

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 1: Legal Compliance Issue 3: Sustainability Appraisal

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Matter 1 – Legal Compliance

Issue 3 – Sustainability Appraisal

Sustainability Appraisal Background

1. In accordance with paragraph 001 of the PPG for SEA and SA (See [Reference ID: 11-001-20190722](#)) the role of the Sustainability Appraisal (SA) is to “*assess the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives*”.
2. SA is an iterative process that underpins all stages of plan making. Accordingly, a SA report has been produced to accompany all stages of plan-making: from Issues and Options [[CD 3.7b](#)], to Draft Local Plan [[CD 3.11](#)], Pre Submission Local Plan [[CD 3.62](#)] and finally, for the Submission Local Plan [[CD 3.130a](#)].
3. As the plan-making process began, baseline data was collected alongside a full review of legislation and policy to inform the development of both SA objectives and a robust methodology to test whether these objectives were being achieved. This stage is summarised as a Scoping Report [[CD 3.5](#)]. This methodology was applied to each stage of plan-making, testing both proposed policies and reasonable alternatives, and informing the development of the final Plan. This is in line with paragraph 022 of the PPG for SEA and SA (See [Reference ID: 11-022-20140306](#)), which states: “*The sustainability appraisal report should help to integrate different areas of evidence and to demonstrate why the proposals in the plan are the most appropriate*”.
4. Throughout this document and unless stated otherwise, all considerations of the SA refer to the Submission version report [[CD 3.130a](#)]. This report provided an update to the Pre-Submission SA to account for the inclusion of newly submitted sites and changing arising from the Reg 19 responses.

Inspector's Question 1: [re. Growth Strategy 11 assessment]

Option 11 in the Sustainability Appraisal of the Local Plan (Version for Submission) tests a growth strategy which includes an additional 1,900 dwellings (equivalent to the need identified by Sevenoaks District Council in April 2019). What were the outcomes of this assessment and how did they inform the preparation of the Plan?

TWBC response to Question 1

5. The parameters used to define Growth Strategy Option 11 ("Uncapped Need +") are summarised in Table 12 on page 52 of the Submission Local Plan SA [[CD 3.130a](#)], and the outcomes of the Sustainability Appraisal are summarised in Table 23 on page 76 of the Submission Local Plan SA [[CD 3.130a](#)].
6. In general terms, this option is expected to result in substantial harm to the sensitive landscapes both from individual developments and cumulatively, with the Landscape objective scoring very negatively. Additionally, the Air Quality, Climate Change, Heritage, Land Use (including loss of greenfield land, soils, and green belt), Noise and Travel objectives all scored negativity to varying degrees with Land Use scoring particularly poorly.
7. Paragraph 6.2.7 of the SA explains that "*the sustainability appraisal process recognises the interdependence of the three strands of sustainable development and the weight given nationally to the most highly affected environmental objectives*".
8. In combination with the findings from the SAs of the other Growth Options, which are described in both the SA report [[CD 3.130a](#)] on pages 79 – 81 and the Development Strategy Topic paper [[CD 3.64](#)] on pages 22 - 25, the SA then continued in paragraph 6.2.7 to recommend that "*growth strategies 10, 11 and 12 were not pursued further*" and that the preferred growth strategy for the Local Plan should meet no more than the standard method housing need.
9. In summary, the outcome of this assessment process informed and guided the Council's decisions on the most appropriate overall growth strategy to take forward. It did this by assessing alternative strategies against sustainability objectives and thus providing a dispassionate perspective of what growth strategy would best meet the

primary purpose of sustainable development in line with paragraphs 7 and 8 of the NPPF.

