

TONBRIDGE & MALLING BOROUGH COUNCIL



EXECUTIVE SERVICES

Chief Executive

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NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Committee Services
committee.services@tmbc.gov.uk

27 June 2016

To: MEMBERS OF THE PLANNING AND TRANSPORTATION ADVISORY BOARD

(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Planning and Transportation Advisory Board to be held in the Civic Suite, Gibson Building, Kings Hill, West Malling on Tuesday, 5th July, 2016 commencing at 7.30 pm

Yours faithfully

JULIE BEILBY

Chief Executive

A G E N D A

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The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

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Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr D A S Davis (Chairman)
Cllr T Edmondston-Low (Vice-Chairman)

Cllr M A C Balfour
Cllr Mrs S M Barker
Cllr P F Bolt
Cllr V M C Branson
Cllr M O Davis
Cllr B T M Elks
Cllr Mrs S M Hall

Cllr Mrs F A Kemp
Cllr R D Lancaster
Cllr M Parry-Waller
Cllr S C Perry
Cllr R V Roud
Cllr A K Sullivan
Cllr M Taylor

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Apologies for absence

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

PLANNING AND TRANSPORTATION ADVISORY BOARD

Tuesday, 12th January, 2016

Present: Cllr D A S Davis (Chairman), Cllr Miss S O Shrubsole (Vice-Chairman), Cllr M A C Balfour, Cllr Mrs S M Barker, Cllr P F Bolt, Cllr V M C Branson, Cllr T Edmondston-Low, Cllr B T M Elks, Cllr Mrs F A Kemp, Cllr R D Lancaster, Cllr L J O'Toole, Cllr M Parry-Waller, Cllr S C Perry, Cllr R V Roud and Cllr A K Sullivan

Councillors Mrs J A Anderson, O C Baldock, M A Coffin, D J Cure, R W Dalton, M O Davis, Mrs T Dean, N J Heslop, D Lettington, Mrs S L Luck, B J Luker, M R Rhodes and H S Rogers were also present pursuant to Council Procedure Rule No 15.21.

An apologies for absence was received from Councillors M Taylor

PE 16/1 DECLARATIONS OF INTEREST

There were no declarations made in accordance with the Code of Conduct.

However, the Advisory Board noted the following:

- Councillor Balfour informed that he was the Cabinet Member for Environment and Transport at Kent County Council.
- Councillor Mrs Dean advised that she was a Member of Kent County Council and represented Malling Central division. She was also Chairman of West Malling Parish Council.
- Councillor Mrs Luck informed that she was a member of the West Malling Chamber of Commerce.

PE 16/2 MINUTES

RESOLVED: That the notes of the meeting of the Planning and Transportation Advisory Board held on 8 September 2015 be approved as a correct record and signed by the Chairman.

MATTERS FOR RECOMMENDATION TO THE CABINET

PE 16/3 REVIEW OF CAR PARKING FEES AND CHARGES

The joint report of the Director of Street Scene, Leisure and Technical Services and the Director of Finance and Transformation set out recommendations for car parking fees and charges for implementation from 1 April 2016. In addition, the report identified a number of fees and

charges for review over the forthcoming year and outlined the Borough Council's ongoing investment in the parking service.

Careful consideration was given to the options set out and Members noted that, whilst the Council regularly reviewed its fees and charges for services provided for the local community, the last annual review of car parking charges in 2015 did not recommend any increases or other changes. Consequently, there had been no increase in any parking charges in the Borough for the last two years.

Members were advised of a petition from West Malling Parish Council asking that short term parking remain free in the town. The petition comprising over 2,500 signatures had been received immediately prior to the meeting and would be dealt with in accordance with the Council's Petition Scheme.

The views of the Tonbridge Sports Association regarding Lower Castle Fields car park, Tonbridge were referenced and the Cabinet Member for Planning and Transportation offered to discuss how to minimise the effect on sports users with the organisation.

RECOMMENDED: That the following proposals be approved by Cabinet with effect from 1 April 2016:

- (1) the schedule of charges for short and long stay parking in Tonbridge shown in Table 1 to the report be introduced;
- (2) the schedule of charges for parking in Lower Castle Fields car park shown in Table 2 be introduced;
- (3) the schedules of Peak and Off-Peak Season ticket charges in Tonbridge shown in Tables 3 and 4 be adopted;
- (4) the schedules of charges for short and long stay parking in West Malling shown in Table 6 be introduced, with the exception of the 'over 3 hour' option which would be deleted and having noted the receipt of a petition;
- (5) the schedule of charges for Blue Bell Hill car park shown in Table 7 be introduced, subject to reviewing levels of charging increase within the context of extending the charging period to include a charge for Saturday;
- (6) the schedule of charges for parking in Borough Green Western Road car park shown in Table 8 be introduced, subject to the introduction of a 30 minute tariff at 10p, 20p for 1 hour and 40p for 2 hours;

- (7) Residents permits be increased to £40 applied across the whole Borough and Officers investigate further options for the introduction of tiered pricing structure for parking permits for more than one vehicle per residential household;
- (8) the schedule of charges for business permits and dispensation shown in Table 9 be introduced, subject to clarification over the dispensation period and definition of the dispensations;
- (9) visitor permits be increased to £12 for a book of 10 permits;
- (10) the schedule of charges for Haysden and Leybourne Lakes country parks shown in Table 10 be introduced;
- (11) the schedule of charges for on-street pay & display parking in Tonbridge be introduced but amended to be consistent with the proposed short stay charges in Table 1 for periods of up to 3 hours; and
- (12) separate reviews be brought forward on Evening and Sunday charging, on existing car parking concessions and those car parks not addressed within the report.

***Referred to Cabinet**

PE 16/4 REVIEW OF PRE-APPLICATION PLANNING PROCEDURES AND CHARGING REGIME

The report of the Director of Planning, Housing and Environmental Health presented a review of the procedures and practice adopted in providing advice and guidance in respect of planning matters, in particular assistance provided to those intending to submit planning applications. Importantly, the report also reviewed the charges made for the service and recommended a new regime to reflect the costs and value of the advice provided.

Members recognised that there were significant costs involved in providing good quality pre-application advice and although this was highly beneficial to the planning application process and local communities it was now appropriate to critically review charges in the context of increasing focus on service efficiency.

A summary of the different charging regimens for all the local planning authorities in Kent was provided in Annex 1 to the report. Details of the proposed new pre-application protocol, together with the fee structure and pre-application form were set out in Annexes 2 and 3 respectively.

The financial and value for money considerations set out in the report were noted by Members.

RECOMMENDED: That the following proposals be approved by Cabinet with effect from 1 April 2016:

- (1) the Protocol for providing Pre-application advice be adopted, as attached at Annex 2 to the report; and
- (2) the Pre-application Charging Schedule 2016/17 be introduced as attached at Annex 3 to the report

***Referred to Cabinet**

PE 16/5 BUILDING CONTROL SHARED SERVICE

Decision Notice D160005MEM

Details were provided of the progress made since the start of the Building Control Partnership with Sevenoaks District Council in October 2014. A number of initiatives and benefits, which helped deliver improved ways of working and efficiencies, were outlined in the report and Members expressed satisfaction at the progress made.

Proposed service improvements for the next 12 months were also set out, together with an approach for reviewing building control fees and charges.

RECOMMENDED: that

- (1) the progress with the shared service arrangements be noted;
- (2) the proposed Service Improvements for 2016/17 be endorsed; and
- (3) the approach to reviewing fees and charges be approved

PE 16/6 PLANNING REFORMS

Decision Notice D160006MEM

The report provided an update on the ongoing programme of Government Planning Reforms and summarised the proposals put forward since the last meeting of the Advisory Board.

In addition, endorsement was sought of a suggested response, attached as Annex 1 to the report, to a Department for Communities and Local Government consultation on proposed changes to national planning policy published in December.

Members noted that the consultation response deadline had been extended to 22 February 2016.

Reference was made to initial proposals for a pilot scheme to outsource planning applications to third parties. At the present time there was limited detail available.

The Housing and Planning Bill also introduced a new requirement on Local Planning Authorities to compile and keep up to date a Register of Brownfield land. Tonbridge and Malling Borough Council was one of 20 local authorities in the country invited to participate in a pilot scheme. It was suggested that the invitation be accepted subject to further information.

Members expressed concern about the reduced prospects of maintaining levels of provision of affordable rented housing as a result of the Government's current policy. It was reported that the Leader of the Council and the Cabinet Member for Housing and Environment Services would be writing to Tom Tugendhat MP and Tracey Crouch MP outlining these concerns.

It was also suggested that once the Housing and Planning Bill had been passed a joint briefing between the Planning and Transportation and Housing and Environmental Services Advisory Boards would be beneficial.

RECOMMENDED: That

- (1) the content of the report be noted; and
- (2) the response, attached as Annex 1 to the report, be endorsed as the Borough Council's response to the Department for Communities and Local Government consultation on proposed changes to national planning policy.

MATTERS SUBMITTED FOR INFORMATION

PE 16/7 LOCAL PLAN PROGRAMME AND PROGRESS

Members were provided with an update on the Local Plan progress including the assessments of the sites submitted as part of the Call for Sites exercise, the programme for preparing the Plan and Duty to Co-operate issues.

It was reported that work continued on the assessments and these were currently on schedule to be completed in the spring in accordance with the Local Plan programme. However, it was noted that there remained a number of factors beyond the Borough Council's control that might yet have an impact on the timetable. These included the contribution of key

infrastructure providers and statutory consultees to the assessment process and the ongoing Government planning reforms.

The Local Plan was being prepared in accordance with the Duty to Co-operate and the first formal request from a neighbouring authority in respect of unmet Gypsy and Traveller need from Maidstone Borough Council was received in December. A response had been sent advising that it was not possible, at the current time, to confirm whether there may or may not be any allocations for this type of development in the emerging Tonbridge and Malling Local Plan.

PE 16/8 TRANSPORTATION UPDATE

The report provided an update on various transportation matters, including current and future consultations for alleviating the impacts of Operation Stack and proposals for a new Lower Thames Crossing. It also provided a brief update on future airport capacity following the Airport's Commission recommendations.

Members noted progress in respect of planned or desired strategic highway improvements including Tonbridge High Street, A21 dualling, M20 Junction 4 and M25 Junction 5 east facing slips roads.

Members were advised that surveying along the A20 was due to commence in February 2016 as part of a study to assess the A20 corridor. This would form part of the evidence base for the Local Plan and the assessment of sites. An update on progress would be made at the next meeting of the Advisory Board.

With regard to Operation Stack and the proposals for lorry parking areas, Members asked that consideration be given to having measures in place in the Blue Bell Hill area to prevent overnight parking for large vehicles. It was also commented that the impacts of Operation Stack were wider reaching than reported and affected many routes into the Borough.

It was noted that the M25 Junction 5 study was underway and that officers would be monitoring progress.

MATTERS FOR CONSIDERATION IN PRIVATE

PE 16/9 EXCLUSION OF PRESS AND PUBLIC

There were no items considered in private.

The meeting ended at 10.35 pm

TONBRIDGE & MALLING BOROUGH COUNCIL

PLANNING and TRANSPORTATION ADVISORY BOARD

05 July 2016

Report of the Director of Planning, Housing and Environmental Health

Part 1- Public

Matters for Recommendation to Cabinet - Non-Key Decision

1 LOCAL PLAN – THE WAY FORWARD

This report updates Members on progress towards completing the Local Plan evidence base and sets out proposals and arrangements for the Local Plan Regulation 18 public consultations to commence in September, including emerging development strategies.

1.1 Introduction

- 1.1.1 Members will recall that preparation of the new Local Plan began soon after the publication of the National Planning Policy Framework in March 2012. The first stage of plan making is to build an evidence base. This has to be relevant, proportionate and up to date as it will be tested by an Independent Inspector towards the end of the process. This Board has received regular updates on progress, the most recent being to the January meeting, which focussed on explaining the technical assessments of the Call for Sites exercise.
- 1.1.2 This report provides a further update on progress, but importantly, also prepares for the next stage of Plan making involving public consultations into the main issues arising from the evidence and how to consider the best way forward in terms of a strategy to meet future needs for development and wider Plan objectives. This exercise is required by Regulation 18 of the Local Plan Regulations and is often referred to as 'Reg 18' or Issues and Options. It is proposed to adopt a plain English working title and avoid technical planning terms that may confuse members of the public, by referring to this document as 'The Local Plan – The Way Forward'.
- 1.1.3 Appended to this report is a draft document, which will form the focus of the consultation, expected to begin before the end of September and run for a minimum of 6 weeks. It will be refined in the intervening months and updated if necessary by evidence yet to be completed before seeking Cabinet approval on the 6th September. Also appended are two other supporting documents relating to Sustainability Appraisal and Habitats Regulations Assessment, which form part of the Local Plan process and also have to be the subject of public consultation. Members of the Board are invited to make the necessary recommendations to Cabinet at the end of this report.

1.2 Local Plan Evidence Update

1.2.1 Strategic Housing Market Assessment (SHMA)

- 1.2.2 Members will be aware that one of the key pieces of evidence for any Local Plan is to establish the Objectively Assessed Needs (OAN) for future development over the Plan period (in our case the Plan period is 2011-31). The Strategic Housing Market Assessment or SHMA sets out the OAN for future housing. The main SHMA report was completed in March 2014 and has been updated twice to take account of new sub-national population projections and household projections published by the Office of National Statistics (ONS) and the Department for Communities and Local Government (DCLG) respectively. The current OAN for new housing is 13,460 units over the Plan period or 673 per year.
- 1.2.3 The ONS published the latest edition of the sub national population projections in May. DCLG are expected to revise the household projections to reflect these later this year. Consequently, our consultants GL Hearn and Partners have been instructed to review the new data and advise if any revisions to the OAN are necessary. Early indications suggest that these will have a negligible impact on the OAN for Tonbridge and Malling. It is anticipated that the SHMA will be updated to reflect any changes by the time consultations are due to take place September.
- 1.2.4 The Gypsy and Traveller Accommodation Assessment (GTAA) carried out by the consultants Salford University and completed in April 2013 will have to be revisited in the light of legislative changes introduced by the Planning and Housing Act (2016) and amendments to the Planning Policy for Travellers Sites (August 2015).
- 1.2.5 Consequential amendments arising from the Housing and Planning Act mean that there is no longer a separate requirement for Local Authorities to prepare GTAAs. In future the needs of those people residing in or resorting to the district with respect to sites on which caravans can be stationed will in future, will have to be addressed as part of periodic reviews of all housing needs in accordance with Section 8 of the Housing Act 1985.
- 1.2.6 The changes to the definition of Traveller introduced in the amendment to the Planning Policy for Traveller Sites means that the current GTAA needs to be reviewed to reflect the new definition.
- 1.2.7 To date there has been no formal guidance from the DCLG on how Local Authorities should interpret the changes and examples of how Local Authorities are responding are limited and not fully tested. This part of the evidence base will have to be revisited using the best information available at the time.

1.2.8 Strategic Land Availability Assessment (SLAA)

1.2.9 The Strategic Land Availability Assessment responds to the needs identified in the SHMA and other parts of the evidence base, such as the Employment Land Review, by identifying sites that may have some potential for meeting those needs over the Plan period. Part one of the SLAA identifies existing commitments, such as developments that have already been completed since the base date in 2011, sites with planning permission, existing allocations for development and an estimate for windfall development from small sites (the SLAA only takes account of sites capable of delivering 5 dwellings or more).

1.2.10 Part two of the SLAA identifies sites that have some potential for delivery up to 2031 based on their suitability, availability and achievability (this was explained in more detail in the January Board report). National Planning Practice Guidance requires Local Planning Authorities to invite proposals from those with an interest in land early on in the process. This is known as the Call for Sites exercise.

1.2.11 The Call for Sites exercise ran from the spring of 2014 and closed on the 1st September 2015. Over 250 sites were submitted, including some suggestions from the Borough Council. These sites have now been assessed and on 27th May the results were uploaded to the Borough Council's website forming part of the Local Plan evidence base as an 'Interim Sites Assessment'. Those who submitted sites have been given an opportunity to inform the Council of any factual inaccuracies or changes, for example in respect of ownership, since the sites were first submitted. This means that some of the assessments may need to be amended.

1.2.12 The completed SLAA incorporating the most up to date monitoring information available for part one and the amended part two will be published by the time consultations begin in September.

1.2.13 Advisory notes and frequently asked questions have been made available alongside the Interim Assessments to clarify their status and recognise that in their current form these are a fairly crude tool in terms of the local policy constraints and potential yields that would be applied should any of these sites come forward in the Local Plan.

1.2.14 Currently, the residual need for additional housing taking into consideration the latest SHMA figures, less part one of the SLAA is approximately 6,000. The GTAA identifies a need for 21 new pitches, although as noted this is likely to change. The Employment Land Review identifies a need for additional employment land of up to 33 hectares over the Plan period.

1.2.15 Strategic Flood Risk Assessment (SFRA)

1.2.16 The Strategic Flood Risk Assessment is being prepared by consultants JBA and will be completed and published during the summer.

1.2.17 A20 Corridor Baseline Study

A study to establish the baseline data for the A20 between Ashton Way and Coldharbour Roundabout prepared was completed in May. The study prepared by Amey confirms the existing capacity issues, identifies a number of quick wins, but importantly, will form the basis for further modelling work to take place as part of the Local Plan.

1.3 **Next Steps**

- 1.3.1 Appended to this report is a document that will form the focus of the forthcoming public consultations anticipated to start this September. It takes the reader on a journey from the issues arising from the evidence, through the Plan making stages by first setting out the wider objectives (over and above simply meeting our identified needs), identifying the 'building blocks' that underpin any future strategy (for example, by prioritising brownfield land in sustainable locations) before proposing the guiding principles for a future strategy.
- 1.3.2 The consultation document sets out the issues that need to be addressed and the contribution the various building blocks and principles can deliver. It also points to the conclusion that to best meet future needs and deliver wider Plan objectives it will be necessary to draw on the key elements from each of these components in order to arrive at an optimal solution.
- 1.3.3 As an illustration of this and to guide the discussion, a way forward in the form of an emerging development strategy is set out in the document. This potentially could deliver significant infrastructure improvements in parts of the borough that have capacity issues and the negative impacts associated with that, meet needs where they arise through a portfolio of different sized sites to safeguard against under delivery, while making a proportionate and sustainable contribution to existing settlements to sustain communities and local businesses.
- 1.3.4 The emerging strategy could deliver in excess of our OAN for housing over the Plan period. This is intentional at this stage of Plan making as it provides for some flexibility for responding to comments relating to specific sites through consultation. It is also good planning practice in providing reassurances over delivery and maintain a five year supply as required by the Government. Finally it also provides some capacity for ongoing discussions relating to the Duty to Cooperate, which requires neighbouring Local Planning Authorities to demonstrate that they have planned positively to address cross boundary issues.
- 1.3.5 Questions are invited throughout the document to give some structure to the responses, although more general comments will also be carefully considered and taken into account.
- 1.3.6 Consultation arrangements will include tried and tested methods such as contacting those who have asked to be informed of Local Plan consultations, Parish Councils, local business representatives, neighbouring Local Authorities,

statutory consultees and other key stakeholders. We will be using the website and social media to inform and signpost and there will be hard copies at the usual deposit points and main receptions. Manned exhibitions and requests to attend public meetings will also be considered subject to resources and timing. These arrangements will be firmed up over the summer.

