could be considered as part of masterplan process for whole of town centre area.

The Site Allocations DPD submission version now refers to this site as 'Land off Station Road/Commercial Road and Commercial Road West Car Park' in combination with the neighbouring site 'Land off Station Road/Commercial Road'.

Policy AL/PW1: Land off Station Road/Commercial Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

Currently used as a builders yard and includes some derelict land. The site may be suitable for development, including residential or mixed use. It could be considered as part of masterplan process for the whole of the town centre area, including Land off Station Road/Commercial Road and Commercial Road West Car Park, Commercial Road/Station Road.

Mitigation measures would need to be provided in order to reduce impact upon flooding as it is within Flood Zone 3.

Transport links are good through to Station Road. There is some opportunity for improvement to green infrastructure through the development of this site and potential improvement for the natural and built environment.

The Site Allocations DPD submission version now refers to this site as 'Land off Station Road/Commercial Road and Commercial Road West Car Park' in combination with the neighbouring site 'Commercial Road West Car Park'.

Policy AL/PW2: Wesley Centre, Commercial Road TN12 6DS

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity				✓		
11	Natural/built environment				✓		
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This is a small site and is currently in use as a community facility. Therefore there is limited positive potential for development for residential purposes.

The Sustainability Appraisal has been completed considering that the community use will be perpetuated as part of future development. However, if this community facility is lost then this would have a negative impact upon service provision, social inclusion and education.

The site represents low positive potential for environmental impact for natural environment and biodiversity, mainly because it has low present value. Opportunities for improvements to green infrastructure are fairly limited due to small size of site and urban surroundings with lack of connectivity.

Policy AL/PW3: Land at Church Farm, Church Road, TN12 6HS

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution		✓				
9	Water/flood risk	✓					
10	Biodiversity		✓				
11	Natural/built environment	✓					
12	Transport					✓	
13	Waste				✓		
14	Energy			✓			
15	Employment				✓		

Summary recommendations:

Development on this site could potentially have a strong negative impact upon local landscape and the natural environment and result in the loss of greenfield land. In addition, approximately 26% of the site area is classified as Grade 3a Best and Most Versatile agricultural land, with the remaining land classified as Grade 3b (approximately 67%) or non agricultural (approximately 7%). From this point of view it does not represent efficient land use; however, as it is rural fringe then development would potentially be well positioned for services and accessibility.

Although flooding issues could be mitigated for, it is unknown at this stage whether mitigation measures would outweigh the potential environmental harm. There are areas of both Flood Zone 2 and Flood Zone 3 on-site. There are areas of surface water flooding shown on the 1 in 30 exceedance map and on the 1 in 200 exceedance map in the Surface Water Management Plan.

Possible negative impact from the point of view of increased local congestion on minor roads and increased air pollution, but the site is well positioned for access to existing roads.

A well-designed scheme could have positive impact upon social inclusion and health through improved green links and limited opportunity for on-site increase in service provision and renewable energy schemes.

Policy AL/PW3: Land off Mascalls Court Road, Paddock Wood

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need						✓
2	Health			✓			
3	Social inclusion			✓			
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This site is mainly in agricultural use, with some strong hedgerows that would need to be given consideration as part of any development. There is some woodland at the boundary of the site and adjacent to it. The site represents negative potential for environmental impact for natural environment and biodiversity, mainly because it has high present value as greenfield land. Development proposals would need to address ecological mitigation.

Approximately 33% of the site area is classified as Grade 3a Best and Most Versatile agricultural land, with the remaining land classified as Grade 3b (approximately 67%). As this site is allocated for housing, scoring for the efficient land use objective reflects this.

There is a small area of Flood Zone 3 on site and it is adjacent to small areas of Flood Zone 2 and Flood Zone 3. There is also some surface water flooding shown on the 1 in 30 exceedance map and on the 1 in 200 exceedance map in the SWMP. Strong positive mitigation measures would need to be provided in order to reduce the potential negative impact upon flooding.

Although the site is large and therefore is indicated as a double positive for the housing objective, housing numbers and density will be influenced by flooding mitigation.

Measures for improved transport infrastructure may also be required and this site is a reasonable distance from town-based services. This could be mitigated for if local services are provided as part of the development scheme. Development here would represent expansion of the current town boundary.

As the land is currently in agricultural use, this could lead to potential small loss of employment. However, current proposals are for residential development including the provision of a primary school, in order to meet the requirements for increased pupil numbers in Paddock Wood. This would give a positive impact for employment, education and the service provision and the matrix above reflects this.

Policy AL/PW4: Land at Mascalls Farm, Badsell Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution		✓				
9	Water/flood risk		✓				
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

There is limited positive potential for development due to landscape and natural environment issues. Positive mitigation measures would need to be provided in order to reduce the potential negative impact upon flooding. There is no Zone 2 or 3 flooding on-site, but there may be some drainage issues and there is some surface water flooding. It features on the 1 in 30 exceedance map and on the 1 in 200 exceedance map in the Surface Water Management Plan.

Approximately 80% of the site area is classified as Grade 3a Best and Most Versatile agricultural land, with the remaining land classified as Grade 3b (approximately 10%) or non agricultural (approximately 10%).

The site represents high negative environmental impact for natural environment and biodiversity, mainly because it has high present value, both on-site and in its immediate surroundings. It is adjacent to a Local Nature Reserve and consideration would need to be given to this in the event of any development. In addition to this, development here would represent expansion of the town beyond its present boundary, defined by the edge of housing and the B2017, a busy road for traffic entering the town from the west.

There are opportunities for improvements to green infrastructure are present, in particular through extension of the high quality hedgerows and field boundaries.

Current use as orchard and arable could lead to potential small loss of employment.

There is a high positive impact upon the housing objective because of the large size of the site. In addition, it is positive considering vehicle access because it is well positioned alongside a major access road to the town centre.

This site has been amended since consultation so it does not include land to the south above the 30m contour line. However, the original scoring above is still deemed appropriate.

Policy AL/PW5 Key Employment Areas

Policy AL/PW5: Transfesa Road (east and west) and Eldon Way

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy directs employment opportunities to the specific defined areas of Transfesa Road East and West and Eldon Way.

In general, this focus on specific areas for employment will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support employment opportunities and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/PW6: Paddock Wood Town Centre Boundary and Primary Shopping Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Town Centre Boundary and the Primary Shopping Area.

In general, this focus on specific areas for retail will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/PW7 Informal Open Space

Policy AL/PW7: Land off Nursery Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use				✓		
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Half of site falls within Flood Zone 3b, making it unsuitable for residential development. This site is allocated for informal open space in the Local Plan and is predominantly greenfield.

This site is currently used for recreational space and any alternative development would represent a loss of this community use. It is the intention that this site should be retained as open space and for this reason the Sustainability Appraisal reflects this future use. Open space is considered a water compatible use and for this reason the water/flood risk objective is given a zero.

Policy AL/PW8 Area of Landscape Importance

Policy AL/PW8: Land off Green Lane

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution					✓	
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This policy defines on the Proposals Map the Area of Landscape Importance off Green Lane.

In general, this policy to encourage retention of landscape will have a positive impact upon the health, efficient land use, pollution, water/flood risk, biodiversity and natural/built environment objectives.

Cranbrook

Policy AL/CR1: Police Station, Wheatfield Drive

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion		✓				
4	Education				✓		
5	Crime		✓				
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment				✓		
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

Site has car parking, three storey buildings and access to the Travis Perkins building trade shop to the rear. There also appears to be parking/storage beneath the Travis Perkins site to the rear of this site.

Site is fully within the AONB, inside the LBD but outside the Conservation Area.

