

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).

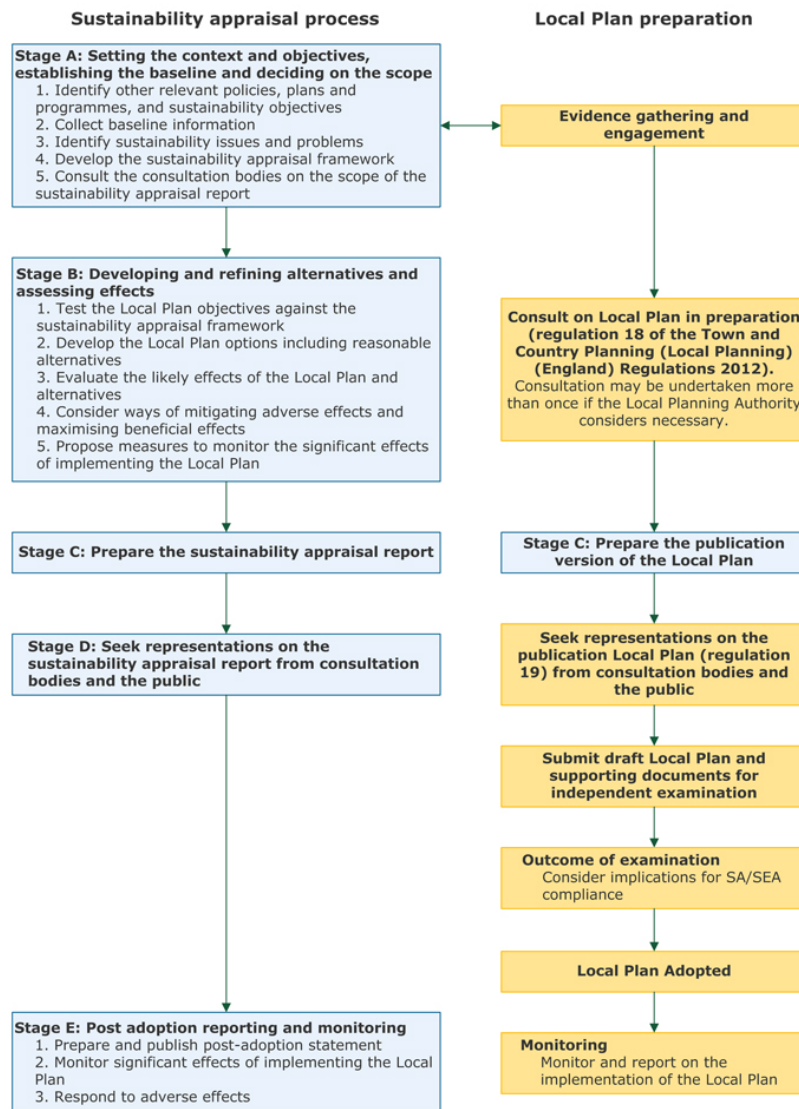
⁵ These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

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

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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

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				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

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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

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				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

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				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

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				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

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				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.

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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

	Assessment			
SA Objectives	Short	Medium	Long	Comments
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 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 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

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				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			

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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.

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

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				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>			