10. Alongside this recommendation, the Local Plan process continued to test sites and gain knowledge from the SA findings and the site assessments. In combination, this process allowed the potential capacity for new settlements to accommodate growth to be determined, and thus provided useful information on how potential new strategies could be achieved.
11. At all stages of Local Plan development, the SA process contributed significantly to the decision-making process in relation to the overall strategy, the local area strategies and the choice of individual sites. The Local Plan was revised to take into account the SA findings as is required and explained within Paragraph 018 of the [PPG for SEA and SA](#).
12. Specifically in terms of considering the unmet housing need at Sevenoaks District Council identified firstly in April 2019, it should be appreciated that a Growth Strategy option that embraced an unmet need of 1,900 dwellings was considered in the preparation of the Draft Local Plan and is identified accordingly in the Draft Local Plan Sustainability Appraisal [\[CD 3.11\]](#). At the time, this was known as Growth Strategy 7, and it can be seen in Table 12 on page 36. The assessment, in Table 14 (pages 39/40) found that there would be very negative impacts on Landscape and Land Use objectives, as well as negative scores in respect of Climate Change and Heritage. Hence, it was concluded that the strategy was highly unlikely to represent sustainable development.
13. This information informed the strategy of the Draft Local Plan [\[CD 3.9\]](#), which was published for consultation purposes under Regulation 18, alongside the supporting SA, in Autumn 2019.
14. Consideration was given to comments on the Regulation 18 consultation, as summarised in the respective Consultation Statement [\[CD 3.69\]](#), which includes a summary of comments on the Draft Local Plan SA at Section 8. The main concerns were about the overall scale of growth, as well as the distribution, with SA concerns about whether the economic and social needs were being prioritised over environmental issues. There were also several calls for further alternatives to the growth strategy to be appraised.

15. This feedback, together with further evidence work that followed the Regulation 18 consultation, all fed into a further SA analysis that was undertaken to inform the Pre-Submission Local Plan [\[CD 3.62\]](#). This is essentially that published at Submission stage (subject to amendments to take account of additional sites). Overall, it is considered to have been a robust process.

Inspector's Question 2: [re. basis and justification for Option 11]

Does Option 11 test the minimum housing requirement plus 1,900 dwellings to help meet unmet needs from elsewhere, or an alternative, higher figure? What is the justification for this?

TWBC response to Question 2

16. The parameters used to define Growth Strategy Option 11 are summarised in Table 12 on page 52 of the Submission Local Plan SA [[CD 3.130a](#)]. It can be seen that, whereas Growth Strategy Options 3 – 9 used the Standard Method figure of 678 dwellings per year, this option took the higher, uncapped figure of 741 dwellings per year (which is tested separately in Growth Strategy 10) and added to it the unmet need of Sevenoaks District Council of 1,900 dwellings.
17. As explained by paragraph 018 of the PPG for SEA and SA (see [Reference ID: 11-018-20140306](#)) reasonable alternatives to test different scales of development need to be *sufficiently distinct*. To do this, the SA tested the scales shown in Table 1 below.

Table 1. Scale of development for Growth Strategy options.

Growth Strategy Option	Scale of Development (dwellings per year)	Percentage difference*
1	346	-49%
2	560	-17%
3 – 9	678	n/a
10	741	+9%
11	847	+25%

* The percentages show the differences from the Standard Method figure (April 2020) of 678 dwellings per year

18. If a further Growth Strategy Option was tested that considered the capped housing need of 678 dwellings per year plus unmet needs from elsewhere, it would give an overall scale of development of 784 dwellings per year. This would give a Growth Strategy Option that is only 5.6% different from Option 10, which was felt not to be sufficiently distinct. Using the uncapped housing need instead produced a bigger difference

between options and therefore a more suitable range of Growth Strategy Options to test.

19. Moreover, it was felt to be appropriate to test the potential to meet the uncapped local housing needs of the borough itself prior to looking at whether there was additional capacity to meet the housing needs of other local authorities. Using the capped housing need figure, instead of the uncapped, would have essentially meant that the needs of other local authorities were being met ahead of the full housing needs of the borough.
20. This approach is supported by paragraph 002 of the PPG for Housing and Economic Needs Assessment (see [Reference ID: 2a-002-20190220](#)) which confirms the NPPF position of expecting strategic policy-making authorities to follow the standard method for assessing local housing need, and then goes on at paragraph 007 to state that: *“Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered”* (Reference ID: 2a-007-20190220). Hence, it is appropriate for the SA to assess the potential to meet the uncapped “local housing need” in the first instance.
21. Of course, the PPG subsequently sets out circumstances where a higher housing need figure than the standard method should be used at Paragraph: 010 Reference ID: 2a-010-20201216. It states that this may be appropriate but not limited to:
 - where there is a particular requirement in place to promote and facilitate additional growth (e.g. Housing Deals)
 - where strategic infrastructure improvements are likely to drive an increase in the homes needed locally; or
 - where unmet need from a neighbouring authority can be met
22. The first two of these scenarios do not apply, but the outstanding request from Sevenoaks District Council to help accommodate an unmet need of 1,900 dwellings, was appropriate to test.
23. Options with even higher housing figures were not tested because the assessments of Options 10 and 11 showed increasingly harmful environmental sustainability results.