This site is within a predominantly residential area. Any loss of service provision would need to be considered, as a police station would need to be provided for elsewhere.

However, carefully designed residential development could improve the local area and built environment. It could also improve opportunities for green infrastructure through mitigation on-site.

The site is well located for access to services in the town centre and transport links and current access to the site is good.

Policy AL/CR2: Cranbrook Library Site, Carriers Road, TN17 3JT

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion		✓				
4	Education				✓		
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site consists of the existing library buildings and surrounding green space. It is next to the primary school with some residential housing to the rear. The site is allocated for residential housing and it is assumed that the library building will be relocated to the new community facility provided for under Policy AL/CR6 (Wilkes Field).

There are several mature, mostly ornamental trees on site at the street-side NW and several young trees to the NE edge. These are not currently protected but should be given consideration as part of any development on the land. There is a steep bank to the NE.

Residential development on this site could potentially have a negative impact upon the natural environment and biodiversity objective, in addition to a negative impact upon health and social inclusion from the loss of existing local green space. From this point of view it is unlikely to represent efficient land use.

The site is within the LBD and just outside the Conservation Area.

Policy AL/CR3: The Vicarage, Waterloo Road TN17 3JQ

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a small site and so positive impact upon the housing objective will be limited. However, cumulative development of appropriate smaller sites contributes towards housing targets.

Development would potentially be well positioned for services and accessibility.

If this is a functioning vicarage with community functions operating from it, there could be considered to be a loss to service provision and social inclusion unless an alternative appropriate location can be found.

Policy AL/CR4: Land south of High Street

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education		✓				
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport			✓			
13	Waste				✓		
14	Energy			✓			
15	Employment				✓		

Summary recommendations:

Development on this site could potentially have a strong negative impact upon local landscape and the natural environment and result in the loss of greenfield land. This would also represent extension of the town boundary into sensitive landscape, which is entirely within the AONB and also includes 10% ancient woodland. The Crane Valley is positioned within a large proportion of this site; therefore the centre of the site comprises wet woodland with a steep aspect. From this point of view it does not represent efficient land use and would have a strong negative impact upon the biodiversity and natural environment objectives. It is unknown at this stage whether mitigation measures would be necessary and whether there would be flooding issues from Crane Brook, but this does seem likely and would require strong mitigation measures. There is a public footpath across this site.

Although the submitted site is large, it has only a single positive impact upon the housing objective (rather than double) because the sensitivity of the site is likely to limit possible dwelling numbers.

However, as it is adjacent to the urban area, then development would potentially be well positioned for services and accessibility. There would be possible negative impact from the point of view of increased local congestion on minor roads and access issues would need to be resolved.

The Site Allocation DPD submission draft combines this site with 'Land south of High Street and east of Orchard Way' below and refers to the whole area as 'Land Adjacent to the Crane Valley'. Combining the sites allows more homes to be built and thus is liable to create some pressure for places at the existing schools.

Policy AL/CR4: Land south of High Street and east of Orchard Way

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education		✓				
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use	✓					
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport			✓			
13	Waste				✓		
14	Energy			✓			
15	Employment				✓		

Summary recommendations:

This site needs to be considered alongside 'Land south of High Street'.

Development on this site could potentially have a strong negative impact upon local landscape and the natural environment and result in the loss of greenfield land. The site is entirely within the AONB and comprises 8.5% ancient woodland. From this point of view development does not represent efficient land use. There is also a public footpath across the site, the interruption of which would require special consideration.

Similar to 'Land south of High Street', there are water features (ponds and stream) on this site and some wet woodland. The redundant agricultural buildings do present some degradation to landscape quality.

It is unknown at this stage whether there would be flooding issues on this site and this would also require consideration and mitigation where appropriate.

An access point to existing roads would need to be established; access at Hartley Road is the most likely, but this is a fairly difficult road junction, which would need upgrading.

A well-designed scheme sympathetic to existing ecological features could have positive impact upon improved green infrastructure. There would be potential for limited opportunity for on-site increase in service provision and renewable energy schemes.

The Site Allocation DPD submission draft combines this site with 'Land South of High Street' above and refers to the whole area as 'Land Adjacent to the Crane Valley'. Combining the sites allows more homes to be built and thus is liable to create some pressure for places at the existing schools.

Policy AL/CR5: Post Office Delivery Depot and Land at Stone Street/High Street/Crane Lane

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk		✓				
10	Biodiversity			✓			
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

This site is allocated in the adopted Local Plan (2006) as mixed use, including residential. It is entirely within the Conservation Area, AONB and is an area of Archaeological Potential. It is currently vacant premises. This is a multiple ownership site and development may be phased.

Any development on this site would need to be of high quality design in order to take the natural and built environment into consideration. Mitigation measures would be needed in order to avoid the negative impacts upon the natural and built environment objective.

Potential flooding issues also need to be investigated and allowed for and, as it is previously developed land, contamination issues would also need to be considered.

As long as mitigation measures are provided, then this is likely to represent efficient land use on previously developed land.

The site is well positioned for access to service provision and access to transport links and the road network.

Policy AL/CR6: Wilkes Field, Rear of High Street/Stone Street

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health					✓	
3	Social inclusion					✓	
4	Education					✓	
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk		✓				
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

Site is former grazing land with associated buildings. This site is entirely within the AONB, 2% Conservation Area in the heart of the town. It is a sensitive site, particularly from the point of view of 'roofscape' views, as the site slopes down towards the south. In addition to this, 35% of the site is within an area of Archaeological Potential. Limited vehicle access would need to be addressed as access is limited to the site at present.

The site has considerable vegetation at the boundaries.

Loss of green space (this is mostly greenfield) is likely to have a negative impact upon the health, biodiversity and natural environment objectives unless mitigation can be provided. This forms part of the edge of Crane Valley and so there may be flooding and water issues on site.

Policy AL/CR7: Cranbrook Town Centre Boundary and Primary Shopping Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Town Centre Boundary and the Primary Shopping Area. It also gives the percentage thresholds for non-A1 (retail) uses within the Primary Shopping Area.

In general, this focus on specific areas for retail will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Hawkhurst

Policy AL/HA1: Former Springfield Garden Centre, Cranbrook Road

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment		✓				

Summary recommendations:

This site is occupied by low level industrial use and an existing vets practice so, dependent upon the proposed development, there could be a negative impact upon the employment and service provision objectives. It is within the LBD but outside the defined town centre boundary.

The site lies outside the Green Belt but fully within the AONB and there is mature woodland throughout the site therefore strong mitigation measures would be required in order to reduce the impact upon objectives for biodiversity and the natural environment. Development would need to be considered as part of the Green Infrastructure Plan.

The predicted capacity of 40 residential units means that the site would meet housing need. It would represent efficient land use from the point of view of previously developed land and there is some potential for improved biodiversity value.

Policy AL/HA2: Land at Woodham Hall, Rye Road, TN18 5DA

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use			✓			
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely within the AONB and 10% is an Area of Archaeological Potential. 27% lies within the LBD (north of the site next to the road). 2% is an Area of Landscape Importance.

The site includes the hall and surrounding land to the rear, with hedgerows, tennis courts and garden.

There is a residential access at present to the Rye Road, but any substantial development may require improved access.

It is possible that there could be some sympathetic residential development at a low density, with good quality mitigation in order to reduce the negative impact upon the natural/built environment and biodiversity objectives.

Policy AL/HA3: Hawkhurst Castle, Cranbrook Road, TN18 5EG

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision			✓			
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

This site lies entirely within the AONB and is outside the LBD.

It is previously developed land, including a recently demolished derelict residential care home, which has a current planning permission to construct a residential care home.