- 1.3.7 A Strategic Environmental Assessment and Sustainability Appraisal (SEA/SA) and a Habitats Regulations Assessment Screening Report will also be required to accompany the consultation document. These are also appended to this report and will form part of the consultation material for which approval is sought.

1.4 Legal Implications

- 1.4.1 Local Planning Authorities are required to prepare and keep up to date a development plan for their area. Failure to do so may leave the Council's planning decisions at risk of appeal and could also lead to intervention from Government.

1.5 Financial and Value for Money Considerations

- 1.5.1 There will be direct financial and value for money considerations associated with the public consultation exercise described in this report. These costs will be met from existing budgets. In addition and as noted above, failure to prepare a Local Plan within reasonable timescales may have financial implications if this results in appeals being lost.

1.6 Risk Assessment

- 1.6.1 Notwithstanding the risk associated with appeal as explained in sections 1.4 and 1.5 above, an out of date Local Plan puts at risk the ability of the Local Planning Authority to control development and plan positively for local communities.

1.7 Equality Impact Assessment

- 1.7.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

1.8 Recommendations

- 1.8.1 That the progress in respect of the preparation of the Local Plan evidence base and the proposed next steps including the Regulation 18 public consultations be noted; and
- 1.8.2 The documents appended to this report are recommended to Cabinet for approval as forming the basis of that consultation.

Background papers:

contacts: Ian Bailey
Planning Policy Manager

Nil

Louise Reid
Head of Planning

Steve Humphrey
Director of Planning, Housing and Environmental Health

Tonbridge & Malling Borough Council

Local Plan

‘The Way Forward’

Regulation 18
Issues and Options

September 2016

DRAFT



Foreword

We would like to thank you for taking part in this consultation on the new Local Plan for Tonbridge & Malling.

This consultation marks the first stage of plan-making. It is about identifying and sharing with you the issues the borough will face in the coming years and how we could, through positive planning policy, provide for the needs of our communities in a way that is responsible and sustainable.

There are many issues we need to consider including homes, jobs, community facilities and transport. We also need to recognise the importance of protecting valued natural and heritage assets and understand matters such as flood risk and biodiversity.

As this is the first stage of plan-making, this consultation focusses on strategic matters and we are keen to receive your views on the direction the Local Plan should take.

We hope that you take this opportunity to help us in preparing a new Local Plan for Tonbridge & Malling by responding to the questions posed in this document.



Cllr Nicolas Heslop
Leader of the Council



Cllr Howard Rogers
Cabinet Member for Strategic
Planning and Infrastructure

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Tonbridge & Malling Borough Local Plan

The Way Forward

Regulation 18 Consultation

September 2016

**An invitation to have your say in shaping the future of
where you live**

1. Introduction

1.1. What is the role of the Local Plan?

1.1.1. The Local Plan sets out a vision and a framework for the future sustainable growth of the borough, addressing needs and opportunities for housing, the economy, community facilities and infrastructure as well as safeguarding natural and heritage assets and securing good design.

1.2. Why is it important to be involved with the making of a new Plan?

1.2.1. Your involvement will help the Borough Council understand what matters to you and what the priorities are in terms of delivering sustainable growth.

1.2.2. This consultation is an opportunity to shape policies that, once adopted, will represent the starting point for decision-taking on development proposals for the next 10-15 years.

1.3. What is this consultation exercise aiming to achieve?

1.3.1. To have a clear direction the Plan needs to take account of local views in responding positively to meeting the needs of communities. It is important

that we encourage constructive thoughts and support about how we can plan in this way.

2. Context

2.1. Why is there a need to prepare a new Plan now?

2.1.1. The Borough Council's existing [Development Plan Documents](#) are now a little dated; there is a need to respond to the [National Planning Policy Framework](#) and importantly to reflect current local evidence including objectively assessed needs for homes, land availability, flooding and employment.

2.2. What are the expectations of the Government?

2.2.1. The Government's objectives are set out in the [National Planning Policy Framework \(NPPF\)](#). The NPPF places Local Plans at the heart of the planning system, so it is essential that they are in prepared and kept up-to-date. It makes it clear that local authorities should:

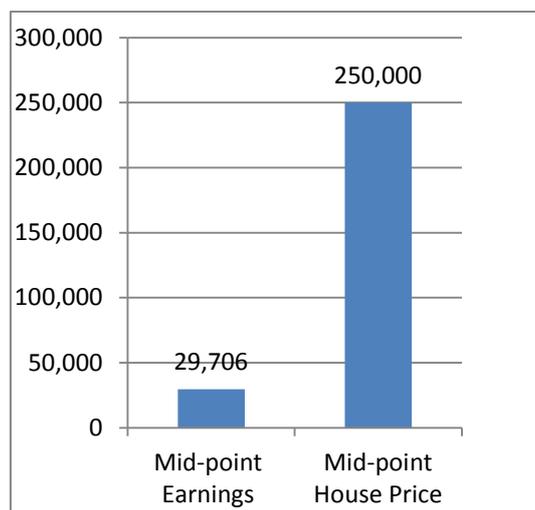
- positively seek opportunities to meet the development needs of their area (para.14)
- boost significantly the supply of housing (para.47)
- follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay (para.15)
- deliver a sound plan which is positively prepared in terms of seeking to meet objectively assessed needs; is justified by the evidence; is deliverable; and consistent with national policy, (para. 182)
- work with neighbouring authorities to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans (para.179).
- have regard to conserving biodiversity as part of policy and decision making. This is known as the Biodiversity Duty.

‘... We are committed to a planning system that provides communities with certainty on where new homes are built. Local Plans produced in consultation with the community are therefore the cornerstone of our planning reforms...’
(Brandon Lewis, Minister of State for Housing and Planning, Written Statement, July 2015).

2.3. Why is the Government keen to meet needs and boost significantly the supply of housing?

2.3.1. The supply of housing across the country, particularly in the South-East, is not keeping up with need. This mismatch has meant that affordability has become an acute problem.

Figure 1: Earnings compared with house prices in Tonbridge & Malling (2014)



Source: Strategic Housing Market Assessment (Figures 26 & 31) (June 2015)

2.3.2. In Tonbridge & Malling, mid-point house prices (overall) are over 8 times greater than mid-point earnings.

2.3.3. This means that there are many households in Tonbridge & Malling that are, at present, unable to access the open housing market and unable to become homeowners. Boosting supply in an appropriate way will help address this.

‘...I will not stand by and allow this generation, many of whom have been fortunate enough to own their own home, to say to the next generation: we’re pulling up the property ladder behind us. So we will build the houses Britain needs so that more families can have the economic security that comes with home ownership....’
(George Osborne, Chancellor of the Exchequer, Mansion House Speech, June 2014)

2.4. What are the risks of not preparing a new Plan or preparing a new Plan that does not respond to the Government’s objectives?

2.4.1. There are three significant risks:

- Uncertainty – The absence of a plan means that there would be no confidence over where development may or may not happen over the next 10-15 years.
- Planning by Appeal – The absence of a plan means that decisions on proposals will increasingly be made at Appeal rather than through local decision making
- Government intervention - If the Borough Council does not move forward with plan-making, there is the risk that the Government will intervene arrange for a local plan to be prepared for the borough.

2.4.2. All of these risks have one thing in common; reduced local influence over what happens in the borough.

2.5. What are the benefits of preparing a new Plan that responds to the Government’s objectives?

2.5.1. A sound plan, shaped by local people, provides certainty, and therefore confidence, in many ways:

- Clarity over where sustainable growth should take place.
- Certainty over the level of growth needed to deliver improvements in infrastructure to benefit existing and new communities.

- Clarity over which important natural and heritage assets can be protected from development.
- Ensuring that the basis for decision-making on proposals is clear and has been shaped by local evidence and local communities through on-going engagement.

3. Plan-making process

3.1. How will the new Local Plan be prepared?

3.1.1. The starting point in the process is the gathering of evidence. The Council has collated, and continues to update, evidence covering matters including housing, jobs, flooding, as set out below. This has been shaped by the expectations of the Government. This evidence is explained in more detail in Section 4.

- Strategic Housing Market Assessment
- Strategic Land Availability Assessment
- Housing Land Supply Position
- Economic Futures Forecasting
- Employment Land Review
- A20 Corridor Study
- Gypsy and Traveller Accommodation Assessment
- Strategic Flood Risk Assessment (Level 1)
- Kent Habitats Survey
- Green Belt Study
- Plan Viability

3.1.2. This consultation is the next stage and introduces the issues the new Plan will need to tackle, together with the potential responses available to positively respond to them.

3.1.3. The Borough Council will carefully consider responses received during the initial consultation. This will inform the next stage in the plan-making process.

3.1.4. The full timetable can be found here: www.tmbc.gov.uk/localplan

3.2. How will the Plan be assessed?

- 3.2.1. The environmental, economic and social credentials of the options and policies will be subject to a **Sustainability Appraisal (SA)**. The Sustainability Appraisal plays an important role in demonstrating that the Local Plan reflects sustainability objectives and has considered all reasonable alternatives. It incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive.
- 3.2.2. The Local Plan will also be subject to a Habitats Regulations Assessment (HRA) undertaken in accordance with the Habitats Directive.
- 3.2.3. Both the Sustainability Appraisal, incorporating the requirements of the Strategic Environmental Assessment, and the Habitats Regulations Assessment will be published alongside this document for consultation.

4. Local Plan issues and objectives

4.1. How were the issues identified?

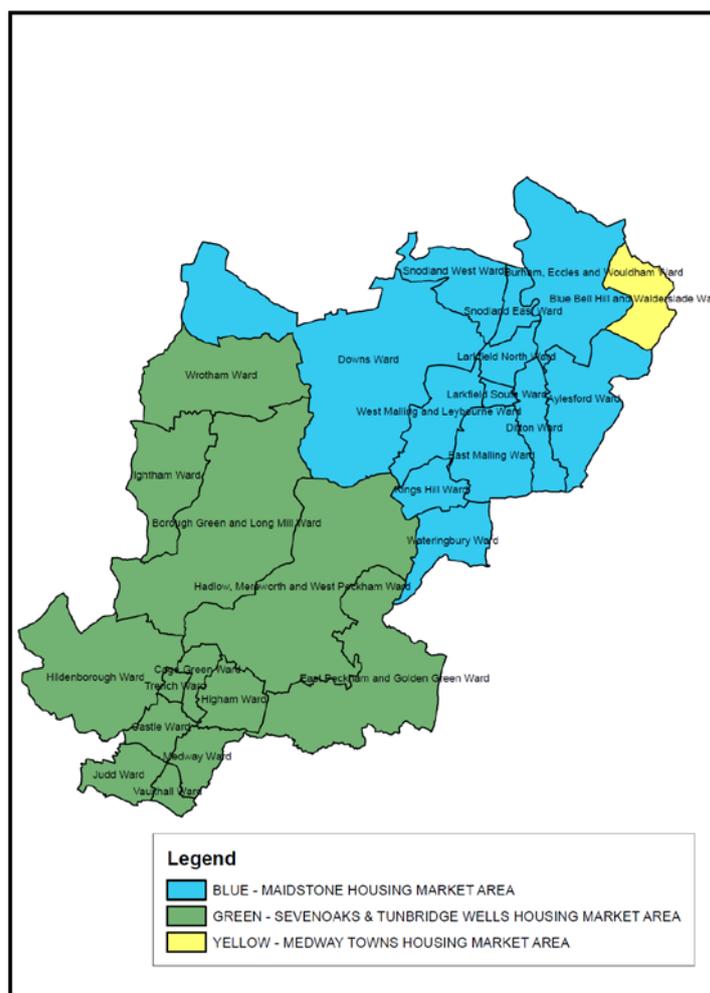
- 4.1.1. The Government's policy is very clear that '*...every effort should be made objectively to identify and then meet the housing, business and other development needs of an area...*' (NPPF, para.17, core principle 3). In response to this requirement the Council undertook evidence gathering for various issues including housing, employment and environmental matters. Set out below are the headlines from each piece of work. Further details, including the evidence itself, are available from the Local Plan web page: www.tmbc.gov.uk/localplan.

4.2. What broad issues does the existing evidence identify?

Housing

- 4.2.1. The Strategic Housing Market Assessment (SHMA) is a piece of evidence that provides an understanding of housing market dynamics, an assessment of future housing needs for both market and affordable housing and the housing requirements of different groups within the population. The Strategic Housing Market Assessment concluded that there are, broadly speaking, two Housing Market Areas (HMAs) exerting an influence across the borough:
- Maidstone/Tonbridge & Malling
 - Sevenoaks/Tunbridge Wells/Tonbridge and Malling
- 4.2.2. A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. To determine the geographical extent of HMAs, data including house prices, migration flows and contextual data including travel to work areas is analysed.
- 4.2.3. Figure 2 illustrates the extent of the influence of each of these HMAs across the borough. An appreciation of this pattern of HMAs is important for understanding how we can meet needs where they are generated and achieve sustainable patterns of development.

Figure 2: Influence of different Housing Market Areas on Tonbridge & Malling Borough



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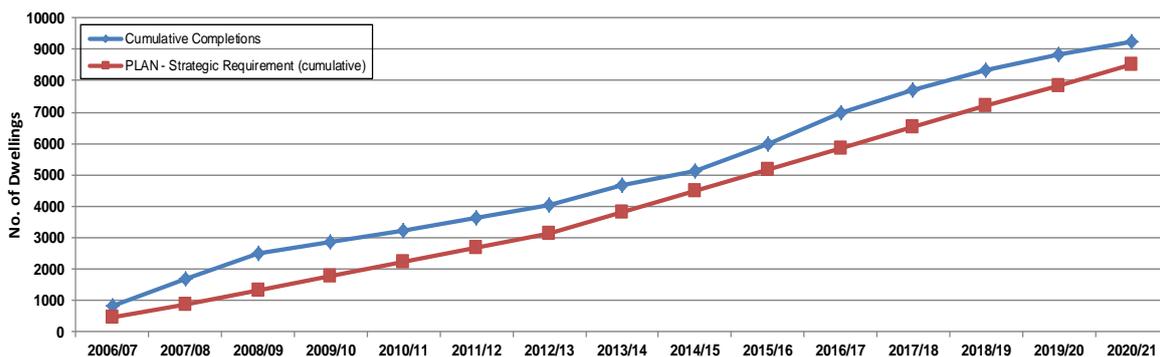
4.2.4. The Strategic Housing Market Assessment (SHMA) has identified a gross Objectively Assessed Need (OAN) of 673 homes per annum for the period 2011-2031. This is a demographic-based projection that has been subject to local sensitivity testing as required by the Government’s Planning Practice Guidance.

4.2.5. The figure of 673 homes per annum is the gross need for the borough; completions and outstanding commitments since the base date (2011) need to be subtracted, to work out the net need that the new Local Plan needs to address. As a result of positive planning by the Borough Council a significant

amount of homes have been built since 2011¹ (1,933 units) and there are many units in the pipeline that already have planning permission (4,721 units). In addition there are 83 units from unimplemented allocations in the existing Development Plan. Taking account of a modest windfall projection from small sites (i.e. sites with a capacity of less than five units); this translates to a net need that the Plan must respond to of 6,000 units (375 units per annum, 2016-2031).

- 4.2.6. In addition the SHMA identified an affordable housing need of 277 homes per annum and a registered care need (C2 use class) of 20 bed spaces per annum for the plan period (2011-2031).
- 4.2.7. Local evidence has concluded that there is a net need of 21 pitches (2012-2028) for Gypsy and Traveller accommodation. Analysis of data has shown a need for 2 plots for Travelling Showpeople over the assessment period.
- 4.2.8. **Historic Housing Land Supply:** Since the base date of the adopted Development Plan (2006/07), cumulative housing completions have consistently exceeded the cumulative requirements as illustrated in Figure 3 (below) (source: Annual Monitoring Report 2015, Figure A3). This demonstrates that the Borough Council has a sound record of delivery, according to the criteria set out in the Government's [Planning Practice Guidance](#).

Figure 3: Housing Trajectory



- 4.2.9. This is a result of the Borough Council positively planning for significant opportunities that have arisen in the past including Peter’s Village, Kings Hill, Leybourne Chase and Holborough Lakes. The expectations of the Government are that this positive planning approach needs to continue. However, due to a long history of making the most of brownfield land to meet

¹ Up until 31st March 2015, as evidenced in the [Annual Monitoring Report](#) (December 2015)

needs, the opportunities for positively responding to assessed needs on brownfield land are becoming few and far between. This presents challenges for the new Local Plan, not least the need to consider development on fresh land in sustainable locations.

4.2.10. Projected Five-Year Housing Supply: The latest published position on the local housing land supply is set out in the [Annual Monitoring Report 2015](#). As a result of positive local planning the Borough Council can demonstrate 5.3 years' worth of land supply as measured against the Objectively Assessed Need from the SHMA of 673 units per annum (+ 5% - see Table 1 below). This means that the relevant policies in the Borough Council's adopted Development Plan on supply are still current and not out-of-date, according to the requirements of [para.49](#) in the NPPF. But that is no reason for complacency. Rather it is a demonstration that forward looking planning provides the best way of managing the future of development in the borough.

Table 1: Housing Land Supply Position

Housing Land Supply 2006-2021 (673 units per year)																	
Year	Sites with Permission (1)	Small Sites Estimate	Large Sites Windfalls	Allocations (3)	Kings Hill Phase 3	Kings Hill (4)	Holborough Quarry (5)	Leybourne Grange	Peters Pit	Tonbridge Central Area completions and permissions	Completions (2)	5 Year Totals (2)	Total Supply 2006-2021 (2)	5 Year Supply 2015/16-2019/20 (2)			
2006/07	437					281	85			47	850	3210	9302	3760			
2007/08	349					300	137			53	839						
2008/09	280					224	91			203	798						
2009/10	209					93	47	16		7	372						
2010/11	145					55	18	59		74	351						
2011/12	119					90	100	22		113	444	2775			9302	3760	
2012/13	151					84	59	70		30	394						
2013/14	257					108	12	82		149	608						
2014/15	267					91	43	26		60	487						
2015/16	387					90	80	100		185	842						
2016/17	428			5	50	73	80	108	70	198	1012	3317	9302	3760			
2017/18	242			25	100	14	80	109	150	30	750						
2018/19	138			33	100	1	80	69	150	77	648						
2019/20	85			20	100		80	69	150	4	508						
2020/21	69				100		80		150		399						
2021/22	6				100		46		150		302						
2022/23					85		6		150		241						
2023/24									30		30	573					
2024/25											0						
2025/26											0						
Not Phased	89									23	112	112					
Totals	3658	0	0	83	635	1504	1124	730	1000	1253	9875						
													SHMA 5 yr OAN +5% (8)	3533			
													Difference	227			
													5-Year Supply (7)	106%			
													No. of years of HLS (8)	5.3			

- Note (1) Excluding Strategic Sites & Tonbridge Town Centre
- Note (2) Excluding windfalls but including allocations
- Note (3) Includes 65 dwellings on allocated land at Kings Hill
- Note (4) Excludes 65 dwellings on allocated land without permission
- Note (5) Holborough Quarry 2008/09 error - should have been 91 units not 182 units
- Note (6) Objectively Assessed Need (OAN) for housing identified in the Strategic Housing Market Assessment (SHMA) (Overview, June 2015) plus 5% buffer as required by para. 47 in the NPPF
- Note (7) Supply of ready to develop housing sites as a % of the 5-year OAN requirement (see footnote (6))
- Note (8) Number of years of Housing Land Supply (HLS) measured against 5-year OAN requirement + 5% (see footnote (6))

	Next 5 years of projected housing supply
	5-year supply as a percentage of the OAN requirement (see footnote (6))
	Post Plan Period (2006-2021)
	Number of years of housing land supply measured against 5-year SHMA requirement (see footnote (6))

Employment

- 4.2.11. The Employment Land Review concluded that there is just enough supply, in quantitative terms, to meet office needs but there is a shortfall of industrial space of up to 33 ha. It is for the Local Plan to consider positive strategies for addressing this for the benefit of local people.
- 4.2.12. The Employment Land Review also concluded that given that much of the Borough is rural in nature, it is important that planning policy supports sustainable rural based employment development and responds positively to proposals that encourage the reuse of redundant agricultural buildings to meet future industrial and office based needs. The current roll-out of fibre broadband across Kent (which will extend coverage to significant parts of Tonbridge & Malling’s rural areas) will help to overcome the key infrastructure and accessibility barriers typically faced by rural businesses and provide the opportunity for the Borough’s rural locations to play a greater economic role in future.

