

Hearing Statement: Matter 1; Issue 2 (Sustainability Appraisal Addendum)

Q3. Have the suggested Main Modifications been subject to Sustainability Appraisal?

Whilst the modifications have been subject to Sustainability Appraisal (SA) (ref: Sustainability Appraisal of the Submission Local Plan; Post Examination Addendum Part 1 - Development Strategy and Strategic Sites), the findings in relation to allocation AL/HA5 (Land North of Birchfield Grove, Hawkhurst) are inaccurate. The SA currently states that all Parameters for new Development Strategy Options (namely Options 12, 14, 15, 16, 17, 18, 19A, 19B) involve AL/HA5 (* plus 70 new dwellings in Hawkhurst*), and that the impact on biodiversity will be neutral (as per Table 26). This is not the case.

The site allocation AL/HA5 comprises wood pasture and parkland (a priority habitat under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006). Within Biodiversity Net Gain (BNG), wood pasture and parkland is classified as a Very High Distinctiveness Habitat (VHDH). As per the Statutory Biodiversity Metric User Guide (Defra, 2024) VHDH ‘are highly threatened, internationally scarce habitats which require conservation action, and impacts to these habitats should be avoided in line with planning policy’.

Wood pasture and parkland habitat was not identified as part of the 22/02664/HYBRID planning application. Natural England (NE) confirmed that the site constitutes wood pasture and parkland habitat in November 2023, and this correspondence was passed to TWBC ahead of the planning committee meeting. NE stated they will be including Birchfield Grove on their priority habitat inventory.

The current unmitigated loss of priority habitat at Birchfield Grove will have a negative or very negative impact on biodiversity. As this represents a fall of at least two increments in harm (i.e. neutral to negative/very negative, as per Figure 2 below), should the SA not re-assess all site options involving allocation AL/HA5?

Unknown or Mixed	Very Negative	Negative	Slightly Negative	Neutral	Slightly Positive	Positive	Very Positive
?	---	--	-	0	+	++	+++

Figure 2. Eight-point scale of impact used to determine Sustainability Appraisal scores.

The role of the SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

As all Parameters for new Development Strategy Options include *70 new dwellings in Hawkhurst (AL/HA5) and no mitigation/compensation has been proposed to mitigate the significant adverse effect of loss of priority habitat, do all modified options not fail to deliver on biodiversity/environmental objectives of the SA?