The site is scrubbed over and there is a boundary hedgerow with some mature trees within it. This would need to be retained and could be enhanced as part of any development.

There is good access to the A229 Cranbrook Road.

Consideration of green infrastructure could reduce any negative impact on biodiversity or the natural environment as a result of the loss of green space surrounding the demolished buildings. The site is some distance from the centre of Hawkhurst in terms of service provision and social inclusion. Putting it back into use as a commercial care home or –other mixed use, would have a positive impact upon the employment objective. Residential or care home development could contribute to meeting housing need.

Policy AL/HA4: Birchfield, Rye Road, TN18 5DA

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education			✓			
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment	✓					
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely within the High Weald AONB, which washes over the settlement of Hawkhurst. It is outside the LBD and adjacent to the site at (Land adjacent to Fowlers Park, Rye Road). Therefore it needs to be considered alongside the neighbouring site, particularly regarding access issues because the adjoining site has limited access. There is access at present to the Rye Road and this could provide potential vehicle access to both sites.

Approximately 73% of the site area is classified as Grade 2 Best and Most Versatile agricultural land, with the remaining land classified as non agricultural (approximately 27%).

A real consideration on this site would be the setting next to existing residential homes adjacent to the site, having a potential negative impact upon the built environment objective. In addition to this, there are mature trees alongside the boundary and dotted throughout the site that would need to be considered, both in terms of offering screening in landscape terms and also that views from the residential area to the west would be altered with removal of these at the roofline. In addition, this would have a negative impact upon the biodiversity and natural environment objective.

The local primary school is immediately adjacent to the site; this could, in fact, have a potential negative impact upon the education objective if buildings are taken right up to the existing tree-lined boundary but, equally, with mitigation, a positive impact could be the outcome, with potential Section 106 agreement for enhancement works.

Policy AL/HA5: Sports Pavilion King George V Playing Fields, The Moor

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment				✓		
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a recreation ground site with pavilion and outdoor play facilities. The site is allocated to provide community facilities with improved access, pavilion and outdoor play facilities.

The site lies within the Conservation Area and AONB and, although this is a low impact development, opportunities would be sought in a carefully designed scheme to respect the sensitivity of the existing built and natural environment. The scoring above reflects this.

The allocation would result in like-for-like replacement of old for new facilities thus this allocation is considered to be an efficient use of previously developed land. Furthermore, the improvements made at the site could help encourage more people to use the recreation ground and improve their fitness.

The site has some limited potential for protected species e.g. bats which would need clarifying prior to the start of works.

The site constitutes a positive impact on transport as access for pedestrians, cyclists and car drivers would be improved. In addition, improvements would be made to the existing cricket pavilion to make it more accessible thus helping to improve social inclusion particularly with regards to the existing divide between Hawkhurst Highgate and The Moor. Service provision would be improved through the modernisation of an outdoor play area and the new community facility building.

Policy AL/HA6: Gill's Green Key Employment Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy directs employment opportunities to specific defined areas.

In general, this focus on specific areas for employment will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support employment opportunities and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/HA7: Hawkhurst Town Centre Boundary and Primary Shopping Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment					✓	

Summary recommendations:

This policy defines on the Proposals Map the Town Centre Boundary and the Primary Shopping Area. It also gives the percentage thresholds for non-A1 (retail) uses within the Primary Shopping Area.

In general, this focus on specific areas for retail will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support retail and focused, appropriate design.

The impact upon the pollution, water and flood risk, biodiversity and transport objectives are more site specific and therefore they remain uncertain in this matrix that relates to the broad policy principle.

Policy AL/HA8: Recreation Open Space: Gunther Close

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This policy defines no loss of recreation open space at Gunther Close. It will only be permitted where no deficiency would result or an alternative provision is provided.

In general, this focus on recreation open space will have a positive impact upon the health, social inclusion, service provision and efficient land use objectives. As these relate to green spaces, it should also have a positive impact upon the water/flood risk, biodiversity and natural/built environment objectives.

Villages and Rural Areas

Policy AL/VRA1: Former Sissinghurst Primary School, The Street, Sissinghurst

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion					✓	
4	Education				✓		
5	Crime					✓	
6	Service provision				✓		
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity			✓			
11	Natural/built environment			✓			
12	Transport		✓				
13	Waste					✓	
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies to the north of the main road and includes a redundant school, its associated buildings, car park, playing field and church building. The church is a listed building and the whole site lies within the Conservation Area. There is a small area of Archaeological potential (2%). It lies entirely within the Limits to Built Development.

There area some specimen trees and surrounding hedgerow to the north boundary, west boundary and south-eastern corner of the site.

Pedestrian and vehicle access is good. A replacement school has already been provided on Common Road.

The site may be suitable for residential or community use, provided that the above constraints are taken into consideration. This matrix has been scored for residential use. However, in the case that this was allocated for mixed use development, this might move the service provision and employment objectives across to positive.

Policy AL/VRA2 Park and Ride Facilities

Policy AL/VRA2: Land at Woodsgate Corner, adjacent to Tesco, Pembury

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health			✓			
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution					✓	
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport						✓
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely within the AONB. This is a greenfield site that is currently grassland and scrub with a boundary of hedgerow and trees. It is outside the Limits to Built Development.

There is access to the site from the Tesco access road and access could be provided from the cycle way and public footpath at the north-west end of the site.

This site is allocated as a Park and Ride site and the matrix above has been completed to reflect this.

Policy AL/VRA3 Recreation Open Space

Policy AL/VRA3: Land to the south of Sandhurst Avenue, Sandhurst Avenue, Pembury

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely within the AONB and the Green Belt. It is outside the Limits to Built Development. 31% of the site is an Environment Agency Aquifer Protection Zone. There is a public right of way across the site.

This is a greenfield site that is currently grassland and scrub with a boundary of hedgerow and trees. The northern section of the site is used as a sports pitch.

There is an access point in the south-west corner of the site from Hastings Road.

The north section of the site is allocated for outdoor recreation and the matrix above reflects this.

Policy AL/VRA3: Land to the east of Woodside Road, Woodside Road, Pembury

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health					✓	
3	Social inclusion					✓	
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution				✓		
9	Water/flood risk					✓	
10	Biodiversity					✓	
11	Natural/built environment					✓	
12	Transport				✓		
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site lies entirely within the Green Belt and 92% within the AONB. It is outside the Limits to Built Development. The whole site is an Environment Agency Aquifer Protection Zone.

This is a greenfield site that is currently grassland with a boundary of hedgerow and trees. Roughly half of the site to the south is used as a sports pitch.

The southern section of the site is allocated as outdoor recreation and the matrix above reflects this.

Policy AL/VRA4: Brook Farm Key Employment Area

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk			✓			
10	Biodiversity			✓			
11	Natural/built environment					✓	
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment						✓

Summary recommendations:

This policy directs employment opportunities to specific defined areas.

In general, this focus on specific areas for employment will have a positive impact upon the service provision, employment and efficient land use objectives. It should also have a positive impact upon the built environment, allowing planned infrastructure to support employment opportunities and focused appropriate design.

The impact upon the water, flood risk and biodiversity objectives will depend upon any mitigation being included. Pollution and transport objectives also remain uncertain as this matrix relates to the broad area of Brook Farm.

Appendix 3: Amended Matrices for Unallocated Sites by Settlement

The following sustainability appraisal matrices are for new sites and revisions to existing sites that have come forward since the Sustainability Appraisal was issued as a draft document for consultation in March 2013. These sites came forward after the consultation process took place.