Strategic Flood Risk

- 4.2.13. The Level 1 Strategic Flood Risk Assessment (SFRA) (2016) recommends a risk-based and sequential approach to development and flood risk, so that development is located in low flood risk areas where possible; it is recommended that this approach is adopted for future developments within the borough. The SFRA recommends that development must seek opportunities to reduce overall levels of flood risk at sites, for example by: reducing volume and rate of surface water runoff; locating development to areas with lower flood risk; creating space for flooding; and/or integrating green infrastructure into mitigation measures for surface water runoff from potential development.

Green Belt

- 4.2.14. An assessment of the robustness of the existing boundaries of the Green Belt, as measured against the purposes identified in the Government’s [NPPE](#), is currently work-in-progress. The objective is to ensure that, at the end of this exercise, the boundaries are robust and can endure at least for the duration of the plan period (up to 2031).

Kent Habitats

4.2.15. The [Kent Habitats Survey](#) (2012) identifies that Tonbridge & Malling District extends over four Natural Character Areas (NCAs), which contribute to the wide variety of habitats found within the area. This includes a range of UK Biodiversity Action Plan (BAP) Priority Habitats, some of which contribute significantly to Kent's overall resource.

Infrastructure

4.2.16. As part of the assessment of the Call for Sites submissions, key infrastructure providers were engaged with to help with the assessment of suitability and the likely requirements for supporting infrastructure such as schools, healthcare and highways. The need to assess potential options for the new Local Plan and the effect of planning designations on the potential yield, it is not possible, at this stage, to understand the exact land-take for the supporting infrastructure. However, it is important that we positively plan for a level of sustainable growth that can facilitate significant improvement to infrastructure for the benefit of existing and new communities and the local economy.

4.2.17. A study to establish the baseline data for the A20 between Ashton Way and the Coldharbour roundabout prepared was completed in May 2016. The study clarifies and confirms existing capacity issues along the corridor and identifies some minor improvements to junctions and traffic management measures. It also prepares the way for further modelling work for more significant improvements that could be delivered through the Local Plan.

Strategic Land Availability Assessment (SLAA)

4.2.18. This piece of evidence identifies those sites that were brought forward as part of the 'Call for Sites' exercise as being potentially suitable and deliverable for development.

4.2.19. This assessment was a technical exercise in accordance with National Guidance, primarily to clarify practical aspects of the sites, rather than to judge whether or not they should feature as future allocations for development in the Local Plan. This means that the assessment did not take account of local policy considerations, including the extent of Green Belt boundaries, which are matters for consideration during the making of the Local Plan itself.

4.2.20. Based upon an average yield of 30 dwellings per hectare, the SLAA concluded that those sites assessed as suitable and deliverable have an overall capacity of approximately 26,000 homes. The outcome of this calculation is by no means a final figure of what is acceptable in planning terms; if and when the sites are progressed through to this plan-making stage a more detailed assessment will be required, see later in this report. At that stage planning judgements about how much, if any, of a site is appropriate for development will need to be made which might well reduce the area and yield significantly. Again, at that stage it will be necessary to understand fully the land-take for supporting uses including schools, healthcare facilities, playing fields, amenity space and roads. Potential yield at this stage is therefore very much a starting point for this exercise.

Viability

4.2.21. Whole plan viability will need to be assessed. The assessment needs to demonstrate that the sites and scale of development are viable, taking into account the need for infrastructure provision. In addition, it is important to understand the consequences of pursuing a wide range of standards in the Local Plan on the delivery of development. This is required by Government policy (see para.173 in the [NPPF](#)). The opportunity to undertake this assessment is when we have a clear development strategy and detailed policies.

4.3. What key issues has the evidence identified?

4.3.1. The evidence highlighted above has identified the following key issues:

- Objectively Assessed Need (OAN) for housing of 673 units per annum (2011-2031)
- Affordable housing need of 277 units per annum (2011-2031)
- Registered care need (C2 use class) of 20 bed spaces per annum (2011-2031)
- Good long-term record of housing delivery
- 5.3 years' worth of housing land supply, see Table 1
- Shortfall of up to 33 ha of industrial space
- A range of UK Biodiversity Action Plan (BAP) Priority Habitats, some of which contribute significantly to Kent's overall resource.
- A significant number of potential sites providing choice for future development.

4.4. What the Local Plan cannot address

- 4.4.1. In addition to considering what the Plan needs to cover, it is equally important to understand what the Plan cannot include. The Government's [Planning Practice Guidance](#) makes it very clear what Local Plans should exclude:

'...In drafting policies the local planning authority should avoid undue repetition, for example by using generic policies to set out principles that may be common to different types of development...' (Paragraph: 010 Reference ID: 12-010-20140306)

'...There should be no need to reiterate policies that are already set out in the National Planning Policy Framework...' (Paragraph: 010 Reference ID: 12-010-20140306)

- 4.4.2. Where it is not supported by evidence to add anything locally-distinctive to the national policy objective(s), the Local Plan will sign-post the reader to the relevant policy in the NPPF or current Government policy at the time the plan is published. Examples of such National policies include those relating to **natural and historic assets**, for example: **Conservation Areas, Listed Buildings, and Sites of Special Scientific Interest**. In addition, the purposes and policy objectives of the **Green Belt** will not be replicated, although the existing boundaries will be assessed as part of the plan-making process as expected by the Government in the NPPF.

4.5. Which key objectives does the Plan need to address?

- 4.5.1. The local evidence, Government policy and initiatives promoting the most of brownfield land and transport hubs, point to the following set of objectives that the Local Plan should aim to achieve:

Plan Objective 1: Respond positively to locally assessed need for homes and jobs

Plan Objective 2: Support and sustain local communities across the borough, big and small, by planning to meet needs where they are generated.

Plan Objective 3: Protect high value, important natural and heritage assets

Plan Objective 4: Deliver sustainable growth to support the urban and rural economies and make the best use of infrastructure

Q1. Do you agree with this set of objectives for the new Local Plan, Yes/No?

Please explain.

5. Local Plan – Strategy considerations

5.1. Introduction

5.1.1. The previous sections have identified the key national policies, issues and objectives that the Local Plan needs to respond to. This section outlines the potential way forward to address these matters.

5.2. What are the building blocks for the Local Plan strategy?

5.2.1. National planning policy has identified a number of key requirements that should underpin strategies in Local Plans. We have interpreted these as three building blocks (see list below) that should form the foundation of any strategy considered for this Local Plan.

Building Blocks:

- A. Addressing assessed needs on brownfield land within the built-up confines of settlements
- B. Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity
- C. Addressing needs on land at low risk of flooding within existing settlements

Q2. Do you agree with this set of building blocks for the Local Plan strategy, Yes/No?

Please explain.

5.3. How can the building block opportunities be assessed?

5.3.1. Information about the assessment process is set out in appendices B, C and D.

5.3.2. This assessment asked key questions including:

- Does this make a positive contribution to addressing assessed needs?
- Which plan objectives does this respond to?
- Would this achieve a sustainable pattern of development?

5.4. How is the potential contribution of each building block assessed?

5.4.1. The starting point is the assessments of the [Call for Sites](#) submissions. However, this was a technical assessment that took account of high-level constraints beyond the control of the Borough Council but which preclude development, for example, Special Areas of Conservation, and areas at high risk of flooding.

5.4.2. Now that we are at the plan-making stage, consideration needs to be given to designations which will have some bearing on what could be realistically achieved. These include: Air Quality Management Areas; Conservation Areas; Listed Buildings; Historic Parks & Gardens, Areas of Outstanding Natural Beauty; Grade 1 Agricultural Land; Local Wildlife Sites and Priority Habitat Areas.

5.4.3. In assessing the development potential of sites, these designations are discounted from the developable area. In some cases this results in suitable and deliverable sites being eliminated altogether.

5.4.4. In respect of the Green Belt, the Government's National Planning Policy Framework is very clear that the preparation of the Local Plan is the time to review the boundaries of the Green Belt ([para.83](#)). With this in mind, land that currently falls within the Green Belt is not discounted, in the first instance, from the developable area but instead the risks posed to the Green Belt are highlighted.

5.4.5. The outcome of this process is an area (hectares) which is then multiplied by 30 (average density of housing units per hectare) to understand the development potential.

<p>Please Note: This development potential should be treated with caution because it is inevitable that there will be land-take for necessary supporting infrastructure, for example roads and amenity space. For the larger sites, the land-take for supporting infrastructure is likely to be more significant because of the need for facilities including education, healthcare and local centres. In assessing the sites, key</p>
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infrastructure providers were engaged with and issues were identified. However, due to the preliminary stage of plan-making it has not been possible to confidently predict what is essential for each site. This is something that will be revisited and worked-up in more detail once we have a clearer direction for the new Local Plan.

5.5. How do the building blocks perform in the assessment?

- 5.5.1. It is evident from the assessments that, individually, the building blocks would not effectively address assessed needs and deliver sustainable patterns of development.
- 5.5.2. To focus development on sites within existing settlements would support a sustainable pattern of development because of the proximity and connectivity to local services and employment opportunities. However, the limited number of sites would not produce enough potential to form a sound approach to housing affordability and labour supply to support the local economy. It is also evident from the assessments that, individually, the building blocks would not adequately address the draft Plan Objectives.

5.6. What is the cumulative potential of the building blocks?

- 5.6.1. The next step involves an assessment of the cumulative contribution that these three building blocks could potentially make.
- 5.6.2. According to this assessment, the combination of all three building blocks would also not address the full set of Plan Objectives.

Table 2: Cumulative contribution of the building blocks

Building Block	Description	Potential Yield
A	Addressing assessed needs on brownfield land within the built-up confines of settlements	217
B	Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity	1,840
C	Addressing needs on land at low risk of flooding within existing settlements	226
Total Potential Yield		2,066*

*excluding double-counting where there is overlap between the building blocks

5.6.3. Although the potential development arising from the application of these building blocks alone would fall significantly short of the identified need for development, they are sound components that should form the foundation of whatever strategy ultimately underpins the new Local Plan.

5.7. Which principles should guide the development strategy for the new Local Plan?

5.7.1. The outcome of the assessment of the building blocks means that in order to effectively respond to Government policy, local evidence and the draft plan objectives, we need to consider opportunities beyond existing settlement confines.

5.7.2. To help guide decision-making on which opportunities should be considered and assessed in more detail a set of principles have been prepared. These have been directed by National policy, the local evidence base and the draft plan objectives.

5.7.3. The guiding principles are:

- 1. Addressing assessed needs adjacent to the principal urban areas of the Medway Gap and Tonbridge, in each housing market area**
- 2. Addressing assessed needs adjacent to a range of settlements across the borough to help support and sustain local communities, big and small**
- 3. Addressing assessed needs in reasonable proximity to transport hubs, utilising and building upon existing infrastructure**
- 4. Addressing assessed needs through development focussed in the least constrained parts of the borough**
- 5. Providing a mixed portfolio of sites, big and small, to meet a range of needs throughout the duration of the plan period up to 2031, over the short-term (up to 5 years), medium-term (6-10 years) and over the long-term (11-15 years)**
- 6. Delivering a sustainable level of growth to facilitate significant improvements to supporting infrastructure, eg schools, highways and**

healthcare, for the benefit of existing and new communities

7. Focussing on the contribution that larger potential sites could deliver in a proportionate way to meet wider plan objectives and ensure delivery in the plan period.

Please Note: These principles should not be read in isolation.

Q3. Do you agree with this set of guiding principles, Yes/No?

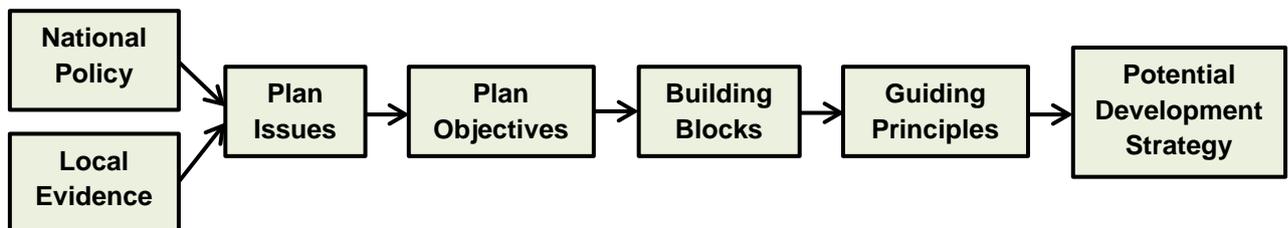
Please explain.

5.8. What do we need to consider when applying the guiding principles to the formulation of a development strategy for the Local Plan?

What is the desired outcome?

5.8.1. The desired outcome is a strategy that positively addresses assessed needs in a realistic, responsible and sustainable way. We want to achieve a future for the borough where people have a desire and ability to live locally because of the quality of life. This means that we need to consider a policy response to the evidence that can sustainably meet the plan objectives in a way that is shaped by the guiding principles. To help appreciate this process the following flow-chart has been prepared.

Figure 4: Local Plan Development Strategy: Decision-making flow-chart



How important is the size and mix of sites?

5.8.2. In determining what would make a sustainable and deliverable strategy for the new Local Plan it is important to consider the mix as well as the location

of potential development sites. A strategy dominated by small to mid-sized sites may not generate the critical mass required for significant improvements to infrastructure (schools, highways and healthcare) which could benefit existing as well as new communities. A strategy dominated by a few strategic sites would bring in to question whether the short to medium-term housing needs of the borough would be adequately addressed because larger sites, by their nature, often take longer to start delivering homes.

What could be realistically achieved?

5.8.3. In addition, it is important to consider the magnitude of development. The Local Plan needs to be realistic in terms of what the market can deliver. Historically, the local market has delivered just over 600 homes per year². In considering the magnitude of development, the Local Plan needs to strike the balance between positively addressing current assessed needs with the need to make sure opportunities remain to meet the longer-term needs of the borough beyond 2031. It is important to bear in mind that this plan has a time horizon of 2031 and that in preparing it we must have an eye on how we can possibly meet longer-term development needs stretching well beyond the plan period. This is an expectation of the Government. If we are to effectively respond to this expectation it would be unwise to exhaust all of our genuine opportunities in the short-medium term; that would not be good husbandry.

What could happen if we allocated all the potential development sites?

5.8.4. With these considerations in mind, it is evident that the unfettered allocation of all of the potentially suitable and deliverable sites (as evidenced in the Strategic Land Availability Assessment) beyond but adjacent to the confines of existing settlements would result in an unsustainable and unrealistic development strategy. The sheer quantum of development would put significant pressure on infrastructure and pose a serious risk to air quality, local amenity, natural and heritage assets and biodiversity and the local economy. Furthermore, in light of what the local market has previously delivered, it is questionable whether all the sites would be realistically deliverable in the plan period.

² 615 units per annum average (2001/2 to 2011/12), para. 4.109, Strategic Housing Market Assessment (March 2014)

5.9. How can we find a proportionate policy response?

- 5.9.1. To help focus on what could represent a proportionate policy response, the Borough Council has devised a set of sustainability buffers. These are areas beyond but immediately adjacent to the settlement confines. These buffers extend beyond the confines by 500 metres for urban areas and 250 metres for all other settlements. These are considered to be reasonable sustainable distances from the outer extents (a maximum of 10 mins walking distance) which would help avoid the coalescence of settlements, thereby protecting the integrity and separate identity of urban areas and villages. We appreciate that this is important to local communities.
- 5.9.2. These buffers have only been devised as a guide for focussing on a potential way forward; they are not prescriptive. In some cases, the potential developable area identified for each opportunity site is not necessarily the full extent of the land within the buffer that is free from constraint and local designations. Issues including topography, landscape, existing operations (on-site and neighbouring) and access have been considered which has had the effect of reducing the extent of the potential developable area.
- 5.9.3. The application of the buffers to the urban areas, rural service centres and rural settlements has resulted in a number of opportunities across the borough for consideration. In determining which opportunities should feature in the Local Plan strategy, it is important to revisit the objectives and understand what the Plan is trying to achieve.

Does the Local Plan strategy need to include all of those suitable and deliverable sites that feature within the sustainability buffers?

- 5.9.4. As highlighted above, these buffers have been devised to help focus the mind on which opportunities could be considered as part of the Local Plan development strategy; they are not prescriptive.
- 5.9.5. It is important to bear in mind the wider plan objectives, building blocks and the guiding principles when determining what could be a potential sustainable development strategy for the new Local Plan. This may mean that certain sites assessed in the Strategic Land Availability Assessment as not being suitable and deliverable could be considered if it is evident that they would make a significant positive contribution to the strategy and where the issues identified are not insurmountable.

5.10. What could a sustainable development strategy for the new Local Plan look like?

5.10.1. With the plan objectives, building blocks, guiding principles and the Government's expectations in mind, the strategy illustrated in Appendix E could represent a sound direction for the new Local Plan to take. This could, potentially, deliver in the region of 10,000 homes so it builds in some flexibility and choices, although this estimate would need to be subject to more detailed assessment.

What contribution could this strategy make to the plan objectives?

5.10.2. A potential development strategy of this type could make a positive contribution to each and every Plan Objective by supporting growth across the borough in communities (big and small) in each of the Housing Market Areas, thereby enabling a sustainable pattern of development with good connectivity to local services and employment opportunities (locally and further afield).

How does this potential strategy relate to the building blocks?

5.10.3. The foundation of the strategy are the **three building blocks** of: (A) making the most of brownfield land in existing settlements; (B) utilising areas safeguarded in the existing Development Plan for future development; and (C) avoiding land at high risk of flooding within built-up areas.

Would this potential strategy represent a proportionate policy response?

5.10.4. This foundation is built-upon by the realistic and sustainable opportunities presented by the guiding principles (the reasonable alternatives), making sure a **proportionate policy response** is achieved in light of the assessed needs, infrastructure capacity, local natural and heritage assets and biodiversity, and the need to consider long-term development needs beyond the plan-period (i.e. good husbandry).