Inspector's Question 3: [re. testing of unmet housing needs option]

Does the Sustainability Appraisal adequately and robustly test a strategy that would contribute towards meeting previously identified unmet housing needs from Sevenoaks?

TWBC response to Question 3

24. In terms of the level of unmet housing need in Sevenoaks, the Sevenoaks District Council Pre-Submission (Regulation 19) Local Plan, which first became public in November 2018, identified a shortfall against the local housing need of approximately 1,900 dwellings, with a request to help meet this need following in April 2019.
25. This Council was therefore able to consider this potential unmet housing need in the preparation of its own Draft (Regulation 18) Local Plan, which was published in September 2019 [\[CD 3.9\]](#), and similar due consideration was made as part of the SA process – see the SA report supporting the Draft Local Plan [\[CD 3.11\]](#).
26. To test this strategy, the SA supporting the Draft Local Plan developed a Growth Strategy Option that allowed for an extra 1,900 new dwellings to be built in the borough: Growth Strategy 11.
27. The parameters considered when undertaking the assessment for Growth Strategy Option 11 are included in Table 12 on page 52 and are summarised as follows:
 - Inclusion of both strategic sites
 - Distribution as per Growth Strategy Option 9 (“Dispersed Countryside”)
 - Likely further development in the AONB (relative to Option 9)
 - Loss of more Green Belt (relative to Option 3)
28. As for all Growth Strategy Options, testing of this strategy followed the methodology outlined in Section 4.3 of the SA and was guided by the decision-aiding questions presented in Appendix B [\[CD 3.130a\]](#).
29. The outcome of this assessment process is summarised in the response to [Question 1](#).

Inspector's Question 4: [re. consideration of High Weald AONB]

Has the Council, through the Sustainability Appraisal, considered alternative strategies which avoid major development in the High Weald AONB altogether?

TWBC response to Question 4

30. Yes. Growth Strategy Option 2 considered a strategy that does not involve any major development in the High Weald AONB.
31. The strategy was developed following advice from consultees at the Reg 18 Draft Local Plan stage and was used as part of the process to move the Local Plan forward to Reg 19 stage. This Growth Strategy Option was therefore considered as an alternative to the Draft Local Plan Growth Strategy and consistent with the requirement to continue refining broad options down until a sustainable approach could be recommended.
32. The parameters considered when undertaking the assessment are included in Table 12 on page 48 [[CD 3.130a](#)] and are summarised as follows:
- Housing supply of 560 dwellings per year, by the removal or reduction in scale of all previously proposed major residential sites within the AONB
 - Inclusion of Strategic Sites (which are beyond the AONB)
 - Removal of large employment areas (most notably that at Longfield Road, RTW)
 - Remaining distribution as per Growth Strategy Option 3 (the Draft Local Plan)
 - An assumption that sites would be kept small scale
33. To determine what the reduced housing need would be, all major residential development sites in the Local Plan that were located in the AONB were reduced to a proxy of 40 dwellings per site to give a total reduction of 1,600 dwellings. An upper limit of 2,000 dwellings (17% of total housing need) was then applied to allow for the subjectively in determining whether sites should be defined as major or non-major, or indeed removed entirely. This allowed for a range of 1,600 – 2,000 dwellings to be removed from the housing need and created a new housing need of 560 dwellings per year.