The sites are summarised in the following order:

Royal Tunbridge Wells

- Dingley Dell
- The Lodge and Gardeners Cottage, Blackhurst Lane
- Beechwood Sacred Heart School

Southborough

- Land to the north of Longfield Road and west of the A21

Cranbrook

- Land behind Webster House, High Street
- Land at Quaker Lane

Hawkhurst

- Land to South of Heartenoak Road
- Land between Garden House and White Lodge on Horns Road
- Land to the west of Streatly, Horns Road

Villages and Rural Areas

- Ridgeland Lodge, Penshurst Road, Bidborough
- Land of Sychem Place, Five Oak Green

Royal Tunbridge Wells

Dingley Dell, at junction of Rusthall Road and Langton Road, TN4 8XG - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use				✓		
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport					✓	
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is within a relatively densely wooded region which contributes to the Tunbridge Wells Conservation Area. There are good public transport links to the nearby city centre which offers ample services.

The site represents a high negative environmental impact for biodiversity and the natural environment because it is adjacent to a local wildlife site which connects to a Site of Special Scientific Interest. In addition, the mature trees on site contribute to a wildlife corridor/green infrastructure link along the length Conservation Area and into the wider countryside to the west.

The site is outside the Limits to Build development and within the Green Belt.

Between 2008-2011 the existing building on site was constructed to replace the previous dwelling. The biodiversity enhancement installed as a condition of this development going ahead would likely be impacted upon by any further development. Furthermore, topography may be a constraint on development.

The Lodge and Gardeners Cottage, Blackhurst Lane, TN2 4PX - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion				✓		
4	Education					✓	
5	Crime				✓		
6	Service provision				✓		
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity	✓					
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This site is adjacent to relatively extensive ancient woodland and entirely within a Local Wildlife Site. For these reasons, the site has been scored negatively for the biodiversity and the natural environment objectives.

Development of any kind on the site may be restricted by the topography.

Despite good service and recreation provision with Tunbridge Wells and regular bus services on nearby Pembury Road, Blackhurst Lane is not suitable for pedestrians and so residents are unlikely to utilise public transport or travel outside the site by foot.

Southborough

Land to the north of Longfield Road and west of the A21 - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion			✓			
4	Education			✓			
5	Crime				✓		
6	Service provision						✓
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk			✓			
10	Biodiversity	✓					
11	Natural/built environment	✓					
12	Transport				✓		
13	Waste				✓		
14	Energy					✓	
15	Employment			✓			

Summary recommendations:

This is a substantial greenfield site, outside of the Limits to Built Development and for which the proposed use was undecided. The scoring above reflects this unknown aspect to the site.

Negative scores for the landscape and natural environment objectives are due to the substantial encroachment upon the AONB and the presence of numerous stretches of woodland across the site. 25% of the site is classed as Ancient Woodland and, along with the likely presence of protected species, would need careful consideration in any development.

As the site is adjacent to the retail park, it would be well positioned for services and accessibility. However, the industrial feel of this area of Tunbridge Wells would leave potential residents feeling isolated and without a sense of place.

It was proposed that the site be accessed from the A21 providing good links to the strategic road network. However, the out of city position is biased towards car drivers and extensions and improvements to the bus services would be necessary to improve travel choice. In addition, public footpath WT192A would need preservation or diversion.

The substantial size of this development would provide good opportunity for generating energy from renewable sources.

Finally, due to the presence of multiple water bodies, a flood risk assessment would be required prior to development and suitable sustainable drainage solutions designed accordingly.

Cranbrook

Land behind Webster House, High Street - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

This site needs to be considered in combination with the adjoining site known as 'land south of High Street, Cranbrook' and the scoring matrix above reflects that.

The site would contribute a possible negative impact upon transport in terms of local congestion and access issues would need to be resolved. It is assumed that the access to the site would be provided by the larger adjoining site.

Biodiversity and natural environment are scored negatively as the development represents a contribution to extension of the town boundary into the sensitive landscape of the AONB.

The scoring above mirrors that of the larger adjoining site with adjustments made for the size of the site in question and the fact that is not yet know what kind of development would occur.

Land at Quaker Lane - Amended Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health		✓				
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision					✓	
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport			✓			
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This assessment represents an expansion to a site originally assessed on page 159 of the Sustainability Appraisal (Draft for Consultation - Volume 2).

The amended site now encompasses additional land to the north of the original proposal such that the site boundary is now adjacent to the buildings on Quaker Lane to the north and includes the existing pre-school. All existing access to the site would remain.

This change has not altered the original scoring shown above.

Refer to page 159 of the Sustainability Appraisal (Draft for Consultation - Volume 2) for full details.

Hawkhurst

Land to the south of Heartenoak Road, TN18 5EU - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion		✓				
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a greenfield site comprising open managed grassland with a boundary of mature trees and hedgerows. The site slopes gently in a southerly direction.

This site is in the High Weald AONB and outside the Limits to Build Development.

Access to the site would need to be on Heartenoak Road which is relatively narrow with limited capacity for large quantities of additional traffic. The proposal for 3/4 homes would be acceptable in this respect and the matrix above reflects this. However, given the area of land being put forward, the proposed density of housing was too low. In addition, the unsuitable road means walking to the nearby playing fields would be unlikely.

Although the development site adjoins housing to the west, the location is relatively rural with an infrequent bus service. Services at Hawkhurst Highgate are unlikely to be accessed by foot.

As the grassland is managed, potential for extensive protected species is low. Although, reptile mitigation is likely to be necessary and the field boundaries will need protection in any new development.

Land Between Garden House and White Lodge at Horns Road TN18 4QU - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion		✓				
4	Education		✓				
5	Crime				✓		
6	Service provision	✓					
7	Efficient land use				✓		
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a greenfield site comprising open semi-managed grass/scrub land with a boundary of mature trees and hedgerows.

This plot is an infill plot between two residential housing plots in a rural setting. However, this site is in the High Weald AONB and outside the Limits to Build Development.

Given the area of land being put forward, the density of housing proposed was low.

The location is relatively rural with an infrequent bus service. Services at Hawkhurst The Moor are relatively poor and the more comprehensive services in Hawkhurst Highgate are unlikely to be accessed by foot or public transport.

As the grassland is managed, potential for extensive protected species is low. Although, reptile mitigation is likely to be necessary and the field boundaries will need protection in any new development.

Land to the west of Streatly, Horns Road, TN18 4QT - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need					✓	
2	Health				✓		
3	Social inclusion		✓				
4	Education		✓				
5	Crime				✓		
6	Service provision	✓					
7	Efficient land use				✓		
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a greenfield site comprising grassland used for grazing with a boundary of mature vegetation and adjacent to Ancient Woodland on the northern boundary. The site slopes gently to the north.

This site is in the High Weald AONB and adjacent, but outside of, the Limits to Build Development.

The location is relatively rural with an infrequent bus service. Services at Hawkhurst The Moor are relatively poor and the more comprehensive services in Hawkhurst Highgate are unlikely to be accessed by foot or public transport.

As the grassland is managed, potential for extensive protected species is low. Although, reptile mitigation is likely to be necessary and the field boundaries will need protection in any new development.

Villages and Rural Areas

Ridgelands Lodge, Penshurst Road, Bidborough TN3 OXE - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need				✓		
2	Health				✓		
3	Social inclusion		✓				
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use		✓				
8	Pollution				✓		
9	Water/flood risk				✓		
10	Biodiversity		✓				
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment				✓		

Summary recommendations:

This is a greenfield site, outside of the limits to built development on a steep embankment which could restrict development of any kind.

The site is well screened in the short distance but, due to the elevation of the village and topography of the land, is likely to be visible from the AONB 70m north of the site.