Would this potential strategy deliver a mixed portfolio of development sites?

5.10.5. These opportunities would enable the supply of a mixed portfolio of sites that should enable the delivery of homes over the period of the Plan (short, medium and long-term, as sourced from the Strategic Land Availability Assessment) for the benefit of urban and rural communities. The inclusion of strategic sized development areas will facilitate, in the medium to long-term, significant improvements in infrastructure provision which will be of benefit

not just to those people moving into the new homes but the wider local community.

How does this potential strategy perform against the Sustainability Appraisal objectives?

5.10.6. **Summary of Interim Assessment:** Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land and delivering the quantum of development necessary to meet our identified need, this option does require the use of some greenfield land. The dispersed pattern of development at a range of settlements across the borough provides support for both the urban and rural economies and attempts to address the needs of a range of communities, including significant support for the town centre. A distribution of sites across both HMAs supports a sustainable pattern of development. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.

What to do next

5.10.7. We would like your views on this potential approach to a development strategy for the new Local Plan. When considering your response, please bear in mind the evidence base, the Government's expectations, the plan objectives and the guiding principles.

Q4. Do you agree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take, Yes/No?

Please explain.

6. Local Plan – Other key strategic considerations

6.1. How should the new Local Plan respond to the economic evidence?

6.1.1. The Employment Land Review concluded that there is just enough supply, in quantitative terms, to meet office needs but there is a shortfall of industrial space of up 33 ha, depending on the scenario for future growth.

6.1.2. National planning policy in respect of employment land has evolved significantly since the existing Development Plan was prepared. The expectation of the Government is that a more flexible approach to economic development needs to be deployed by local planning authorities in order support its growth. The NPPF, at [para. 22](#), states:

'...Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities....'

6.1.3. It is important to bear in mind the degree to which the Local Plan can actually influence current and future patterns of economic development. For example, offices can now be converted to residential properties under permitted development rights.

6.1.4. In light of these changes and policy expectations, we need to consider how we can effectively respond to the economic evidence in a way that is compliant with national policies and regulations and nurtures (and does not hinder) economic growth.

Q5. Should the new Local Plan continue to support and focus new economic development at and around existing economic hubs such as the Tonbridge Industrial Estate, New Hythe Lane, Kings Hill, Hermitage Lane and Quarry Wood or should an alternative strategy be considered?

Please explain.

Q6. Should the Council be more flexible and consider a wide range of employment generating uses within existing economic hubs in the borough, Yes/No?

Please explain.

Q7. Should the Local Plan be supportive of more mixed-use developments, including start-up units within residential schemes, Yes/No?

Please explain.

6.2. What should be the future role of Tonbridge Town Centre?

- 6.2.1. Tonbridge is the principal town in the Borough.
- 6.2.2. Tonbridge Town Centre has undergone a significant transformation over the past 10 years. A key part of this has been steered by the Borough Council's [Tonbridge Central Area Action Plan](#) which has seen more people living in the heart of the town. Improvements to the High Street have been undertaken this year to help improve the environment for shoppers, workers and visitors alike.
- 6.2.3. At the same time, rapid transformation has occurred in shopping habits which has had a consequential impact on retail markets and the types of activity that we see in the town centre today.
- 6.2.4. As a result, the character of Tonbridge has evolved, with a significant number of people now living close to the centre.
- 6.2.5. With these changes in mind, and with a view that the rate of change for some of the influences on Tonbridge, eg retail market, has proven to be quicker than the cycle of Local Plan making itself, we need to carefully consider what the best policy response is for the Town moving forward. We must consider how we can effectively balance the need to protect Tonbridge's identity with the need to allow it to effectively respond to changing markets and the opportunities they present to allow it to thrive and be a vital place.

Q8. What should be the role of Tonbridge Town Centre moving forward, i.e. should it be a retail hub, a social and cultural hub or a combination of the two?

Please explain.

**Q9. Should the Local Plan include a flexible policy framework for Tonbridge to allow the Town to be able to respond to future market opportunities to enable the Centre and adjoining areas to thrive
Yes/No?**

Please explain.

Q10. Do you have other thoughts about how planning policy should guide development in and around the town centre?

6.3. What should the Green Belt boundaries be in the Local Plan?

6.3.1. As part of the evidence gathering for the new Local Plan, the robustness of the existing Green Belt boundaries was assessed. The boundaries were assessed against the five purposes of the Green Belt as identified in the [Government's NPPF](#):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.3.2. The Government's National Planning Policy Framework is very clear that the preparation of the Local Plan is the time to review the boundaries of the Green Belt ([para.83](#)). Furthermore, the NPPF makes it very clear ([para.84](#)) that in....

'...reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development...'

6.3.3. It further states:

‘... They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary...’.

- 6.3.4. With this in mind and taking account of the Housing Market Areas exerting an influence over the borough, it is evident that if the new Local Plan is to effectively promote sustainable patterns of development and positively address assessed needs to support and sustain communities across the borough, some land will inevitably need to be taken out of the Green Belt.
- 6.3.5. This is a difficult decision to take but it would, ultimately, be positive action that could help improve housing affordability and help mitigate wider negative impacts on the environment, amenity and the local economy of sustainable growth. It is important that the Green Belt boundaries that feature in the new plan are strategically defensible and can endure for at least the lifetime of the plan.
- 6.3.6. Having said this, the preparation of the new Local Plan presents an opportunity to consider whether certain boundaries need to be re-aligned so that the Green Belt performs a more effective function (as measured against the five purposes outlined in the Government’s NPPF – see above). This could have the consequence of increasing the amount of land within the Green Belt in certain locations which, overall, could ensure the quantum of land within the Green Belt across the borough is not significantly eroded.
- 6.3.7. Figure 5 (overleaf) suggests a proposed strategic extension to the Green Belt in the vicinity of West Malling and Kings Hill.
- 6.3.8. It is considered that this would be a more reliable and defensible boundary that would contribute positively to purposes of the Green Belt.
- 6.3.9. This would result in approximately 134 ha being put into the Green Belt.

Q11. Do you agree that the Local Plan should put land into the Green Belt east of West Malling, Yes/No?

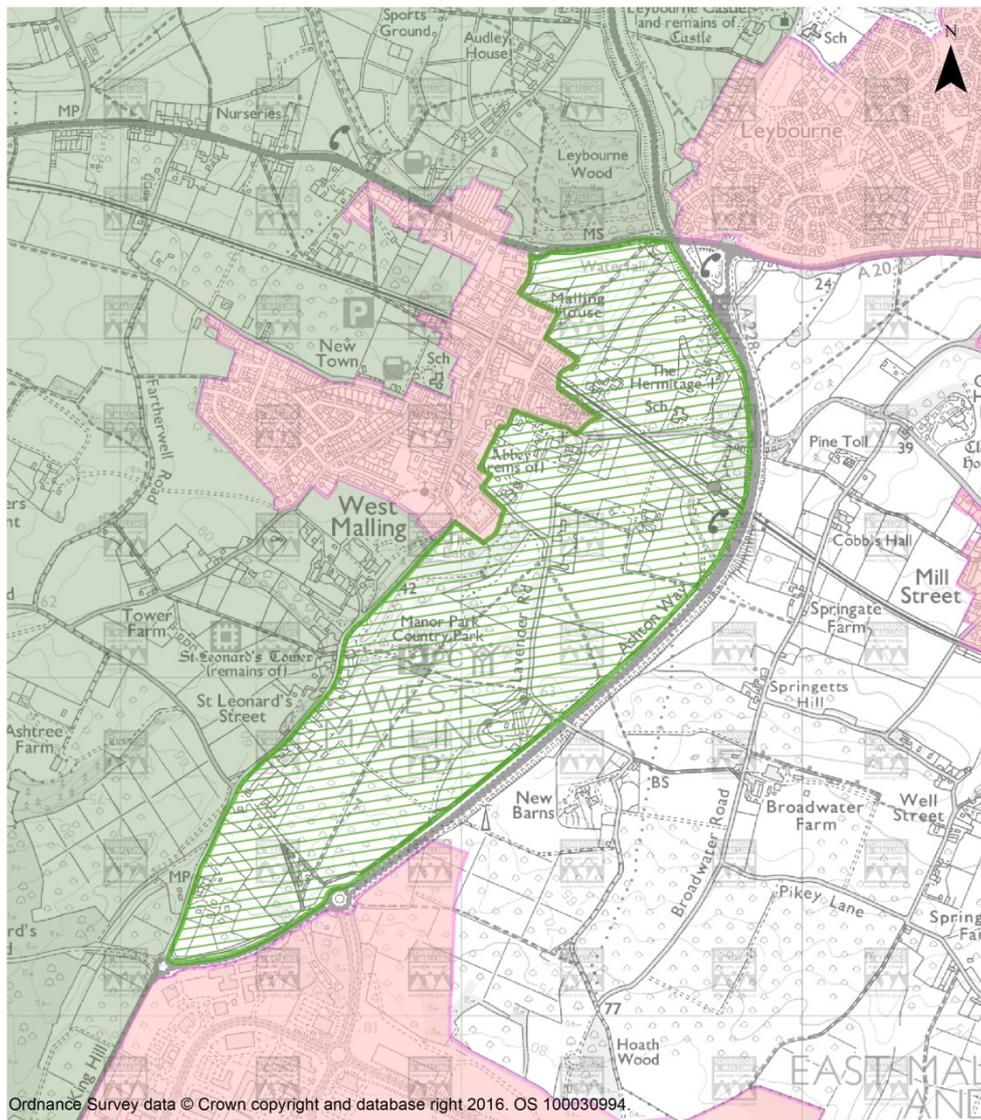
Please explain.

Q12. Are there any other parcels of land in the borough that you think could be justifiably (as measured against the five purposes)

put in the Green Belt without putting at risk the requirement for the Local Plan to positively address assessed needs?

Please explain.

Figure 5: Proposed extension of the Green Belt in the vicinity of West Malling and Kings Hill



Legend

-  Potential addition to Green Belt
-  Existing Green Belt extent
-  Confines of built up areas

7. Local Plan – Managing development

7.1. In delivering sustainable growth, what issues are important to you?

- 7.1.1. It is important that when development takes place, it does so in a way that will achieve a quality living experience for the benefit of local communities. However, in pursuing this objective the Borough Council needs to be mindful of the need for the sites allocated for development in the new Local Plan to be viable and therefore deliverable. This message is made very clear in the Government’s National Planning Policy Framework ([paras. 173 and 174](#)) which states:

‘...the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened...’.

‘...In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk...’.

- 7.1.2. With this in mind, the Borough Council needs to understand which local standards are important to you. It is unlikely that all of the following potential standards could be pursued fully, if at all, because of viability. The extent to which the Borough Council can pursue any or a combination of the following local standards will be informed by evidence but will ultimately be determined by viability assessments. It should be noted that a significant outcome of the Government’s [Housing Standards Review](#) was the withdrawal of the Code for Sustainable Homes and the integration of the requirements in respect of the environmental performance of new buildings (carbon emissions) within the Building Regulations.

Q13. In delivering development, which local standards are important to you? Please can you rank the following potential standards in order of importance, giving 1 for the most important down to 7 for the least important:

- Affordable housing
- Publicly accessible open space
- Car parking
- Housing densities
- Internal space standards
- Accessibility standards
- Water efficiency standards

7.2. How should the Local Plan respond to the optional National Standards?

- 7.2.1. One of the outcomes of the Government’s [Housing Standards Review](#) was the establishment of additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. The Government’s [Planning Practice Guidance](#) makes it very clear that the time to consider exceeding and/or pursuing the optional space standard is at the plan-making stage and that these should only be justified through local evidence and viability testing.
- 7.2.2. The Government’s [Technical housing standards – nationally described space standard](#). The minimum gross internal space standards in the technical housing standards are set out in Table 3.
- 7.2.3. Further information on the access and water efficiency standards in the Building Regulations is available from the [Planning Portal](#).

Table 3 - Minimum gross internal floor areas and storage (m²)

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) ²			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

Q14. Do you think the Borough Council should assess the viability of including the nationally described space standards in the new Local Plan, Yes/No?

Please explain.

7.2.4. In considering which standards you think should be set in the Local Plan, please be mindful of the cumulative impact of these standards and the risks this could pose to the implementation of the plan as a whole. With this in mind:

Q15. Do you think the Borough Council should assess the viability of exceeding the minimum standards required by Building Regulations in respect of access and water, Yes / No?

Please explain.

8. Local Plan – Participation

8.1. How can you participate in this consultation?

8.1.1. There are many ways that you can take part in this consultation:

- **Online** – The consultation document and an interactive form is available from the Council’s website: www.tmbc.gov.uk/localplan
- **E-mail** – You can download the consultation form and complete it offline and e-mail it to: localplan@tmbc.gov.uk
- **In-writing** – You can submit your responses to the questions to the following postal address:
 - Ian Bailey, Planning Policy Manager, Tonbridge & Malling Borough Council, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ

8.1.2. The document is also available to view at the Council’s offices at Kings Hill and Tonbridge Castle. In addition public exhibitions will be held at the following locations:

- **XXXXXX**, date, time
- **YYYYYY**, date time

8.1.3. As a reminder, the full set of consultation questions are listed on the following pages.

8.1.4. The deadline for comments is **xx xxxxxxxx 2016**.

Summary of Consultation Questions

Q1. Do you agree with this set of objectives for the new Local Plan, Yes/No? (p.17)

Please explain.

Q2. Do you agree with this set of building blocks for the Local Plan strategy, Yes/No? (p.19)

Please explain.

Q3. Do you agree with this set of guiding principles, Yes/No? (p.23)

Please explain.

Q4. Do you agree that this potential approach to a development strategy could provide a sound direction for the new Local Plan to take, Yes/No? (p.27)

Please explain.

Q5. Should the new Local Plan continue to support and focus new economic development at and around existing economic hubs such as the Tonbridge Industrial Estate, New Hythe Lane, Kings Hill, Hermitage Lane and Quarry Wood or should an alternative strategy be considered? (p.29)

Please explain.

Q6. Should the Council be more flexible and consider a wide range of employment generating uses within existing economic hubs in the borough, Yes/No? (p.30)

Please explain.

Q7. Should the Local Plan be supportive of more mixed-use developments, including start-up units within residential schemes, Yes/No? (p.30)

Please explain.

Q8. What should be the role of Tonbridge Town Centre moving forward, i.e. should it be a retail hub, a social and cultural hub or a combination of the two? (p.31)

Please explain.

Q9. Should the Local Plan include a flexible policy framework for Tonbridge to allow the Town to be able to respond to future market opportunities to enable the Centre and adjoining areas to thrive Yes/No? (p.31)

Please explain.

Q10. Do you have other thoughts about how planning policy should guide development in and around the town centre? (p.31)

Q11. Do you agree that the Local Plan should put land into the Green Belt east of West Malling, Yes/No? (p.32)

Please explain.

Q12. Are there any other parcels of land in the borough that you think could be justifiably (as measured against the five purposes) put in the Green Belt without putting at risk the requirement for the Local Plan to positively address assessed needs? (p.32)

Please explain.

Q13. In delivering development, which local standards are important to you? Please can you rank the following potential standards in order of importance, giving 1 for the most important down to 7 for the least important (p.35):

- Affordable housing
- Publicly accessible open space
- Car parking
- Housing densities
- Internal space standards
- Accessibility standards
- Water efficiency standards

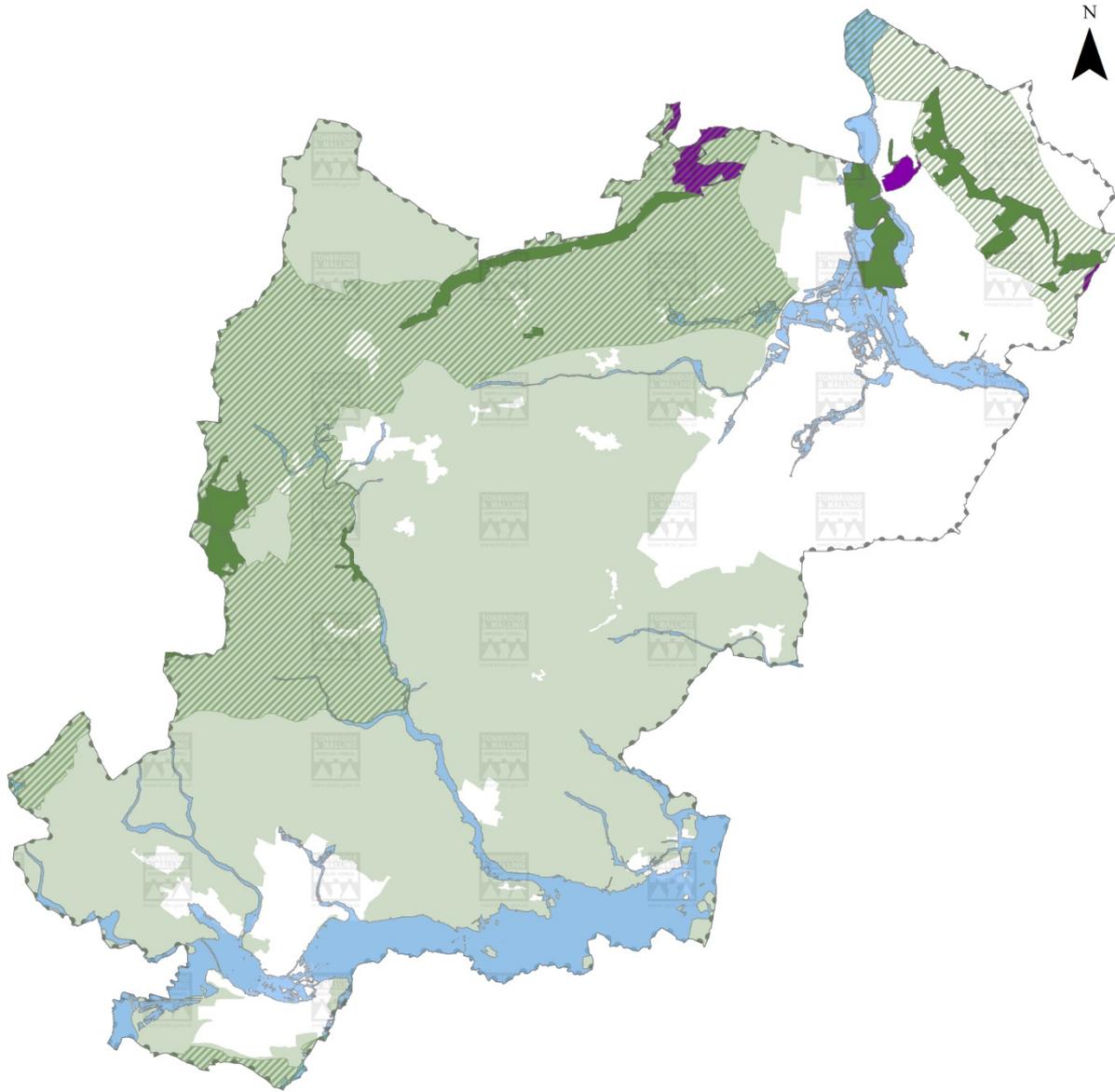
Q14. Do you think the Borough Council should assess the viability of including the nationally described space standards in the new Local Plan, Yes/No? (p.37)

Please explain.