There are no designations on or directly adjacent to the site but the site contains and is bordered by mature trees which would need consideration in any development.

Service provision in Bidborough is limited and frequent bus services are restricted to the London Road which is a 15 min walk away.

The steep topography of the site and its access road could discriminate against less mobile residents and encourage travel by car.

Land off Sychem Place, Five Oak Green TN12 6TR - New Site

SA Objective		Appraisal					
Number	Title	--	-	?	0	+	++
1	Housing need			✓			
2	Health			✓			
3	Social inclusion			✓			
4	Education				✓		
5	Crime				✓		
6	Service provision		✓				
7	Efficient land use					✓	
8	Pollution			✓			
9	Water/flood risk				✓		
10	Biodiversity				✓		
11	Natural/built environment		✓				
12	Transport		✓				
13	Waste				✓		
14	Energy				✓		
15	Employment			✓			

Summary recommendations:

This is a small brownfield site comprising hard standing, buildings and stockpiles of vegetation. The site lies within the Green Belt and outside the LBD.

It currently offers employment as a fencing and security company's yard and is adjacent to residential housing. Access to the site is narrow and could preclude development.

Five Oak Green provides very basic amenities but residents have to travel to Paddock Wood for more comprehensive services. Paddock Wood is a 15 min bus ride away but the service is infrequent.

There are mature trees and a drainage channel along the southern boundary that would need consideration in any development. Given the current use of the site, there is potential for contaminated land.

It is not known whether the site would comprise residential or commercial development and the above matrix reflects that.

Appendix 4: Measures to Increase the Sustainability of the DPD

As part of the cumulative appraisal of allocated sites, measures to increase sustainability were proposed for each settlement to reduce any adverse impacts identified and to enhance beneficial impacts (Section 7).

As part of the iterative SA process, the Council has considered these suggestions and whether they are best incorporated into the draft Site Allocations DPD (under the development parameters of the relevant sites) or whether they are, or should be, implemented through other means.

The proposed mitigation measures and the Council's response are set out for each settlement in the following tables.

The Council's response is indicated according to the following key:

CP ...	Mitigation proposal covered by a policy in the Core Strategy
SA DPD	Mitigation proposal included in the development parameters of the site allocation in the DPD
CSR	Mitigation proposal should be included in the upcoming Core Strategy Review
Conditions	Mitigation proposal generally incorporated in standard planning conditions
KCC	KCC is the responsible authority for implementing this proposal

Table A4.1: Royal Tunbridge Wells – measures to increase sustainability and the Council's response

SA Objective		Proposed Mitigation	Council's Response
1	Housing need	None	
2	Health	<ul style="list-style-type: none"> Opportunities should be sought to incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. 	CP3, CP4, CP8
		<ul style="list-style-type: none"> Opportunities to create/enhance a network of interconnected green open spaces suitable for informal recreation and formal recreation and play space which could benefit health objectives through promoting walking, cycling and general well-being and by helping to maintain air quality. 	CP3, CP8
		<ul style="list-style-type: none"> Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments. 	CP3, CP8
		<ul style="list-style-type: none"> Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions. 	Conditions
3	Social Inclusion	<ul style="list-style-type: none"> Opportunities should be sought to incorporate measures to promote access to the town centre, open 	CP3, CP4, CP8

Table A4.1: Royal Tunbridge Wells – measures to increase sustainability and the Council's response

SA Objective		Proposed Mitigation	Council's Response
		countryside, recreation and community facilities by foot and bicycle.	
		<ul style="list-style-type: none"> At Knights Park/Knights Way, mixed use including the provision of local services should be sought. 	SA DPD
4	Education	None	
5	Crime	None	
6	Service Provision	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Where redevelopment may cause a loss of or place strain on existing services or facilities, alternative provision should be sought on-site or off-site to maintain or enhance access to services and facilities. 	CP8 SA DPD
		<ul style="list-style-type: none"> Any development should seek to maintain or enhance local employment opportunities. 	CP7
		<ul style="list-style-type: none"> At Knights Park/Knights Way mixed use including the provision of local services should be sought. 	SA DPD
7	Efficient land use	<ul style="list-style-type: none"> Seek efficient use of land within the greenfield sites to retain a network of green open space particularly that with landscape, biodiversity, natural drainage or heritage value. 	CP4 SA DPD
8	Pollution	<ul style="list-style-type: none"> Temporary adverse impacts during the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality. 	CP8 CP4
		<ul style="list-style-type: none"> Seek to minimise congestion on local roads arising from the developments. 	CP3, CP4, CP8
		<ul style="list-style-type: none"> Encourage Low Emissions Strategies, particularly within the AQMA, in accordance with paragraph 5.118 of the Core Strategy. 	SA DPD
		<ul style="list-style-type: none"> At Knights Park/Knights Way mixed use including the provision of local services should be sought. 	SA DPD
9	Water/flood risk	<ul style="list-style-type: none"> Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain or enhance natural drainage 	KCC* CP5

Table A4.1: Royal Tunbridge Wells – measures to increase sustainability and the Council's response			
SA Objective		Proposed Mitigation	Council's Response
			SA DPD
		<ul style="list-style-type: none"> Ensure that quality of surface water features such as ponds and streams are maintained 	CP5
		<ul style="list-style-type: none"> Require development on sites affected by flooding issues to incorporate any necessary flood prevention and mitigation measures. 	KCC* SA DPD
		<ul style="list-style-type: none"> Ensure the layout and location of development within the greenfield sites takes into account natural drainage. 	KCC* SA DPD
		<ul style="list-style-type: none"> Seek to create/enhance the network of interconnected green open spaces which could benefit natural drainage and reduce flood risk. 	CP3, CP4 CP8 SA DPD
10	Biodiversity	<ul style="list-style-type: none"> Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space. Retain ancient woodland. 	CP4, CP5, CP9 SA DPD
		<ul style="list-style-type: none"> Incorporate measures to enhance the biodiversity value of the sites, particularly the previously developed sites which currently have little or no vegetation. 	CP4, CP9 SA DPD
		<ul style="list-style-type: none"> Seek to create or enhance a network of interconnected green open spaces which could benefit biodiversity by providing linked habitats. 	CP3, CP4, CP8, CP9 SA DPD
		<ul style="list-style-type: none"> Maintain or enhance the biodiversity of any Commons Land or woodland which is designated as a Local Wildlife Site. 	CP4, CP9 SA DPD
		<ul style="list-style-type: none"> Ensure that any development does not have a negative impact on adjoining sites designated for biodiversity value, including LWSs and SLNCVs. 	CP4, CP9 SA DPD
11	Natural/built environment	<ul style="list-style-type: none"> Existing woodland, specimen trees and hedgerows should be protected and enhanced where possible. 	CP4 SA DPD
		<ul style="list-style-type: none"> Any development on edge of settlement sites adjoining and within the AONB should pay particular attention to enhancing the landscape setting of the town. 	CP4 SA DPD

Table A4.1: Royal Tunbridge Wells – measures to increase sustainability and the Council's response			
SA Objective		Proposed Mitigation	Council's Response
		<ul style="list-style-type: none"> Any development should maintain or enhance the character and setting of the Royal Tunbridge Wells Conservation Area and listed buildings. 	CP4 SA DPD
		<ul style="list-style-type: none"> All development should be required to conserve/enhance local character and distinctiveness. 	CP4, CP5 SA DPD** CSR
12	Transport	<ul style="list-style-type: none"> Any site masterplans should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle. 	CP3, CP4, CP9 SA DPD
		<ul style="list-style-type: none"> Any development of sites should ensure that there is no negative impact on transport choice through the loss of the bus depot and parking. Alternative provision should be made if deemed necessary. 	Parking in SA DPD. Bus Depot location does not necessarily affect level of local service.
		<ul style="list-style-type: none"> At Knights Park/Knights Way, mixed use including the provision of local services should be sought to reduce the need to travel. 	SA DPD
13	Waste	None	
14	Energy	None	
		<ul style="list-style-type: none"> Ensure that sufficient employment land is allocated to offset any potential loss of employment through the redevelopment of allocated sites. 	CP7 SA DPD

* KCC will be Lead Local Flood Authority responsible for SuDS implementation under the Floods and Water Management Act 2010. A Draft Local Flood Risk Management Strategy is being prepared by KCC.