Q15. Do you think the Borough Council should assess the viability of exceeding the minimum standards required by Building Regulations in respect of access and water, Yes/No? (see p.37)

Please explain.

Appendix A: Key Constraints



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Legend

-  AONB
-  SAC
-  SSSI
-  Flood Zone 3
-  Green Belt

Appendix B: Building Blocks Assessment Pro-forma

Building Block Title	
Description	A brief description of the building block, outlining what it means.
Spatial Representation	A visual representation of the building block and how it relates to settlement confines and housing market areas and high-level constraints
Does this make a positive contribution to addressing assessed needs?	A high-level assessment of whether this option could deliver, across the time frame of the plan period (up to 2031) a quantum of development that could positively address assessed needs, in particular the Objectively assessed Need for housing. This assessment would take account of high level constraints ³ and designations ⁴ .
Which Plan Objectives does this respond to?	A list of Plan objectives that this building block would make a contribution to.
Would this achieve a sustainable pattern of development?	An assessment of whether the resultant quantity, deliverability and geographical spread of sites would amount to a sustainable pattern of development. The objective of the Government is for Local Plan strategies to promote sustainable patterns of development, particularly when reviewing Green Belt boundaries (see para. 84 in the NPPE). In answering the question ' <i>Will this strategy achieve a sustainable pattern of development?</i> ' factors including housing market areas and economic generating opportunities, as well as important natural and heritage assets, are taken into account.
What are the risks of pursuing this alone?	An initial assessment of the consequences of pursuing this building block alone without considering alternative/additional opportunities.

³ High-level constraints that preclude development are: Special Areas of Conservation (SAC); Sites of Special Scientific Interest (SSSI); Flood Zone 3 (for more vulnerable uses, eg residential); Ancient Monuments; Ancient Woodlands; and areas, parks and woodlands covered by Tree Preservation Orders

⁴ Air Quality Management Areas; Conservation Areas; Listed Buildings; Historic Parks & Gardens, Areas of Outstanding Natural Beauty; Green Belt; and Local Wildlife Sites

Appendix C: Building Blocks (A, B and C) Pro-formas

Building Block A	Addressing assessed needs on brownfield land within the built-up confines of settlements
Description	This building block focusses on the opportunities of responding to assessed needs on previously-developed land within the built-up confines of existing settlements ⁵ . This is, essentially, land which is or was occupied by development, including the curtilage of the developed land. It excludes land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time. The Figure below illustrates the extent of the settlement confines and the distribution of those sites assessed as suitable and deliverable for development, as well as the relationship with the Housing Market Areas.
Does this make a positive contribution to addressing assessed needs?	No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites over the short, medium and long-term of the plan period (up to 2031) to positively address the net Objectively Assessed Need. It would only generate a potential yield of 217 units, all of which are small. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Objectives 3
Would this achieve a sustainable pattern of development?	No. Whilst this building block would make the best use of existing previously-developed land within the built-up confines of the settlements across the borough in both housing market areas, it would, in reality, deliver very few new homes. Opportunities to support and sustain a range of communities across the borough would be limited.
What are the risks of pursuing this alone?	A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to

⁵ built-up confines of urban areas, rural service centres and rural settlements as defined in the Council's existing Development Plan. These are illustrated on the [Proposals Map](#)

Building Block A	Addressing assessed needs on brownfield land within the built-up confines of settlements
	buy/rent).

Building Block B	Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity
Description	This building block focusses on the opportunities of responding to assessed needs on land safeguarded in the Council’s existing Development Plan to meet longer-term development needs beyond the existing plan period (up to 2021). This includes sites identified in Policy CP4 in the Core Strategy as well as the Bushey Wood Area of Opportunity (Policy CP16 in the Core Strategy). The Figure overleaf illustrates the distribution of the safeguarded sites and the relationship with the two broad Housing Market Areas.
Does this make a positive contribution to addressing assessed needs?	No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites, particularly over the short-term of the plan period, to positively address the net Objectively Assessed Need. It would only generate a potential yield of 1,840 units, with the majority of potential on a single site (Bushey Wood Area of Opportunity). A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Partially Objectives 1, 2 and 3
Would this achieve a sustainable pattern of development?	No. Whilst this building block would make use of previously identified opportunities at locations in each Housing Market Area, it would not deliver a mixed portfolio of sites and would not deliver a sufficient number of new homes. Opportunities to support and sustain a range of communities across the borough would be limited.
What are the risks of pursuing this alone?	A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to buy/rent). Furthermore there is the risk that there would be an adequate supply of new homes in the short to medium term of the Local Plan.

Building Block C	Addressing needs on land at low risk of flooding within existing settlements
Description	This building block focusses on the opportunities of responding to assessed needs on suitable and deliverable sites in areas at low risk of flooding (Flood Zone 1) within existing settlements. The Government's Planning Practice Guidance is very clear that the Sequential Test should be applied in the preparation of a Local Plan, hence the assessment of this strategy option. The Sequential Test essentially involves, in the first instance, the assessment of whether or not sustainable development can be achieved through new development located entirely within areas with a low probability of flooding (Flood Zone 1). For the purposes of this assessment, 'sustainable development' is defined as development close to services and centres, i.e. within the built-up confines of existing settlements ⁶ The Figure overleaf illustrates the extent of Flood Zone 1 and the distribution of those sites assessed as suitable and deliverable for development, as well as the relationship with the Housing Market Areas.
Does this make a positive contribution to addressing assessed needs?	No. This building block, alone, would not generate a mixed portfolio of suitable and deliverable sites, to positively address the net Objectively Assessed Need. It would only generate a potential yield of 226 units. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Partially Objective 3.
Would this achieve a sustainable pattern of development?	No. Whilst this building block would make use of opportunities at locations in each Housing Market Area, it would not deliver a mixed portfolio of sites and would not deliver a sufficient number of new homes. Opportunities to support and sustain a range of communities across the borough would be limited.
What are the risks of pursuing this alone?	A significant risk of pursuing this building block, alone, is that affordability is likely to worsen, resulting in more and more local people being unable to access housing in the borough (to buy/rent).

⁶ built-up confines of urban areas, rural service centres and rural settlements as defined in the Council's existing Development Plan. These are illustrated on the [Proposals Map](#)

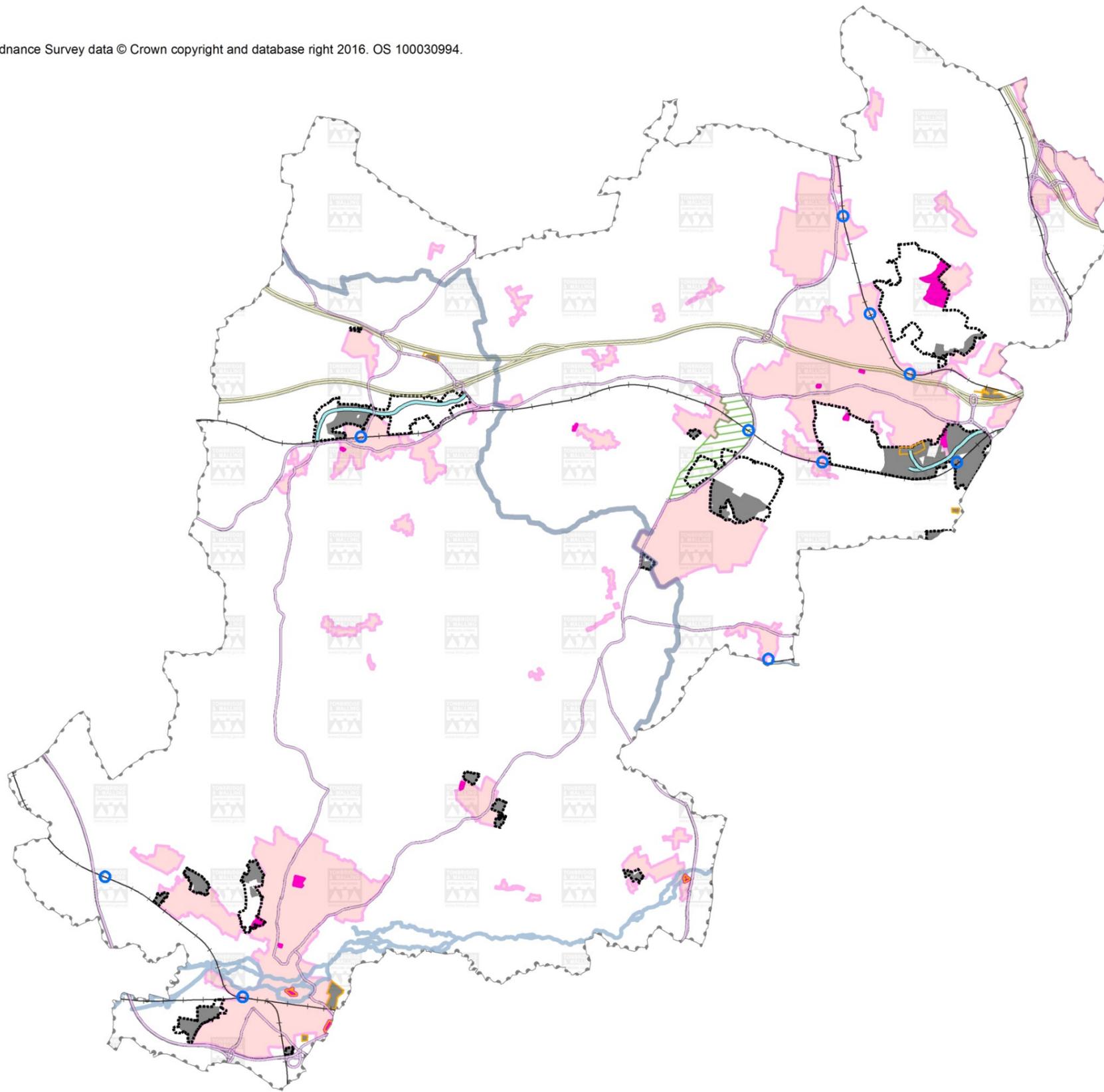
Appendix D: Combined Building Blocks (A, B and C) Map and Pro-forma assessment

Building Blocks A, B and C	Combination of all 3 (Addressing assessed needs on brownfield land within the built-up confines of settlements, addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity and addressing needs on land at low risk of flooding within existing settlements)
Description	See above and the pro forma for each building block
Does this make a positive contribution to addressing assessed needs?	No, it would not make a very positive contribution. Cumulatively the building blocks would generate a potential yield of 2,066 units (excluding double-counting where there is an overlap between the building blocks). It is questionable whether the portfolio is sufficiently mixed to meet the short, medium and long-term assessed needs. A basic assessment discounting high level constraints and designations means that there is limited potential from this source.
Which Plan Objectives does this respond to?	Partially Objectives 1 and 2. Objective 3.
Sustainability Appraisal (Interim Assessment)	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land, and supporting local economies, the quantum of development will be insufficient to meet identified need. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, a large strategic site may have a long lead in time which means that it is more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.
Would this achieve a sustainable pattern of development?	To a degree, yes. The combination of the building blocks would generate opportunities at locations in each Housing Market Area. However, it is highly questionable whether this distribution is adequately balanced across the two HMAs with a significant amount of potential focussed in the Maidstone & Tonbridge & Malling area (north-east part of the borough). Opportunities to support and sustain a range of communities across the borough would be limited. Furthermore, the majority of the potential is on a couple of large sites which means that there would be a limited range of opportunities to address needs throughout the plan period (short, medium and long-term).

<p>Building Blocks A, B and C</p>	<p>Combination of all 3 (Addressing assessed needs on brownfield land within the built-up confines of settlements, addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity and addressing needs on land at low risk of flooding within existing settlements)</p>
<p>What are the risks of pursuing a combination of these building blocks?</p>	<p>A risk of pursuing a combination of these building blocks is that the assessed needs may not be fully addressed which could have negative consequences on affordability, although not as severe if only one building block underpinned the new Local Plan. There is also the risk that the imbalance of suitable and deliverable sites across the two HMAs could result in unsustainable patterns of development emerging with the generation of new, long trips by the car between people living in one HMA (Maidstone and Tonbridge & Malling) and commuting to places of work in the other HMA (Sevenoaks, Tunbridge Wells and Tonbridge & Malling). This could have negative impacts on the environment (air) and, at times, on the economy (traffic delays). In addition the long-term sustainability of some local communities is at risk because they would not benefit from the opportunities presented by this approach. Furthermore, there is the risk that the needs throughout the plan-period are inadequately addressed as a result of a limited mix of sites.</p>

Appendix E: Potential Development Strategy

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Legend

-  Housing Market Area
-  Train stations
-  A Roads
-  Motorways
-  Potential new road
-  Railway lines
-  Site outlines
-  Potential employment/other site outlines
-  Building Blocks
-  Potential developable areas
-  Potential addition to Green Belt
-  River Medway
-  Confines of built up areas

Tonbridge and Malling Borough Council

Local Plan

Interim Sustainability Appraisal Report

September 2016



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1. NON-TECHNICAL SUMMARY

- 1.1.1 This non-technical summary is an overview of the assessment work carried out and explains how Sustainability Appraisal (SA) ties in with the emerging Tonbridge and Malling Local Plan.
- 1.1.2 The purpose of SA is to promote sustainable development through the integration of social, environmental and economic considerations into the plan making process. It is a legal requirement to carry out SA, as well as a Strategic Environmental Assessment (SEA). Both of these requirements are covered by this report.
- 1.1.3 The existing Local Development Framework shapes the development of the borough until 2021. However since adoption, the Government has introduced the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG). Consequently the Council has commenced work on a new Local Plan and the SA will be used to assess the social, environmental and economic effects of the emerging strategies and policies.
- 1.1.4 The SA/SEA process is iterative and has taken place alongside the emerging Local Plan. There are 5 stages to preparing SA. These are:
- Stage A: Setting the context and objectives, establishing a baseline and deciding on the scope;
 - Stage B: Developing and refining options and assessing effects;
 - Stage C: Prepare the Sustainability Report;
 - Stage D: Consult on the draft SA Report and Local Plan
 - Stage E: Adoption and Monitoring.
- 1.1.5 The Scoping Report is available to view on the Council's [web site](#) and contains details of how Stage A was undertaken. This Interim SA Report relates to Stage B.
- 1.1.6 In general, the Building Blocks and options perform well in sustainability terms. Some are likely to have more positive impacts over a greater range of issues than others, and conversely, in some instances there may be potential negative impacts. The commentary in this report highlights where this is the case and suggests remedial measures to try to reduce these effects where appropriate.
- 1.1.7 The SA process is an iterative piece of work, and only one step in the process of developing a preferred development strategy.
- 1.1.8 This report will be published for consultation between ?? and ??.

2. SUSTAINABILITY APPRAISAL

2.1. Introduction

- 2.1.1 The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of planning policy documents.
- 2.1.2 It is a legal requirement for local authorities to carry out SA. In addition local authorities are also required to undertake a Strategic Environmental Assessment (SEA). SA and SEA are required by separate legislation, however, as there are many cross-overs between the two processes, they are usually undertaken together. The Government's approach is to incorporate the requirements of the SEA Directive into a wider SA process¹. To this end the Government has published guidance² on undertaking SA of Local Plans that incorporates the requirements of the SEA Directive. The combined SEA / SA process is referred to in this document as Sustainability Appraisal (SA).
- 2.1.3 This report provides an overview of the Sustainability Appraisal (SA) assessment work carried out to date, and explains how SA ties in with the emerging Tonbridge and Malling Local Plan.

2.2. Local Plan

- 2.2.1 A Local Plan guides the future development of the Borough and provides the local planning policy framework within which this will be delivered. The adopted Tonbridge and Malling Local Development Framework (LDF)³ covers the period to 2021. There is a need to review the current LDF documents to take into account changes to government legislation, policy and guidance since their adoption. The current suite of LDF documents will remain in place until a new Local Plan is adopted.
- 2.2.2 The emerging Tonbridge and Malling Local Plan is a document which will contain the strategic policies, site allocations and development management policies which will influence development in the Borough until 2031. The SA will be used to assess the potential impacts of these emerging options and subsequent policies.

¹ Environmental Assessment of Plans and Programmes Regulations http://www.legislation.gov.uk/ukxi/2004/1633/pdfs/ukxi_20041633_en.pdf

² Contained within the National Planning Practice Guidance website (<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/>) and A Practical Guide to the Strategic Environmental Assessment Directive, ODPM September 2005

³ Comprising Core Strategy, Development Land Allocations, Tonbridge Central Area Action Plan and The Managing Development and the Environment Development Plan Documents

2.3. Strategic Environmental Assessment (SEA)

2.3.1 Strategic Environmental Assessment (SEA) is required by EU Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (often referred to as the SEA Directive). Plans and programmes with the potential to have significant environmental effects (positive or negative) are required to undergo SEA. All Local Plans are considered to have the potential for significant environmental effects. Table 1 below sets out the requirements of the SEA Regulations and how these have been met by the SA process.

Table 1: Requirements of the SEA Regulations

Environmental Report requirements ⁴	Section of this report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	Scoping 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
(c) the environmental characteristics of areas likely to be significantly affected;	Scoping 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
(e) the environmental protection objectives, established at international, Community or Member State 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
(f) the likely significant effects ⁵ 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 3 and Appendix 1
(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 3 and Appendix 1
(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 and Appendix 1
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 3.3
(j) a non-technical summary of the information provided under the above headings.	Section 1

⁴ As listed in Annex I of the SEA Directive (Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment).

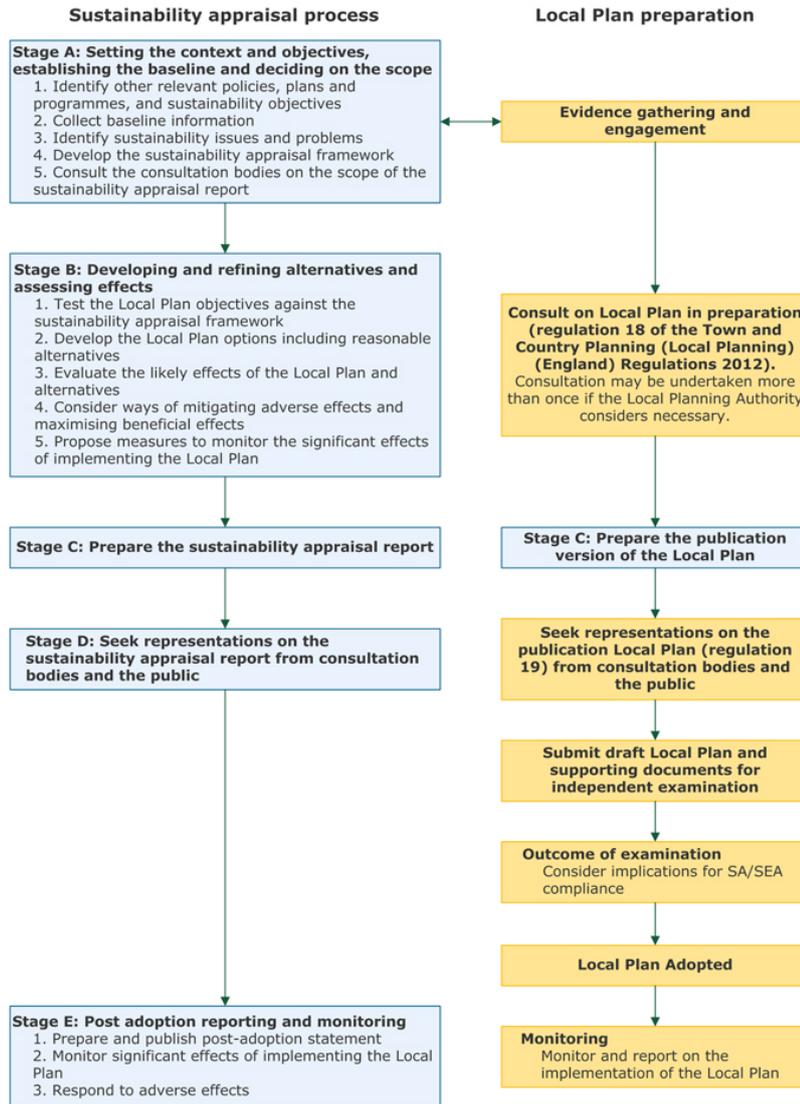
⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

2.4. Sustainability Appraisal

2.4.1 Sustainability Appraisal (SA) is required in the UK by the Planning and Compulsory Purchase Act 2004.

2.4.2 Figure 1 set out the key stages of the SA process and the corresponding stage in the production of a Local Plan.

Figure 1



2.4.3 The Scoping Report, containing all of the Stage A tasks, was published in February 2015 and consultation was carried out with the statutory consultees (Natural England, the Environment Agency and Historic England).