** Policy AL/RTW1 for the Site Allocations DPD (Royal Tunbridge Wells only).

Table A4.2: Southborough – measures to increase sustainability and the Council's response			
SA Objective		Proposed Mitigation	Council's Response
1	Housing need	<ul style="list-style-type: none"> Seek an element of housing as part of the mixed use of Southborough Hub. 	SA DPD
2	Health	<ul style="list-style-type: none"> All proposals should incorporate measures to promote access to Southborough town centre, open 	CP3, CP4, CP8

SA Objective		Proposed Mitigation	Council’s Response
		countryside, recreation and community facilities by foot and bicycle.	SA DPD
		<ul style="list-style-type: none"> Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments. 	CP3, CP8 SA DPD
		<ul style="list-style-type: none"> Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> All proposals should incorporate measures to promote access to Southborough town centre, open countryside, recreation and community facilities by foot and bicycle. 	CP3, CP4, CP8 SA DPD
3	Social Inclusion	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance non-car access to facilities and the countryside. 	SA DPD
		<ul style="list-style-type: none"> Ensure that the community hub allocated under Policy AL/SO2 retains and enhances the range of accessible facilities and services in Southborough town centre and that any loss of recreation open space is minimised. 	SA DPD
4	Education	None	
5	Crime	None	
6	Service Provision	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Ensure that the community hub allocated under Policy AL/SO2 retains and enhances the range of facilities and services in Southborough town centre and that any loss of recreation open space is minimised. 	CP8 SA DPD
		<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP7, CP8 SA DPD
		<ul style="list-style-type: none"> Ensure that the community hub allocated under Policy AL/SO2 retains and enhances the range of facilities and services in Southborough town centre and that any loss of recreation open space is minimised. 	SA DPD

Table A4.2: Southborough – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
7	Efficient land use	None	
8	Pollution	<ul style="list-style-type: none"> Temporary negative effects during the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality. 	CP8, CP4
		<ul style="list-style-type: none"> Seek to minimise congestion on the A26 and residential roads arising from the developments. 	CP3 SA DPD
		<ul style="list-style-type: none"> Ensure a network of foot and cycle paths that will encourage non-motorised forms of transport, particularly within the AQMA and AQMA buffer zone. 	CP3, CP4, CP8 SA DPD
9	Water/flood risk	<ul style="list-style-type: none"> Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain or enhance natural drainage. 	KCC* CP5 DMP DPD
		<ul style="list-style-type: none"> Ensure the layout and location of development takes into account the natural drainage value of green open space and vegetation. 	KCC* CP5 CSR
10	Biodiversity	<ul style="list-style-type: none"> Where possible conserve or enhance trees and hedgerows on site and retain/introduce areas of green open space. 	CP4, CP5
		<ul style="list-style-type: none"> Incorporate measures to protect and enhance the biodiversity value of the sites. 	CP4
11	Natural/built environment	<ul style="list-style-type: none"> Any development along the A26 should seek to enhance the townscape and character of this important access route and of Southborough town centre. 	AL/RTW1** CP4
		<ul style="list-style-type: none"> Where possible conserve or enhance trees and hedgerows on site, particularly those designated for landscape value and retain/introduce areas of green open space. 	CP4, CP5, CP8 SA DPD
		<ul style="list-style-type: none"> All development should be required to conserve/enhance local character and distinctiveness. 	CSR

SA Objective		Proposed Mitigation	Council’s Response
12	Transport	<ul style="list-style-type: none"> Site layouts should incorporate measures to promote access to local services, the open countryside and public transport by foot and bicycle. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> The impact on local businesses of any loss of car parking in Yew Tree Road should be considered and alternative provision made if appropriate. 	SA DPD
		<ul style="list-style-type: none"> Require that new development should not significantly increase traffic movements on the A26 and local roads. 	CP3
13	Waste	None	
14	Energy	None	
15	Employment	None	

* KCC will be Lead Local Flood Authority responsible for SuDS implementation under the Floods and Water Management Act 2010. A Draft Local Flood Risk Management Strategy is being prepared by KCC.

** Policy AL/RTW1 for the Site Allocations DPD (Royal Tunbridge Wells and Southborough) only.

SA Objective		Proposed Mitigation	Council’s Response
1	Housing need	None	
2	Health	<ul style="list-style-type: none"> Any site masterplans should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. 	CP3, CP4, CP8
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating green corridors within and connecting the sites which could benefit health objectives through promoting walking, cycling and general well-being. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments. 	CP3, CP8
		<ul style="list-style-type: none"> Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions. 	Conditions

Table A4.3: Paddock Wood – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
3	Social Inclusion	<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could benefit social inclusion through promoting walking and cycling networks and access to green open space. 	CP3, CP4, CP8 SA DPD
4	Education	None	
5	Crime	None	
6	Service Provision	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which improve pedestrian and bicycle access to local facilities and provide accessible green open space. 	CP3, CP4, CP8 SA DPD
7	Efficient land use	<ul style="list-style-type: none"> Seek efficient use of land within the greenfield sites to retain green open space particularly that with landscape, biodiversity, natural drainage or heritage value. 	CP4 SA DPD
8	Pollution	<ul style="list-style-type: none"> Temporary negative effects during the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> Retaining green open space, trees and hedges and requiring structural landscaping will retain some function as carbon sink, thereby reducing carbon dioxide emissions. 	CP8, CP4 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could improve air quality and green house gas emissions. 	CP3, CP4, CP8 SA DPD
9	Water/flood risk	<ul style="list-style-type: none"> Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain natural drainage. 	KCC* CP11, P5 CSR
		<ul style="list-style-type: none"> Ensure that quality of surface water features such as ponds and streams is maintained. 	CP5

SA Objective		Proposed Mitigation	Council’s Response
		<ul style="list-style-type: none"> Require development to incorporate flood prevention and mitigation measures for both the site and wider settlement area. 	CP11 SA DPD
		<ul style="list-style-type: none"> Ensure the layout and location of development within the greenfield sites takes into account natural drainage, biodiversity and landscape value of low lying areas and water features. 	KCC* CP5 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could benefit natural drainage and reduce flood risk. 	CP3, CP4 CP8 SA DPD
10	Biodiversity	<ul style="list-style-type: none"> Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space. 	CP4, CP5 SA DPD
		<ul style="list-style-type: none"> Incorporate measures to protect and enhance biodiversity value of the sites. 	CP4 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could benefit biodiversity by providing linked, linear habitats. 	CP3, CP4, CP8 SA DPD
11	Natural/built environment	<ul style="list-style-type: none"> Any site master plans should seek to enhance the eastern edge and landscape setting of Paddock Wood. 	CP4 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could benefit the quality of the townscape. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> All development should be required to conserve/enhance local character and distinctiveness. 	CSR
12	Transport	<ul style="list-style-type: none"> Any site master plans should incorporate measures to promote access to local services. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> The residential allocations (Policies AL/PW3 and AL/PW4) on the eastern and southern edges of 	CP3, CP4, CP8

Table A4.3: Paddock Wood – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
		Paddock Wood offer the possibility of incorporating a green corridor connecting the sites which could promote walking.	SA DPD
13	Waste	None	
14	Energy	None	
15	Employment	None	

*KCC will be Lead Local Flood Authority responsible for SuDS implementation under the Floods and Water Management Act 2010. A Draft Local Flood Risk Management Strategy is being prepared by KCC.

Table A7.4: Cranbrook – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
1	Housing need	None	
2	Health	<ul style="list-style-type: none"> Any site masterplans should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> The coordinated development of sites adjoining the Crane Valley offers the possibility of incorporating a network of interconnected green open spaces suitable for informal recreation and formal recreation and play space which could benefit health objectives through promoting walking, cycling and general well-being and by helping to maintain air quality. 	CP3, CP8 SA DPD
		<ul style="list-style-type: none"> Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments. 	CP3, CP8 SA DPD
		<ul style="list-style-type: none"> Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions. 	Conditions
3	Social Inclusion	<ul style="list-style-type: none"> Ensure that the masterplan for sites adjoining the Crane Valley maximises the provision of publicly accessible informal and formal recreation open space including play space. 	SA DPD
4	Education	None	
5	Crime	None	

SA Objective		Proposed Mitigation	Council’s Response
6	Service Provision	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Ensure that the masterplan for sites adjoining the Crane Valley requires a comprehensive network of foot and cycle paths within the development and connecting to the town centre. 	SA DPD
7	Efficient land use	<ul style="list-style-type: none"> Seek efficient use of land within the greenfield sites to retain a network of green open space particularly that with landscape, biodiversity, natural drainage or heritage value. 	CP4 SA DPD
8	Pollution	<ul style="list-style-type: none"> Temporary adverse effects during the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> Retaining green open space, trees and hedges and requiring structural landscaping will help to maintain air quality. 	CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Ensure that the masterplan for sites adjoining the Crane Valley requires a network of green open spaces. 	SA DPD
		<ul style="list-style-type: none"> Ensure that the water quality of the Crane River and other streams and ponds is protected and/or enhanced. 	CP5 SA DPD
		<ul style="list-style-type: none"> Seek to minimise congestion on local roads arising from the developments. 	CP3, CP4, CP8 SA DPD
9	Water/flood risk	<ul style="list-style-type: none"> Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain natural drainage. 	KCC* CP5 CSR
		<ul style="list-style-type: none"> Ensure that quality of surface water features such as ponds and streams is maintained. 	CP5
		<ul style="list-style-type: none"> Require development on sites where flooding is an issue to incorporate any necessary flood prevention and mitigation measures. 	KCC* CP5
		<ul style="list-style-type: none"> Ensure the layout and location of development within the greenfield sites takes into account natural 	KCC*

Table A7.4: Cranbrook – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
		drainage, biodiversity and landscape value of water features.	CP5 SA DPD
		<ul style="list-style-type: none"> The coordinated development of sites adjoining the Crane Valley offers the possibility of incorporating a network of interconnected green open spaces which could benefit natural drainage and reduce flood risk. 	CP3, CP4, CP8 SA DPD
10	Biodiversity	<ul style="list-style-type: none"> Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space. 	CP4, CP5 SA DPD
		<ul style="list-style-type: none"> Incorporate measures to protect and enhance biodiversity value of the sites, particularly in the Crane Valley. 	CP4
		<ul style="list-style-type: none"> The coordinated development of sites adjoining the Crane Valley offers the possibility of incorporating a network of interconnected green open spaces which could benefit biodiversity by providing linked habitats. 	CP3, CP4, CP8 SA DPD
11	Natural/built environment	<ul style="list-style-type: none"> Any site masterplans should seek to enhance the western edge and landscape setting of Cranbrook and to preserve or enhance the AONB. 	CP4 SA DPD
		<ul style="list-style-type: none"> Any development should maintain or enhance the setting of the Cranbrook Conservation Area and listed buildings. 	CP3, CP4
		<ul style="list-style-type: none"> The coordinated development of sites adjoining the Crane Valley offers the possibility of incorporating a network of interconnected green open spaces which could benefit the quality of the townscape. 	CP3, CP4 SA DPD
12	Transport	<ul style="list-style-type: none"> Any site masterplans should incorporate measures to promote access to local services. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> The coordinated development of sites adjoining the Crane Valley offers the possibility of incorporating a network of roads. 	CP3, CP4, CP8 SA DPD
13	Waste	None	
14	Energy	None	
15	Employment	None	

SA Objective		Proposed Mitigation	Council’s Response
1	Housing need	None	
2	Health	<ul style="list-style-type: none"> Any site proposals should incorporate measures to promote access to the town centre, open countryside, recreation and community facilities by foot and bicycle. 	CP3, CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Local recreational, open space, cultural and community facilities should be retained or enhanced to meet any increase in demand created through these developments. 	CP3, CP8 SA DPD
		<ul style="list-style-type: none"> Temporary negative impacts on health and well-being associated with the construction phase should be minimised by appropriate planning conditions. 	Conditions
3	Social Inclusion	None	
4	Education	None	
5	Crime	None	
6	Service Provision	<ul style="list-style-type: none"> Improvements to the footpath and cycle network should be sought as part of any development proposals to protect or enhance access to facilities and the countryside. 	CP3, CP4, CP8 SA DPD
7	Efficient land use	<ul style="list-style-type: none"> Seek efficient use of land within the greenfield sites to retain green open space particularly that with landscape, biodiversity, natural drainage or heritage value. 	CP4 SA DPD
8	Pollution	<ul style="list-style-type: none"> Temporary negative effects during the construction phase should be minimised by appropriate planning conditions. 	Conditions
		<ul style="list-style-type: none"> Retaining green open space, trees and hedges and requiring structural landscaping will retain some function as carbon sink, thereby reducing carbon dioxide emissions. 	CP4, CP8 SA DPD
		<ul style="list-style-type: none"> Land off Highgate Hill on the western edge of Hawkhurst offers the possibility of incorporating a green corridor within the sites which could improve air quality and greenhouse gas emissions. 	CP3, CP4, CP8 SA DPD
9	Water/flood risk	<ul style="list-style-type: none"> Sustainable drainage systems (SuDS) and soft landscaping should be required to maintain natural drainage. 	KCC* CP5

Table A4.5: Hawkhurst – measures to increase sustainability and the Council’s response

SA Objective		Proposed Mitigation	Council’s Response
		<ul style="list-style-type: none"> Ensure that quality of surface water features such as ponds and streams is maintained. 	CP5
		<ul style="list-style-type: none"> Land off Highgate Hill on the western edge of Hawkhurst offers the possibility of incorporating a green corridor within the sites which could benefit natural drainage. 	CP3, CP4, CP8 SA DPD
10	Biodiversity	<ul style="list-style-type: none"> Where possible conserve or enhance water features, trees and hedgerows on site and retain interconnected green open space. 	CP4 SA DPD
		<ul style="list-style-type: none"> Incorporate measures to protect and enhance biodiversity value of the sites. 	CP4 SA DPD
		<ul style="list-style-type: none"> Land off Highgate Hill on the western edge of Hawkhurst offers the possibility of incorporating a green corridor within the sites which could benefit biodiversity by providing linked, linear habitats. 	CP3, CP4, CP8 SA DPD
11	Natural/built environment	<ul style="list-style-type: none"> Any site masterplans should seek to enhance the rural/urban edge and landscape setting of Hawkhurst and to protect the character of the AONB. 	CP4 SA DPD
		<ul style="list-style-type: none"> Land off Highgate Hill on the western edge of Hawkhurst offers the possibility of incorporating a green corridor within the sites which could benefit the quality of the townscape. 	CP3, CP4 SA DPD
		<ul style="list-style-type: none"> Ensure that any development on sites allocated in Policies AL/HA1 and AL/HA2 conserve and enhance the setting of listed buildings in the vicinity and, in the case of AL/HA1 the Hawkhurst Conservation Area. 	CP4 SA DPD
		<ul style="list-style-type: none"> All development should be required to conserve/enhance local character and distinctiveness. 	CSR
		<ul style="list-style-type: none"> Any site masterplans should seek to enhance the rural/urban edge and landscape setting of Hawkhurst and to protect the character of the AONB. 	CP4 SA DPD
12	Transport	<ul style="list-style-type: none"> Any site masterplans should incorporate measures to promote access to local services. 	CP3, CP4, CP8 SA DPD