Interim Sustainability Appraisal Report

2.4.4 This Interim SA Report has been written to accompany the Tonbridge and Malling Local Plan – Regulation 18 Report and corresponds to Stage B of the SA process above. It has:

- Tested the objectives against the SA framework;
- Assisted in the development of Local Plan approaches and assessed their likely effects;
- Considered how to maximise beneficial effects and minimise negative impacts of different approaches; and
- Discussed monitoring arrangements.

2.5. Interim Sustainability Appraisal Report

2.5.1 In this SA Report the objectives and potential options for addressing the local issues set in the Tonbridge and Malling Local Plan – Regulation 18 document are assessed against the SA framework.

2.5.2 Table 2 sets out the Tonbridge and Malling SA framework of 12 objectives and accompanying decision making criteria, and links them to the SEA Directive topics.

Table 2: SA Framework

SA Objective	Decision making criteria	SEA Directive topics
1. To ensure that everyone has the opportunity to live in an affordable home	<p>Will it deliver affordable housing?</p> <p>Will it deliver sufficient supply to meet the identified housing need?</p> <p>Will it provide housing for the aging population?</p> <p>Will it provide for the accommodation needs of Gypsies and Travellers and Travelling Showpeople?</p>	<p>Population</p> <p>Human health</p>
2. To reduce and manage the risk of flooding	<p>Will it reduce the number of people and properties at risk of flooding?</p> <p>Will it manage water efficiently and sustainably?</p>	Water
3. To improve the health and care of the population	<p>Will it promote healthy lifestyles?</p> <p>Will it improve access to healthcare?</p> <p>Will it increase and quantity and quality of publically accessible open space?</p>	<p>Population</p> <p>Human health</p>
4. To reduce crime		Population

and the fear of crime		
5. To improve accessibility for everyone to services and facilities	<p>Will it provide increased travel choice?</p> <p>Will it support the continued viability of urban and rural centres?</p>	<p>Population</p> <p>Human health</p>
6. To improve efficiency of land use	<p>Will it use land that has been previously developed?</p> <p>Will it avoid the sterilisation of economic mineral reserves?</p> <p>Does it result in the loss of best and most versatile agricultural land?</p>	<p>Biodiversity</p> <p>Soil</p> <p>Material assets</p>
7. To protect and improve air quality	<p>Will it avoid locating development in areas of existing poor air quality?</p> <p>Will it help avoid the creation of additional AQMAs?</p>	<p>Human health</p> <p>Air</p>
8. To ensure that the Borough responds positively, and adapts to, the impacts of climate change	<p>Will it support the use of renewable resources?</p> <p>Will it promote energy efficiency?</p>	<p>Climatic factors</p>
9. To protect and enhance natural and heritage assets	<p>Will it minimise habitat fragmentation?</p> <p>Will it provide increased access to, and understanding of the historic environment?</p> <p>Will it conserve and enhance designated landscapes?</p>	<p>Biodiversity</p> <p>Fauna</p> <p>Flora</p> <p>Cultural heritage</p> <p>Landscapes</p>
10. To reduce waste and achieve sustainable waste management	<p>Will it reduce waste generation?</p> <p>Will encourage the re-use of materials?</p>	<p>Material assets</p>
11. To maintain and improve water quality and to use water more efficiently	<p>Will it avoid a deterioration of the quality of waterways and groundwater?</p> <p>Will it facilitate water re-use and recycling?</p>	<p>Water</p>
12. To achieve and maintain a vibrant economy	<p>Will it encourage the rural economy and diversification?</p> <p>Will it contribute to providing a range of employment opportunities in accessible locations?</p> <p>Will it support town centre vitality?</p>	<p>Population</p>

Interim Sustainability Appraisal Report

2.5.3 Using the SA Framework and associated questions, baseline information and professional judgement, the likely effects and impacts of the development options are considered. Significant effects are highlighted and opportunities identified to improve the overall sustainability of the approaches. The scoring system used to assess the impacts is identified in Table 3.

Table 3: Scoring Mechanism

Scoring	Explanation
++	Significant positive effect – proposed approach likely to contribute significantly to meeting this SA objective
+	Minor positive effect – proposed approach likely to contribute slightly to meeting this SA objective
0	Neutral/No impact – proposed approach unlikely to have any effect in meeting this SA objective
-	Minor negative effect – proposed approach likely to slightly hinder meeting this SA objective
--	Significant negative impact – proposed approach likely to significantly hinder this SA objective
?	Uncertain – effects on the SA objective are unclear

3. DEVELOPING AND REFINING ALTERNATIVES AND ASSESSING EFFECTS

3.1. Local Plan Objectives

Task B1: Testing the Plan objectives against the SA framework.

3.1.1 The draft objectives of the Local Plan set out what the plan is aiming to achieve and set the framework for the development. The objectives, in no particular order, are:

1. *Respond positively to locally assessed need for homes and jobs;*
2. *Support and sustain local communities across the borough; big and small, by planning to meet the needs where they are generated;*
3. *Protect high value, important natural and heritage assets; and*
4. *Deliver sustainable growth to support the urban and rural economies and make best use of infrastructure.*

3.1.2 The plan objectives have been tested against the SA framework below.

Table 4: Testing the Plan objectives

SA Objective	Plan Objective			
	1	2	3	4
To ensure that everyone has the opportunity to live in an affordable home.				
To reduce and manage the risk of flooding				
To improve the health and care of the population				
To reduce crime and the fear of crime				
To improve accessibility for everyone to services and facilities				
To improve efficiency of land use				
To protect and improve air quality				
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.				
To protect and enhance natural and heritage assets				
To reduce waste and achieve sustainable waste management				
To maintain and improve water quality and to use water more efficiently				
To achieve and maintain a vibrant economy				

Key		Positive relationship		Uncertain relationship		Negative relationship
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3.1.3 The assessment found that the Local Plan objectives would produce positive effects (in green) or would have an uncertain impact (shown in amber) against the SA objectives. There were no identified negative impacts. This indicates that the Local Plan objectives produce a strong framework to support and encourage sustainable development in Tonbridge and Malling.

3.2. Local Plan

3.2.1 The starting point for the emerging Local Plan, and the identification of potential development locations, is the assessments of the Call for Sites submissions and the resultant *Suitable* sites. These locations form the basis for the following options and alternatives.

Task B2: Developing options including reasonable alternatives

Task B3: Evaluating the likely effects

Building Blocks

3.2.2 The Local Plan Regulation 18 document identifies a series Building Blocks which will form the basis of any development strategy for the borough and reflect the priorities of national policies and Government initiatives. These include:

- Building Block A: Addressing assessed needs on brownfield land within the built-up confines of settlements.
- Building Block B: Addressing assessed needs on land safeguarded in the existing Development Plan for future development, including the area of opportunity.
- Building Block C: Addressing needs on land at low risk of flooding within existing settlements.

3.2.3 These Building Blocks have been appraised as part of the SA process. In assessing the building blocks, the likely effects have been considered and a commentary provided. The full appraisal is set out in Appendix 1.

3.2.4 The Building Blocks perform well in terms of making the best use of land and access to services. However, they score poorly against delivering sufficient housing as the yield from these sites would be insufficient to meet our objectively assessed need. Therefore, although the Building Blocks present a possible development strategy for the emerging Local

Plan, they alone are not considered to be a reasonable alternative and additional options need to be considered.

Guiding Principles

- 3.2.5 The outcome of the assessment of the Building Blocks means that in order to effectively respond to Government policy, local evidence and the draft Plan Objectives we need to consider reasonable alternatives beyond these and therefore beyond existing settlement confines.
- 3.2.6 To help guide the decision-making on which opportunities should be considered and assessed in more detail a set of principles have been prepared. These have been framed by National policy, local evidence and the draft plan objectives. These are:
- Addressing assessed needs adjacent to the principal urban areas of the Medway Gap and Tonbridge, in each housing market area;
 - Addressing assessed needs adjacent to a range of settlements across the borough to help support and sustain local communities, big and small;
 - Addressing assessed needs in reasonable proximity to transport hubs, utilising and building upon existing infrastructure;
 - Addressing assessed needs through development focussed in the least constrained parts of the borough;
 - Providing a mixed portfolio of sites, big and small, to meet a range of needs throughout the duration of the plan period up to 2031, over the short-term (up to 5 years), medium-term (6-10 years) and over the long-term (11-15 years);
 - Delivering a sustainable level of growth to facilitate significant improvements to supporting infrastructure, eg schools, highways and healthcare, for the benefit of existing and new communities; and
 - Focussing on the contribution that larger potential sites could deliver in a proportionate way to meet wider plan objectives and ensure delivery in the plan period.

Reasonable Alternatives

- 3.2.7 These principles help to identify a number of distinct options which could form potential development strategies for the borough that would meet our assessed need. The reasonable alternatives are:

- Option 1: Building Blocks + addressing assessed needs adjacent to the principal urban areas of the Medway Gap and Tonbridge;
- Option 2: Building Blocks + addressing assessed needs adjacent to a range of settlements across the borough;
- Option 3: Building Blocks + addressing assessed needs in proximity to commuter and transport hubs; and
- Option 4: Building Blocks + addressing assessed needs in the least constrained parts of the borough.

3.2.8 The full appraisals for each option are set out in Appendix 1.

Task B4: Considering ways of mitigating adverse effects and maximising beneficial effects

3.2.9 In addition, in order to ensure the most sustainable pattern of development, maximise the use of safeguarded land, minimise negative impacts, and meet our identified needs, the Council has put forward a development strategy which takes forward the most sustainable aspects of each of the options above. This strategy (Option 5) is itself a reasonable alternative and as such has been subject to SA. A full appraisal can be found in Appendix 1.

Appraisal Summary

3.2.10 The Interim SA has identified a series of spatial options for potential development across the borough, each adding to the Building Blocks and each delivering sufficient levels of development to provide employment and housing opportunities to meet the boroughs objectively assessed need.

3.2.11 All options seek to avoid areas of high environmental value and flood risk, and make use of brownfield land whilst delivering the quantum of overall development necessary to meet our identified need. However, all require the consideration of greenfield sites.

3.2.12 Some Options, particularly Options 3 and 4 propose very limited development around Tonbridge, which may not support the long-term vitality and viability of the town centre and provides both limited residential and employment opportunities. In addition, Options 1, 3 and 4 propose a pattern of development which promotes an uneven distribution between the two Housing Market Areas (HMAs) and which may result in an unsustainable pattern of development as people are required to make longer journeys between their place of work and their home.

3.2.13 Option 2 promotes a more equal distribution between the two HMAs, which not only is a more sustainable pattern of development, but also makes provision of some development in the rural communities of the borough. This is important in not only meeting a range of needs, but also

helps to sustain local centres, and the services within those for both the existing and new residents.

- 3.2.14 Option 4 seeks to avoid all designated areas by siting development in the north-east of the borough. Although this could maximise environmental credentials, future development would be confined to one particular area and would therefore be unlikely to address needs where they are generated, which may give rise to an unsustainable pattern of growth. There is also the potential to negatively impact on air quality in this option due to the quantum of development focussed in one particular area, with known air quality issues in close proximity, as well as having a significant impact on existing infrastructure.
- 3.2.15 Options 1-4 also have a high reliance on large strategic sites, which may jeopardize the ability to meet assessed needs in the short-term as the larger sites are likely to have longer lead-in times.
- 3.2.16 In order to secure a sustainable pattern of development that meets the objectively assessed need of a range of communities, whilst seeking to minimise environmental impacts, provide for a mixed portfolio of sites to deliver throughout the plan period, and not over burden existing infrastructure, a combination of these options is likely to be the most sustainable. Option 5 seeks to provide this.

3.3. Monitoring

Task B5: Measures to monitor the significant effects of implementing the Local Plan

- 3.3.1 Monitoring is a key part of the plan process and assists in judging how well the Local Plan delivers against its objectives, and how well it achieves sustainable development.
- 3.3.2 The Council will produce a monitoring framework to sit alongside the Local Plan, in order to measure the impacts of the plan's policies. When the Local Plan is adopted, the results of the monitoring will form part of the Annual Monitoring Report (AMR).

4. CONCLUSION

- 4.1.1 This appraisal process is iterative and is only one step in developing options for the future growth of the Borough. It seeks to highlight tensions and possible solutions, in order to allow decision makers to make the best choice possible on the future development of Tonbridge and Malling.
- 4.1.2 This report will be published alongside the Local Plan Regulation 18 consultation document. Any comments you may have on this document will be gratefully received.

APPENDIX 1: ASSESSMENTS

SA Objective	Decision making criteria	SEA Directive topics
1. To ensure that everyone has the opportunity to live in an affordable home	<p>Will it deliver affordable housing?</p> <p>Will it deliver sufficient supply to meet the identified housing need?</p> <p>Will it provide housing for the aging population?</p> <p>Will it provide for the accommodation needs of Gypsies and Travellers and Travelling Showpeople?</p>	<p>Population</p> <p>Human health</p>
2. To reduce and manage the risk of flooding	<p>Will it reduce the number of people and properties at risk of flooding?</p> <p>Will it manage water efficiently and sustainably?</p>	Water
3. To improve the health and care of the population	<p>Will it promote healthy lifestyles?</p> <p>Will it improve access to healthcare?</p> <p>Will it increase and quantity and quality of publically accessible open space?</p>	<p>Population</p> <p>Human health</p>
4. To reduce crime and the fear of crime		Population
5. To improve accessibility for everyone to services and facilities	<p>Will it provide increased travel choice?</p> <p>Will it support the continued viability of urban and rural centres?</p>	<p>Population</p> <p>Human health</p>
6. To improve efficiency of land use	<p>Will it use land that has been previously developed?</p> <p>Will it avoid the sterilisation of economic mineral reserves?</p> <p>Does it result in the loss of best and most versatile agricultural land?</p>	<p>Biodiversity</p> <p>Soil</p> <p>Material assets</p>
7. To protect and improve air quality	<p>Will it avoid locating development in areas of existing poor air quality?</p> <p>Will it help avoid the creation of additional AQMAs?</p>	<p>Human health</p> <p>Air</p>
8. To ensure that the Borough responds positively, and adapts to, the impacts of	<p>Will it support the use of renewable resources?</p> <p>Will it promote energy efficiency?</p>	Climatic factors

Interim Sustainability Appraisal Report

climate change		
9. To protect and enhance natural and heritage assets	<p>Will it minimise habitat fragmentation?</p> <p>Will it provide increased access to, and understanding of the historic environment?</p> <p>Will it conserve and enhance designated landscapes?</p>	<p>Biodiversity</p> <p>Fauna</p> <p>Flora</p> <p>Cultural heritage</p> <p>Landscapes</p>
10. To reduce waste and achieve sustainable waste management	<p>Will it reduce waste generation?</p> <p>Will encourage the re-use of materials?</p>	Material assets
11. To maintain and improve water quality and to use water more efficiently	<p>Will it avoid a deterioration of the quality of waterways and groundwater?</p> <p>Will it facilitate water re-use and recycling?</p>	Water
12. To achieve and maintain a vibrant economy	<p>Will it encourage the rural economy and diversification?</p> <p>Will it contribute to providing a range of employment opportunities in accessible locations?</p> <p>Will it support town centre vitality?</p>	Population

Building Blocks A+B+C

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	--	--	-	Although this will deliver a significant quantum of development over the plan period, the strategic nature of the largest site (Bushey Wood Area of Opportunity) means that delivery in this particular location is likely to be later in the plan period, leaving a greater shortfall early on. The quantum of overall development will be insufficient to meet our Objectively Assessed Need (OAN), which will result in an undersupply of all types of housing.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.
To improve the health and care of the population	?	+	+	In the short-term, due to the low quantum of development anticipated, provision of new healthcare and open space facilities is unlikely so it is considered to have uncertain impact as an increase in population may place strain on existing resources. However development at the strategic location in the medium to long-term could deliver new facilities and open spaces within the development. This would not only improve access for the new population, but improve facilities for the existing community.
To reduce crime and the fear of crime	?	?	?	In the short-term, development of brownfield sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under used sites. Due to the small quantum of development involved in the short-term, the impact on actual crime levels is likely to be minimal. Once

				developed, further impacts are unlikely. In the medium to long-term, the development of the strategic site may bring increased natural surveillance to the area, and may combat illegal access issues.
To improve accessibility for everyone to services and facilities	+	+	+	Development in some existing settlements can help support the viability of those centres. Due to the small quantum of development, new facilities are unlikely to be incorporated into these small sites. However in the medium to long-term, the strategic site may deliver improved services and facilities which will be accessible not only to the new population, but existing communities too.
To improve efficiency of land use	++	?	-	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in plan the period and once developed, greenfield sites would need to be considered. Development at the strategic site could include the use of greenfield land and land currently safeguarded for mineral extraction, although this is likely to come forward later in the plan period.
To protect and improve air quality	?	?	?	The locations are all situated outside existing AQMAs and due to the minor quantum of development in the short-term, impacts are likely to be minimal. In the medium to long-term, the impact from the quantum of development associated with the strategic site is also uncertain due to its proximity to the nearby A20 and M20 AQMAs.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	0	?	?	The low quantum of development in the short-term is unlikely to deliver gains in renewable resources or energy efficiency, therefore any impact is likely to be neutral. In the medium to long-term the strategic site could deliver against this objective, but the impact at present is uncertain.

To protect and enhance natural and heritage assets	+	+	?	Designated landscapes would be conserved as these sites fall outside of such areas. Habitats fragmentation should be minimal on the small sites due to the small quantum of development. There is some potential for habitat fragmentation at the strategic site, however it is located outside of areas designated for nature conservation value and has the potential to deliver enhancements to local flora and fauna in the long-term. Impacts on the historic environment are likely to be minimal.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation and the scale of development is unlikely to support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	?	?	?	Due to the quantum of development, schemes for water re-use and recycling is unlikely. Impact on waterways and ground water are uncertain.
To achieve and maintain a vibrant economy	+	?	?	Development close to existing settlements can support the vitality of those centres through an increased population making use of their services and facilities. Some sites may also help support the rural economy providing locations for new homes and businesses. Support for the town centre will be limited due to the small quantum of development proposed in Tonbridge itself and the wider HMA. These sites are likely to come forward earlier in the plan period. As the larger strategic sites come forward later in the plan period, the impact on the town centre is unknown as new residents may preferentially choose an alternative town centre to meet their needs.