SA Objective		Proposed Mitigation	Council’s Response
		<ul style="list-style-type: none"> Land off Highgate Hill offers the possibility of incorporating a green corridor within the sites which could promote walking. 	CP3, CP4, CP8 SA DPD
13	Waste	None	
14	Energy	None	
15	Employment	None	

Appendix 5: the National Planning Policy Framework and Implications for the Draft Site Allocations DPD

The National Planning Policy Framework (NPPF) was published in March 2012 and indicates that to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The NPPF contains a presumption in favour of sustainable development and states that the planning system should play an active role in guiding development to sustainable locations. Sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment as well as in people's quality of life. Plans need to take local circumstances into account and proposed development that accords with an up-to-date local plan should be approved and that which conflicts should be refused unless other material considerations indicate otherwise.

In March 2014 the Government published Planning Practice Guidance on strategic environmental assessment and sustainability appraisal which provides further advice on how sustainability appraisal should be built into the local plan making process. This SA Report conforms to this latest guidance.

The NPPF sets out 12 core land-use planning principles which should underpin plan-making. These require that planning should be:

1. Plan-led
2. Creative in finding ways to enhance and improve the places in which people live their lives
3. Proactively drive and support sustainable economic development
4. Always seek to secure high quality design and a good standard of amenity
5. Take account of the different roles and character of different areas
6. Support the transition to a low carbon future in a changing climate
7. Contribute to conserving and enhancing the natural environment and reducing pollution
8. Encourage the effective use of land
9. Promote mixed use developments and encourage multiple benefits from the use of land
10. Conserve heritage assets
11. Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling
12. Take account of and support local strategies to improve health, social and cultural wellbeing for all

Some of the key messages of the NPPF with relevance to the Draft Site Allocations DPD are set out below:

Building a strong, competitive economy

Significant weight should be placed on the need to support economic growth through the planning system. In drawing up local plans, LPAs should set criteria and identify strategic sites to meet anticipated needs over the plan period, support existing business sectors and plan positively for knowledge driven, creative or high technology industries. They are required to identify priority areas for economic regeneration, infrastructure provision and environmental enhancement and to facilitate flexible working practices such as the integration of residential and commercial uses. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose.

Ensuring the vitality of town centres

Planning policies should allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. The need for town centre uses should be met in full and not compromised by limited site availability. Where sites are limited, the NPPF suggests that it may be necessary to assess the need to expand town centres and allocate appropriate edge of centre sites.

Supporting a prosperous rural economy

Local plans should support the sustainable growth and expansion of business and enterprise in rural areas, promote the development and diversification of land-based rural businesses, support sustainable rural tourism and leisure developments and promote the retention and development of local services and community facilities in villages.

Promoting sustainable transport

Plans should ensure developments that generate significant movement are located where the need to travel is minimised and the use of sustainable transport modes can be maximised. For larger scale residential developments in particular, planning policies should promote a mix of uses.

Delivering a wide choice of high quality homes

To boost significantly the supply of housing, local planning authorities should ensure that their Local Plan meets the full needs for market and affordable housing and identify key sites. They are required to identify a five year supply of specific deliverable sites and a supply of sites and broad locations for 6-10 years and where possible 11-15 years. It requires Local Authorities to plan for a suitable mix of housing. To promote sustainable development in rural areas, housing should be located where it will enhance or maintain vitality in rural communities.

Promoting healthy communities

Planning policies should plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Protecting Green Belt Land

Great importance continues to be attached to Green Belts. Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. When reviewing Green Belt boundaries Local Planning Authorities should take account of the need to promote sustainable patterns of development.

Meeting the challenge of climate change, flooding and coastal change

Local Authorities should plan for new development in locations and ways which reduce greenhouse gas emissions and consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. The Sequential Test should be used to steer new development to areas with the lowest probability of flooding and if development is necessary in flood risk areas it should be made safe without increasing flood risk elsewhere.

Conserving and enhancing the natural environment

Plans should allocate land with the least environmental or amenity value and should encourage the effective use of land by reusing previously developed land provided that it is not of high environmental value. Local authorities should plan for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Great weight should be given to conserving the landscape and scenic beauty in Areas of Outstanding Natural Beauty. The conservation of wildlife and cultural heritage are important in all areas. Local authorities should identify and map components of the local ecological networks.

Conserving and enhancing the historic environment

Local planning authorities should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. They should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance.

Plan-making

In relation to the plan making process the NPPF states that Local Planning Authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Local Plans should plan positively for the development and infrastructure required in the area and allocate sites to promote development and flexible use of land (bringing forward new land where necessary) and provide detail on form, scale, access and quantum of development where appropriate. Local planning authorities should also identify land where development would be inappropriate.

Sustainability appraisal

The NPPF confirms that a sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process.

Neighbourhood planning

The NPPF contains guidance on neighbourhood planning and how local people can ensure that they get the right types of development for their community.

Appendix 6: Baseline Sources

The following sources were used in the preparation of updated baseline data in Section 4 of the report.

Environment	<p>Tunbridge Wells Borough Council, Authority Monitoring Report 2012</p> <p>Other Tunbridge Wells Borough Council data</p> <p>Borough Landscape Character Assessment and Capacity Study 2002 and 2009</p> <p>Environment Agency, "What's in your backyard?" website</p> <p>South East Water and Southern Water, Water Management Plans 2010-2035</p> <p>Strategic Flood Risk Assessment (SFRA) 2007</p> <p>Strategic Flood Risk Assessment (SFRA) Level 2 2009</p> <p>Tunbridge Wells Borough Council, Air Quality Management Report 2011</p> <p>Tunbridge Wells Borough Council website (recycling figures)</p> <p>Tunbridge Wells Borough Agricultural Land Classification Study 2014</p>
Economy	<p>Tunbridge Wells Borough Council, Authority Monitoring Report 2012</p> <p>Tunbridge Wells Borough Council, Economic Development Strategy 2011</p> <p>NOMIS, Office for National Statistics</p> <p>Retail and Leisure Study 2014 Update</p> <p>Employment Land Review Update 2010</p> <p>Kent Travel Report 2011</p> <p>Annual Survey of Hours and Earnings 2010</p> <p>The Economic Impact of Tourism on Borough of Tunbridge Wells 2009, Tourism South East Research Unit</p>
Society	<p>Tunbridge Wells Borough Council Authority Monitoring Report 2012</p> <p>Kent County Council Population Forecasts 2012</p> <p>Office for National Statistics 2011 Census</p> <p>Tunbridge Wells Borough Council PPG17 Sport, Recreation and Open Space Study 2007</p> <p>Tunbridge Wells Borough Council, House Condition Survey 2009</p> <p>Borough Survey 2010</p>

If you require this document in another format, please contact:

**Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall
ROYAL TUNBRIDGE WELLS
Kent TN1 1RS**

Tel: 01892 554056

Email: planning.policy@tunbridgewells.gov.uk