Summary: Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land, and supporting local economies, the quantum of development will be insufficient to meet identified need. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, a large strategic site may have a long

lead in time which means that it is more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.

Option 1: Building Blocks + focussing development adjacent to the existing urban areas of the Medway Gap and Tonbridge.

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	+	+	+	This will deliver a quantum of development in excess of that needed to meet our Objectively Assessed Need (OAN). This should allow for a sufficient supply of all types of housing around the principal urban areas. However there is limited opportunity for growth in the rural areas which may not address the needs of these smaller communities.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.
To improve the health and care of the population	?	+	+	Development in these locations should allow good access to existing health and open space facilities. However the quantum of development may put these facilities under strain, particularly in the short-term, until new facilities are provided (either via contributions or direct on-site provision for some of the strategic sites). These new facilities, once in place, would be accessible to both new and existing communities.
To reduce crime and the fear of crime	?	?	?	Development of some sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under used sites. However the quantum of

				development would result in an increase in population which may result in an increase in overall crime levels. At present the precise impact is uncertain.
To improve accessibility for everyone to services and facilities	+	+	+	The increase in population in proximity to the urban centres of Tonbridge and the Medway Gap should ensure good access to existing services for the new populations as well as the viability of those urban centres. A range of travel choice would also be available. However this option proposes minimal development in settlements outside of these areas and would not therefore greatly support rural centres.
To improve efficiency of land use	+	?	?	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in the plan period and once developed, greenfield sites would need to be considered. Although these would avoid high quality agricultural land, it would impact on some Minerals Safeguarding Areas. The impact of this is uncertain.
To protect and improve air quality	+	?	?	Although these locations are all situated outside existing AQMAs, some are in close proximity. The quantum of development focussed around the urban areas is likely to result in increased levels of traffic and associated air pollution which may exacerbate air quality issues in some areas, particularly in the long-term. However focussing growth in and around the urban centres provides access to a range of transport choices which may help to offset some of these impacts, and strategic development may provide new opportunities to deliver infrastructure improvements to help alleviate existing air quality issues.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	?	?	?	Small sites in the short-term are unlikely to promote renewable technologies, however the large strategic sites could provide opportunities for neighbourhood scale heating

				networks in the medium to long-term. However the precise impact is uncertain.
To protect and enhance natural and heritage assets	+	+	?	These locations avoid areas of high value natural and heritage assets. The quantum of development, particularly on the strategic sites, could deliver some gains in biodiversity and heritage management, although the precise impact is uncertain and is unlikely in the short-term. However conversely, the increase in population may result in an increase in visitor numbers to surrounding assets, some of which are high value, which may need to be managed in order to avoid negative impacts, particularly in the long-term.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation. There is uncertainty as to whether the quantum of development would support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	0	?	?	These locations avoid the functional flood plain and areas at high risk from flooding so run-off is unlikely to directly impact on waterways. The strategic sites may offer opportunities in the medium to long-term for neighbourhood scale water re-use and recycling schemes, but this is uncertain at this stage. The impact of the small scale sites likely to come forward in the short-term are expected to be neutral. The quantum of development could put pressure on existing water resources and supply in the medium to long-term.
To achieve and maintain a vibrant economy	+	+	?	These sites are in close proximity to the existing urban centres which should help to support the vitality of the town centre in Tonbridge. The quantum of overall development could support a range of employment opportunities in these locations. However the impact on the rural economy is likely

				to be uncertain as there are limited opportunities in these areas and in the long-term rural businesses may be unsustainable.
Summary	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land, supporting urban economies and delivering the quantum of development necessary to meet our identified need, this option does require the use of greenfield sites and does not provide sufficient support to the rural communities or economy. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.			

Option 2: Building Blocks + focussing development adjacent to a range of the settlements in the borough.

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	++	++	++	This will deliver a quantum of development in excess of that needed to meet our Objectively Assessed Need (OAN). This should allow for a sufficient supply of all types of housing across a range of settlements, large and small, urban and rural therefore meeting a diverse range of needs.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.
To improve the health and care of the population	?	+	+	Development in these locations should allow good access to existing health and open space facilities. However the quantum of development may put these facilities under strain

				in some locations, particularly in the short-term, until new facilities are provided (either via contributions or direct on-site provision for some of the strategic sites). These new facilities, once in place, would be accessible to both new and existing communities. Development around some of the rural settlements may also increase the demand for such services which may help to support existing facilities which may be under-used or at risk as present.
To reduce crime and the fear of crime	?	?	?	Development of some sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under-used sites. However the quantum of development would result in an increase in population which may result in an increase in overall crime levels. At present the precise impact is uncertain.
To improve accessibility for everyone to services and facilities	++	++	++	The increase in population across a range of settlements should promote access to existing services for the new populations as well as fostering viability of those urban and rural centres. A range of travel choices may also be available, particularly around the urban areas and larger sites.
To improve efficiency of land use	+	?	?	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in the plan period and once developed, greenfield sites would need to be considered. Although these would avoid high quality agricultural land, it could impact on some Minerals Safeguarding Areas. The impact of this is uncertain.
To protect and improve air quality	+	?	-	Although these locations are all situated outside existing AQMAs, some are in close proximity. The quantum of development is likely to result in increased levels of traffic and

				associated air pollution which may exacerbate air quality issues in some areas, particularly in the long-term. Growth in and around the urban centres provides access to a range of transport choices which may help to offset some of these impacts and strategic development may provide new opportunities to deliver infrastructure improvements to help alleviate existing air quality issues. However development at the rural settlements may have limited access to a range of travel choices, therefore increase car usage in some locations may occur. The precise impact is uncertain.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	?	?	?	Small sites in the short-term are unlikely to promote renewable technologies, however the large strategic sites could provide opportunities for neighbourhood scale heating networks in the medium to long-term. However the precise impact is uncertain.
To protect and enhance natural and heritage assets	+	+	?	These locations avoid areas of high value natural and heritage assets. The quantum of development, particularly on the strategic sites, could deliver some gains in biodiversity and heritage management, although the precise impact is uncertain and is unlikely in the short-term. However conversely, the increase in population may result in an increase in visitor numbers to surrounding assets, some of which are of high value, which may need to be managed in order to avoid negative impacts, particularly in the long-term.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation. There is uncertainty as to whether the quantum of development would support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	0	0	?	These locations avoid the functional flood plain and areas at high risk of flooding so run-off is unlikely to directly impact on waterways. The strategic sites may offer opportunities in the

				medium to long-term for neighbourhood scale water re-use and recycling schemes, but this is uncertain at this stage. The impact of the small scale sites likely to come forward in the short to medium-term are expected to be neutral. The quantum of development could put pressure on existing water resources and supply in the long-term.
To achieve and maintain a vibrant economy	+	++	++	These sites are in close proximity to a range of existing urban and rural centres which should help to support the vitality of the town centre in Tonbridge as well as the rural economy. The quantum of overall development could support a range of employment opportunities at a number of locations.
Summary	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land and delivering the quantum of development necessary to meet our identified need, this option does require the use of some greenfield land. The dispersed pattern of development at a range of settlements across the borough provides support for both the urban and rural economies and attempts to address the needs of a range of communities. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.			

Option 3: Building Blocks + focussing development around transport hubs.

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	+	+	+	Although this will deliver a quantum of development in excess of that needed to meet our Objectively Assessed Need (OAN), which should allow for a sufficient supply of all types of housing across a range of settlements with existing good

				transport links. However the pattern of development would not be equally distributed between the two Housing Market Areas (HMA), and this may not meet the housing need where it is generated, and in turn could result in an unsustainable pattern of development.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.
To improve the health and care of the population	?	+	+	Development in these locations should allow good access to existing health and open space facilities. However the quantum of development may put these facilities under strain, particularly in the short-term, until new facilities are provided (either via contributions or direct on-site provision for some of the strategic sites). These new facilities, once in place, would be accessible to both new and existing communities.
To reduce crime and the fear of crime	?	?	?	Development of some sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under-used sites. However the quantum of development would result in an increase in population which may result in an increase in overall crime levels. At present the precise impact is uncertain.
To improve accessibility for everyone to services and facilities	+	?	?	The increase in population in proximity to the transport hubs should ensure good access to existing services for the new populations as well as the viability of those centres. A range of travel choices would also be available. However this option proposes minimal development in and around Tonbridge which would provide limited support for the town centre and rural areas. The impact on the viability of these centres is

				uncertain, particularly in the medium to long-term.
To improve efficiency of land use	+	?	?	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in the plan period and once developed, greenfield sites would need to be considered. Although these would avoid high quality agricultural land, it could impact on some Minerals Safeguarding Areas. The impact of this is uncertain.
To protect and improve air quality	+	?	?	Although these locations are all situated outside existing AQMAs, some are in close proximity. The quantum of development focussed around the transport hubs is likely to result in increased levels of traffic and associated air pollution which may exacerbate air quality issues in some areas, particularly in the long-term. However focussing growth in and around these centres provides access to a range of transport choices which may help to offset some of these impacts and strategic development may provide new opportunities to deliver infrastructure improvements to help alleviate existing air quality issues.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	?	?	?	Small sites in the short-term are unlikely to promote renewable technologies, however the large strategic sites could provide opportunities for neighbourhood scale heating networks in the medium to long-term. However the precise impact is uncertain.
To protect and enhance natural and heritage assets	+	+	?	These locations avoid areas of high value natural and heritage assets. The quantum of development, particularly on the strategic sites, could deliver some gains in biodiversity and heritage management, although the precise impact is uncertain and is unlikely in the short-term. However

				conversely, the increase in population may result in an increase in visitor numbers to surrounding assets, some of which are of high value, which may need to be managed in order to avoid negative impacts, particularly in the long-term.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation. There is uncertainty as to whether the quantum of development would support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	0	?	?	These locations avoid the functional flood plain and areas at high risk of flooding so run-off is unlikely to directly impact on waterways. The strategic sites may offer opportunities in the medium to long-term for neighbourhood scale water re-use and recycling schemes, but this is uncertain at this stage. The impact of the small scale sites likely to come forward in the short to medium-term are expected to be neutral. The quantum of development could put pressure on existing water resources and supply in the long-term.
To achieve and maintain a vibrant economy	+	?	?	These sites are in close proximity to settlements which should help to support the vitality of their centres. The quantum of development around Tonbridge would provide some limited support to the town centre. However as the larger strategic sites come forward later in the plan period, the impact on the town centre is unknown as these opportunities fall within the Maidstone and Malling HMA to the north and new residents may preferentially choose an alternative town centre to meet their needs. The quantum of overall development could support a range of employment opportunities in these locations. However the impact on the rural economy is likely to be uncertain as there are limited opportunities in these areas and in the long-term rural businesses may be unsustainable.

Summary	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land, supporting the economies of urban and larger rural centres and delivering the quantum of development necessary to meet our identified need, this option does require the use of greenfield sites and does not provide sufficient support to the smaller rural communities or economy. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame. In addition, development focused around transport hubs would not address the needs of both HMAs and could deliver an unsustainable pattern of development.
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Option 4: Building Blocks + focussing development in the unconstrained part of the borough

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	+	+	+	This will deliver a quantum of development in excess of that needed to meet our Objectively Assessed Need (OAN), which should allow for a sufficient supply of all types of housing. However the pattern of development would not be equally distributed between the two Housing Market Areas (HMA), and this may not meet the housing need where it is generated, and in turn could result in an unstainable pattern of development.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.

To improve the health and care of the population	?	+	+	Development in these locations should allow access to existing health and open space facilities. However the quantum of development may put these facilities under strain, particularly in the short-term, until new facilities are provided (either via contributions or direct on-site provision for some of the strategic sites). These new facilities, once in place, would be accessible to both new and existing communities.
To reduce crime and the fear of crime	?	?	?	Development of some sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under-used sites. However the quantum of development would result in an increase in population which may result in an increase in overall crime levels. At present the precise impact is uncertain.
To improve accessibility for everyone to services and facilities	+	?	?	The increase in population around the Medway Gap area would have access to existing services and should support the viability of those urban and rural centres in the vicinity. The quantum of development may offer an increased range of travel choices to new and existing populations, particularly in association with the strategic sites. However this option proposes minimal development to support the town centre in Tonbridge or in those rural centres outside of the area and may have an uncertain impact on their viability in the medium to long-term..
To improve efficiency of land use	+	?	?	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in the plan period and once developed, greenfield sites would need to be considered. Although these would avoid high quality agricultural land, it would impact on some Minerals Safeguarding Areas. The impact of this is uncertain.
To protect and improve air quality	?	?	-	Although these locations are all situated outside existing

				AQMAs, some are in close proximity. The quantum of development focussed around the Medway Gap area over the whole plan period is likely to result in increased levels of traffic and associated air pollution which may exacerbate air quality issues along the A20 and M20, particularly in the long-term as more development takes place. However strategic development may provide new opportunities to deliver infrastructure improvements to help alleviate existing air quality issues.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	?	?	?	Small sites in the short-term are unlikely to promote renewable technologies, however the large strategic sites could provide opportunities for neighbourhood scale heating networks in the medium to long-term. However the precise impact is uncertain.
To protect and enhance natural and heritage assets	+	?	?	These locations avoid areas of high value natural and heritage assets. The quantum of development, particularly on the strategic sites, could deliver some gains in biodiversity and heritage management, although the precise impact is uncertain and is unlikely in the short-term. Conversely, the increase in population may result in an increase in visitor numbers to surrounding assets which may need to be managed in order to avoid negative impacts, particularly in the long-term. The potential impacts on air quality in the Medway Gap, may also impact negatively on natural assets in the area, some of which are of high quality and are sensitive to air quality conditions, particularly as more development takes place in the medium to long-term.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation. There is uncertainty as to whether the quantum of

				development would support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	?	?	?	These locations avoid the functional flood plain and areas at high risk of flooding so run-off is unlikely to directly impact on waterways. The strategic sites may offer opportunities in the medium to long-term for neighbourhood scale water re-use and recycling schemes, but this is uncertain at this stage. The impact of the small scale sites likely to come forward in the short-term are expected to be neutral. The quantum of development focussing in one main location could put pressure on existing water resources and supply in the medium to long-term.
To achieve and maintain a vibrant economy	+	?	?	Support for the town centre will be limited due to the small quantum of development proposed in Tonbridge itself and the wider HMA. These sites are likely to come forward earlier in the plan period. As the larger strategic sites come forward later in the plan period, the impact on the town centre is unknown as these opportunities fall within the Maidstone and Malling HMA to the north and new residents may preferentially choose an alternative town centre to meet their needs. The quantum of overall development could support a range of employment opportunities but these would be focussed around the Medway Gap. The impact on the rural economy is likely to be uncertain as the potential development sites are focussed around communities in the north of the borough, meaning support for the rural economy outside of these areas would be limited.
Summary	Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land and delivering the quantum of development necessary to meet our identified need, this option does require the use of greenfield sites and provides limited support to Tonbridge and the wider rural community. This could detrimentally impact on the vitality and			

	<p>viability of the town centre. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame. In addition the concentration of development around the Medway Gap would not address the needs of both HMAs and could deliver an unsustainable pattern of development.</p>
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Option 5: Hybrid Strategy

SA Objectives	Assessment			Comments
	Short	Medium	Long	
To ensure that everyone has the opportunity to live in an affordable home.	++	++	++	This will deliver a quantum of development in excess of that needed to meet our Objectively Assessed Need (OAN). This should allow for a sufficient supply of all types of housing across a range of settlements, large and small, urban and rural therefore meeting a diverse range of needs.
To reduce and manage the risk of flooding	++	++	++	All of the sites avoid areas at high risk of flooding and the functional flood plain allowing natural fluvial processes to occur. Some employment sites are located in areas at risk, but this is acceptable for that use. Development of these areas will therefore not increase the number of properties at risk.
To improve the health and care of the population	?	+	+	Development in these locations should allow good access to existing health and open space facilities. However the quantum of development may put these facilities under strain in some locations, particularly in the short-term, until new facilities are provided (either via contributions or direct on-site provision for some of the strategic sites). These new facilities, once in place, would be accessible to both new and existing communities. Development around some of the rural

				settlements may also increase the demand for such services which may help to support existing facilities which may be under-used or at risk as present.
To reduce crime and the fear of crime	?	?	?	Development of some sites may reduce the perceived fear of crime and anti-social behaviour which may be associated with vacant or under-used sites. However the quantum of development would result in an increase in population which may result in an increase in overall crime levels. At present the precise impact is uncertain.
To improve accessibility for everyone to services and facilities	++	++	++	The increase in population across a range of settlements should promote access to existing services for the new populations as well as fostering viability of those urban and rural centres. A range of travel choices may also be available, particularly around the urban areas and larger sites.
To improve efficiency of land use	+	?	?	Although this may make use of the available previously developed land, these locations are anticipated to come forward early in the plan period and once developed, greenfield sites would need to be considered. Although these would avoid high quality agricultural land, it could impact on some Minerals Safeguarding Areas. The impact of this is uncertain.
To protect and improve air quality	+	?	?	Although these locations are all situated outside existing AQMAs, some are in close proximity. The quantum of development is likely to result in some increased levels of traffic which may exacerbate air quality issues in some areas, particularly in the long-term. However, the precise impact is uncertain. Growth in and around the urban and larger rural centres provides access to a range of transport choices which may help to offset some of these impacts and strategic development may provide new opportunities to deliver infrastructure improvements to help alleviate existing air

				quality issues. The precise impact is uncertain.
To ensure that the Borough responds positively, and adapts to, the impacts of climate change.	?	?	?	Small sites in the short-term are unlikely to promote renewable technologies, however the large strategic sites could provide opportunities for neighbourhood scale heating networks in the medium to long-term. However the precise impact is uncertain.
To protect and enhance natural and heritage assets	+	+	?	These locations avoid areas of high value natural and heritage assets, with one exception, a safeguarded site, that lies within the Kent Downs Area of Outstanding Natural Beauty (AONB). The quantum of development, particularly on the strategic sites, could deliver some gains in biodiversity and heritage management, although the precise impact is uncertain and is unlikely in the short-term. However conversely, the increase in population may result in an increase in visitor numbers to surrounding assets which may need to be managed in order to avoid negative impacts, particularly in the long-term.
To reduce waste and achieve sustainable waste management	?	?	?	An increase in population is likely to increase waste generation. There is uncertainty as to whether the quantum of development would support new waste recycling facilities. Therefore the impacts are uncertain.
To maintain and improve water quality and to use water more efficiently	0	?	?	These locations avoid the functional flood plain and areas at high risk of flooding so run-off is unlikely to directly impact on waterways. The strategic sites may offer opportunities in the medium to long-term for neighbourhood scale water re-use and recycling schemes, but this is uncertain at this stage. The impact of the small scale sites likely to come forward in the short to medium-term are expected to be neutral. The quantum of development could put pressure on existing water resources and supply in the long-term.

To achieve and maintain a vibrant economy	+	++	++	<p>These sites are in close proximity to a range of existing urban and rural centres which should help to support the vitality of the town centre in Tonbridge as well as the rural economy. The quantum of overall development could support a range of employment opportunities at a number of locations.</p>
Summary	<p>Although avoiding areas of high environmental value and flood risk, making use of existing brownfield land and delivering the quantum of development necessary to meet our identified need, this option does require the use of some greenfield land. The dispersed pattern of development at a range of settlements across the borough provides support for both the urban and rural economies and attempts to address the needs of a range of communities, including significant support for the town centre. A distribution of sites across both HMAs supports a sustainable pattern of development. The small sites are likely to result in short-term small scale impacts which could be mitigated where necessary. However, the large strategic sites may have a long lead in time which could mean that they are more likely to begin delivery in the medium to long-term, and therefore any impacts are also likely to see a similar time frame.</p>			

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Tonbridge and Malling Borough Council

Local Plan

**Habitats Regulations
Assessment:
Screening Report**

September 2016



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1. HABITATS REGULATIONS ASSESSMENT

1.1. Introduction

- 1.1.1 The purpose of the Habitats Regulations Assessment (HRA) of land use plans is to ensure that consideration is given to sites protected by European Directives as part of the development of planning policy.
- 1.1.2 The emerging Tonbridge and Malling Local Plan is a document which will contain the strategic policies, site allocations and development management policies which will influence development in the Borough until 2031.
- 1.1.3 This report presents the initial findings of the first stage of the HRA process, known as Screening. It identifies the likely potential significant adverse effects on protected European sites, both within the borough and those in close proximity, by development strategies set out in the Regulation 18 consultation document.

1.2. Legislation

- 1.2.1 The need for Habitats Regulations Assessment (also known as Appropriate Assessment) is set out within Article 6 of the EC Habitats Directive 1992. The Habitats Directive has been transposed into British Law by the Conservation of Habitats Regulations, which require plan-making authorities to appropriately assess the implications of their land use plans on European Sites. These include those designated as:
- Special Area of Conservation (SACs) – sites designated for flora, fauna and habitats of community interest under powers derived from the Habitats Directive;
 - Special Protection Areas (SPAs) – sites designated to conserve the habitat of protected wild birds to ensure their survival and reproduction in their area of distribution under powers derived from the Birds Directive (Directive 2009/147/EC);
 - Ramsar sites – wetland sites of global importance; and
 - Possible SACs, potential SPAs and proposed Ramsar sites.

1.3. The Process

- 1.3.1 In December 2012, draft guidance was produced by the Department for Environment Food & Rural Affairs on The Habitats and Wild Birds Directives in England and its seas. Although this has not been updated, it usefully sets out the process for undertaking HRA as:
- Stage 1 – Screening for likely significant effects

- Stage 2 – Appropriate Assessment
- Stage 3 – Derogations (alternative solutions and mitigation)

Screening

- 1.3.2 The Screening stage aims to identify whether a plan is likely to have a significant effect on a European Site and in doing so, determines whether subsequent stages of the HRA process are required.
- 1.3.3 As part of the Screening, the authority has to consider whether a significant effect is likely to occur, either solely as a result of the individual plan under consideration, or in combination with other plans (either currently in production or adopted).
- 1.3.4 Where there is insufficient information to assess whether a plan is likely or not to have a significant effect on a European Site, it should be assumed that a risk may exist. This approach is known as the 'precautionary principle' and would result in further Stage 1 assessment being undertaken at a later plan making stage when more information is available, or that the HRA proceeds to Stage 2.

Appropriate Assessment

- 1.3.5 If potential for significant effects is identified in Stage 1, then the HRA progresses to Stage 2 at which point appropriate assessment (AA) is carried out to establish the potential effects of the plan on the European Sites integrity. The AA will consider the sites qualifying features, its conservation objectives and they environmental conditions which support the site's integrity.
- 1.3.6 If it is found that a plan will impact on the sites integrity, then it will be necessary to proceed to Stage 3 in order to consider alternative solutions and mitigation measures to prevent negative impacts arising.

Alternative solutions and mitigation

- 1.3.7 Where significant effects are identified, alternative solutions or mitigation measures should be considered in order to fully cancel out any adverse effects of the plan on the European site. Where it is not possible to completely eradicate a plan's negative impacts, mitigation measures should ensure that the overall coherence of the network of European sites is protected.
- 1.3.8 In exceptional circumstances, an authority can implement a plan even when the HRA concludes that there would be a significant adverse effect on a Europeans site's integrity that could not be overcome by choosing alternative solutions or by mitigation, if the option is justified by 'imperative reasons of overriding public interest ' (IROPI). In these cases compensatory measures must be put in place to offset negative impacts.

1.4. Protected Sites

1.4.1 There are two European Sites within Tonbridge and Malling.

- North Downs Woodland SAC
- Peters Pit SAC

1.4.2 There are three further European Sites within 7km of the borough boundary and, taking a precautionary approach, should also be subject to the HRA process. These are:

- Queensdown Warren SAC
- Medway Estuary and Marshes SPA
- Medway Estuary and Marshes Ramsar.

1.4.3 Appendix 1 contains a map illustrating these sites.

2. SCREENING THE PROTECTED SITES

2.1. North Downs Woodland SAC

Site Area	287.55ha
Local Authority coverage	Tonbridge and Malling Borough Council, Gravesham Council, Medway Council, Maidstone Borough Council.
Site Description	This site consists of mature Beech forests and Yew woods on steep slopes. The stands lie within a mosaic of scrub and other woodland types and are the most easterly of the Beech woodland sites selected. Parts of the woods were affected by the storm of 1987. Small areas of unimproved chalk grassland are also present.
Qualifying Features	<i>Taxus baccata</i> woods of the British Isles (Yew-dominated woodland) <i>Asperulo-Fagetum</i> beech forests (Beech forests on neutral to rich soils) Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (Dry grasslands and scrublands on chalk or limestone)
Component SSSI Condition	Halling to Trottscliffe Escarpment – all of the SSSI units within the SAC and adjacent to it, are in favourable condition or unfavourable - recovering condition with no identified threats to condition ¹ . Wouldham to Detling Escarpment – all of the SSSI units within the SAC and adjacent to it, are in favourable condition or unfavourable - recovering condition with no identified threats to condition ²
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; <ul style="list-style-type: none"> • The extent and distribution of the qualifying natural habitats • The structure and function (including typical species) of the qualifying natural habitats,

1

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1003779&SiteName=Halling&countyCode=&responsiblePerson=>

2

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001339&SiteName=wouldham&countyCode=&responsiblePerson=>

	<p>and,</p> <ul style="list-style-type: none"> The supporting processes on which the qualifying natural habitats rely
Pressures/Threats	<p>Public Access/Disturbance Forestry and woodland management Invasive species Air pollution: impact of atmospheric nitrogen deposition.</p>
Local Plan Implications (alone and in combination)	<p>There is the potential for the emerging Local Plan to result in increased traffic flows along the A229, which is in close proximity to the Wouldham to Detling Escarpment SSSI section of the SAC. These increased traffic flows may increase air pollution. Natural England already identify that nitrogen deposition exceeds site relevant critical loads³. The combination impacts of the TMBC Local Plan, along with the growth strategies of neighbouring authorities including Medway and Maidstone Councils may exacerbate this. In addition the proposed new Lower Thames Crossing may also increase traffic flows along the A229 in the long term which may also impact on this SAC. However, work by Natural England identifies that vegetation can be impacted by exposure to vehicle pollution at distances of up to 200m from roads, but that these impacts are greatest within the first 50-100m from roads⁴. Only the very western extent of the SAC (part of the Wouldham to Detling Escarpment SSSI) falls within 200m of the A229, and none falls within 50-100m. Therefore any increase in air pollution levels is only likely to have an impact on a very small area of the SAC, which is currently in favourable condition.</p> <p>There is also potential for the new Local Plan to result in increased public access to the natural environment from an increase in residential population of the Borough who may seek to access these sites for leisure purposes. At present, the threat is predominantly from off-road vehicles and all-terrain bikes coming off the Public Rights of Way (PROW). The precise impact of the Local Plan, both alone and in combination, is at present unknown but due to the precise nature of the threat, the direct impact is likely to be minimal. In addition limited growth is proposed in the north west of the borough,</p>

³ <http://publications.naturalengland.org.uk/publication/6363401429188608?category=6149691318206464>

⁴ <http://publications.naturalengland.org.uk/publication/6331846246793216>

	therefore possibly minimising impacts on the Halling to Trottiscliffe Escarpment SSSI section of the SAC.
Conclusion	The impact of the Local Plan on public access issues is unlikely to significantly impact the conservation objectives as mitigation could be incorporated to help manage impacts. There is potential for a negative impact on air pollution along the A229 corridor, however this is unlikely to significantly impact the conservation objectives due to the small area involved.

2.2. Peters Pit SAC

Site Area	28.30ha
Local Authority coverage	Tonbridge and Malling Borough Council
Site Description	Peter's Pit is an old chalk quarry situated in the North Downs, with large ponds situated amongst grassland, scrub and woodland. The ponds have widely fluctuating water levels and large great crested newt <i>Triturus cristatus</i> populations have been recorded breeding here.
Qualifying Features	<i>Triturus cristatus</i> (Great crested newt)
Component SSSI Condition	Peter's Pit - all of the SSSI units within the SAC and adjacent to it, are in favourable condition with no identified threats to condition ⁵ .
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; <ul style="list-style-type: none"> • The extent and distribution of the habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on which the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site.
Pressures/Threats	None at present.
Local Plan Implications (alone and in combination)	The potential impact of the Local Plan is likely to be minimal as there is limited potential for growth in close proximity to the site and public access is limited.

⁵ <https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1001745>

Conclusion	The impact of the Local Plan is unlikely to significantly impact the conservation objectives.
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2.3. Queendown Warren SAC

Site Area	14.28ha
Local Authority coverage	Maidstone Borough Council
Distance from Tonbridge & Malling boundary	c. 6km
Site Description	This site hosts the priority habitat type “orchid rich sites”. Queendown Warren contains an important assemblage of rare and scarce species, including Early Spider-orchid <i>Ophrys sphegodes</i> , Burnt orchid <i>Orchis ustulata</i> and Man orchid <i>Aceras anthropophorum</i> .
Qualifying Features	Semi-natural dry grasslands and scrubland facies: on calcareous substrates (<i>Festuco-Brometalia</i>) (important orchid sites). (Dry grasslands and scrublands on chalk or limestone, including important orchid sites).
Component SSSI condition	Queendown Warren - all of the SSSI units are in favourable condition with no identified threats to condition ⁶ .
Conservation Objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring; <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely
Pressures/Threats	Species decline Habitat fragmentation Air pollution: risk of atmospheric nitrogen deposition.
Local Plan Implications (alone and in combination)	The Local Plan is unlikely to directly impact on species decline and habitat fragmentation as the site lies outside of the borough. There is some potential for indirect in combination impacts on air pollution as a result of increased traffic along the M2, which is in relatively close proximity to the SAC. In addition the proposed new Lower Thames

⁶

<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1001523&SiteName=queendown&countyCode=&responsiblePerson=>

	<p>Crossing may also increase traffic flows along the M2. Work by Natural England identifies that vegetation can be impacted by exposure to vehicle pollution at distances of up to 200m from roads, but that these impacts are greatest within the first 50-100m from roads⁷. Only the very eastern extent of the SAC falls within 200m of the M2, and none falls within 50-100m. Therefore any increase in air pollution levels is only likely to have an impact on a very small area of the SAC, which is currently in favourable condition.</p>
Conclusion	<p>There may be some potential to negatively impact on air pollution along the M2 corridor as a result of an increase in population. However Natural England identify that although nitrogen deposition exceeds the site-relevant critical load for ecosystem protection, the sensitive features are currently considered to be in favourable condition and therefore the impact is unlikely to significantly impact the conservation objectives due to the small area involved.</p>

2.4. Medway Estuary and Marshes SPA/Ramsar

Site Area	4686.32ha
Local Authority coverage	Medway Council, Swale Borough Council
Distance from Tonbridge & Malling boundary	c. 6km
Site Description	<p>A complex of rain-fed, brackish, floodplain grazing marsh with ditches, and intertidal saltmarsh and mudflat. These habitats together support internationally important numbers of wintering waterfowl. Rare wetland birds breed in important numbers. The saltmarsh and grazing marsh are of international importance for their diverse assemblages of wetland plants and invertebrates.</p>
Qualifying Features	<p>Avocet (<i>Recurvirostra avosetta</i>), Breeding Avocet (<i>Recurvirostra avosetta</i>), Non-breeding Breeding bird assemblage, Breeding Dark-bellied Brent goose (<i>Branta bernicla bernicla</i>), Non-breeding Dunlin (<i>Calidris alpina alpina</i>), Non-breeding Grey plover (<i>Pluvialis squatarola</i>), Non-breeding Red Knot (<i>Calidris canutus</i>), Non-breeding Little tern (<i>Sternula albifrons</i>), Breeding Northern Pintail (<i>Anas acuta</i>), Non-breeding</p>

⁷ <http://publications.naturalengland.org.uk/publication/6331846246793216>

	Common Redshank (<i>Tringa totanus</i>), Non-breeding Ringed plover (<i>Charadrius hiaticula</i>), Non-breeding Common Shelduck (<i>Tadorna tadorna</i>), Non-breeding Waterbird assemblage, Non-breeding
Component SSSI condition	Medway Estuary and Marshes - all of the SSSI units in the SPA/Ramsar within 7km of TMBC, and those SSSI units immediately adjacent, are in unfavourable - recovering condition but with no identified threats to condition ⁸
Conservation Objectives	The objectives are to ensure that, subject to natural change, the integrity of the site is maintained or restored as appropriate, and that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring: <ul style="list-style-type: none"> • The extent and distribution of the habitats of the qualifying features • The structure and function of the habitats of the qualifying features • The supporting processes on which the habitats of the qualifying features rely • The populations of qualifying features • The distribution of qualifying features within the site.
Pressures/Threats	Public Access/Disturbance Invasive species Changes in abiotic and biotic conditions. Dredging. Erosion.
Local Plan Implications (alone and in combination)	The Local Plan will not directly impact on dredging, erosion, invasive species or abiotic/biotic conditions as the site lies outside of the borough. There is some potential for in an increase in public access for recreational purposes as a result of future growth, both alone and in combination with other neighbouring authorities, as increases in population may increase the number of visitors to such a site which may increase disturbance to species.
Conclusion	There may be some potential for increased recreational access to impact on the site through disturbance of species. However Natural England identify that bird numbers have declined significantly across the SSSIs for reasons which are not clear and management is in place to maintain the habitat required to support the assemblage of wintering and breeding. Therefore the Local Plan,

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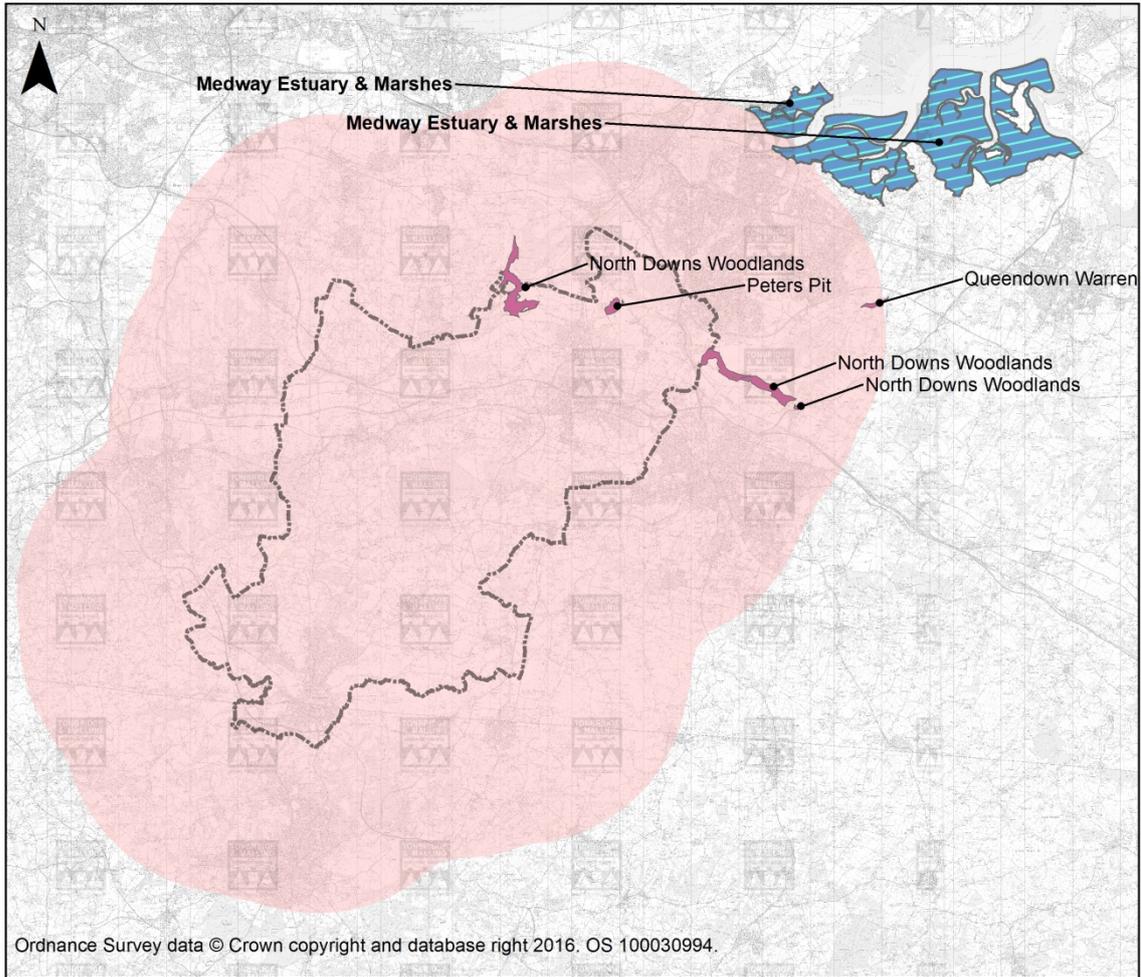
<https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=S1000244&SiteName=medway&countyCode=&responsiblePerson=>

	alone or in combination, is unlikely to significantly impact on the conservation objectives.
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2.5. Conclusion

- 2.5.1 This report has considered the potential impact that the emerging Tonbridge and Malling Local Plan could have on European sites as part of the screening stage of the Habitats Regulations Assessment (HRA). In doing so it has taken into consideration the information available on the nature of the sites and reasons for their respective designations, whilst having regard to the precautionary principle and the in combination effects with other plans.
- 2.5.2 Through this screening process, we have been able to determine that there would be no likely significant effects of the emerging Local Plan on the conservation objectives of any of the protected sites either within the borough or in close proximity to it. Therefore an Appropriate Assessment is not required.

APPENDIX 1



Legend

- Special Area of Conservation
- Special Protection Area
- Ramsar
- 7km buffer
- Tonbridge & Malling District

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Agenda Item 5

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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Agenda Item 6

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

**ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT
INFORMATION**

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Agenda Item 7

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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