34. The outcome of this assessment is described in Table 14 on page 56 and paragraph 6.2.5 on the SA [[CD 3.130a](#)]. In conclusion, Growth Strategy Option 2 allowed for improvements in the scores for environmental objectives of Air Quality, Biodiversity, Heritage, Land Use, Landscape and Noise as pressure on land-take eased. However, a deterioration was seen in the economic and social objectives of Business, Employment, Deprivation and Housing which detracted from the benefits.
35. When comparing the outcome of the assessment for Growth Strategy 2 with the assessment for the Pre-Submission Local Plan (Growth Strategy 13), it can be seen that Growth Strategy Option 13, which meets the standard housing need, includes the strategic sites with greater urban intensification and reduced rural and AONB development (compared to the Draft Local Plan distribution), produces both more positive scores overall, stronger positive scores and less extreme negative scores. See [Appendix 1](#) for an overview of the scores for all Strategic Growth Options which can also be found as Table 26 on page 84 of the SA [[CD 3.130a](#)].
36. Finally, it is also note-worthy that Growth Strategy Option 8 (“Services and AONB”) was developed as a further strategy that considered a reduced number of dwellings in the AONB. This strategy was defined as one in which the standard housing need was met but with approximately 25% less dwellings in the AONB.

Inspector's Question 5: [re. consideration of Green Belt]

Has the Council, through the Sustainability Appraisal, considered alternative strategies which avoid releasing land from the Green Belt?

TWBC response to Question 5

37. Yes. Two Growth Strategy Options assess the impact of avoiding the release of land from the Green Belt: Growth Strategy Option 1 and Growth Strategy Option 6. Both were assessed for the Pre Submission SA Report [[CD 3.62](#)] and carried forward into Table 12 of the Submission SA Report [[CD 3.130a](#)].

Growth Strategy Option 1

38. This option avoids release of Green Belt by reducing development below the local housing need of 678 dwellings per year. The parameters applied when undertaking this assessment are included in Table 12 on page 47/48 of the Submission SA Report [[CD 3.130a](#)] and can be summarised as follows:

- Tudeley Village (wholly in the Green Belt) is excluded entirely
- Reduction in the scale of the Paddock Wood extension to no longer include the western parcels (being within the Green Belt)
- Removal of all other Green Belt sites around Pembury and Royal Tunbridge Wells
- A resulting housing supply of 346 dwellings per year
- Removal of large employment areas
- Remaining distribution as per Growth Strategy Option 3 (the Draft Local Plan)
- Assumption that there was no potential for redistributing the development outside of the borough – this option was assessed separately (see [Question 3](#)).

39. The outcome of this assessment is described in Table 13 on page 54 and paragraph 6.2.5. Similar to Growth Strategy Option 2 (see [Question 4](#)), Growth Strategy Option 1 allowed for improvements in the environmental objectives, but a deterioration was seen in economic and social objectives. Specifically, Air Quality, Biodiversity, Heritage, Land Use, Landscape and Noise scores were improved as pressure on land take eased. However, the objectives of Business, Employment, Deprivation and Housing worsened.

Growth Strategy Option 6

40. This option maintains development at the housing need, such that it tests the exclusion of all Green Belt sites by commensurate increases elsewhere. The parameters applied when undertaking the assessment are included in Table 12 on page 50 of the Submission SA Report [[CD 3.130a](#)] and are summarised as follows:

- Alteration to the Strategic Sites at Paddock Wood such that the western parcels are excluded and growth is instead focused on the south east of the town.
- Exclusion of Tudeley Village
- Major growth outside of the AONB at the smaller villages of Horsmonden, Sissinghurst and Frittenden
- Growth of other settlements in the AONB in line with Growth Strategy Option 8
- A resulting housing supply of 678 dwellings per year i.e. the existing capped need
- Remaining distribution as per Growth Strategy 8 (i.e. growth of AONB settlements in line with service provision)

41. The outcome of this assessment is described in Table 18 on page 65 and paragraph 6.2.11. In summary, it was found that meeting the housing needs whilst avoiding Green Belt release caused the following impacts:

- Highly negative impacts for the Travel objective as growth is directed instead to small settlements with poor opportunities for active travel and public transport provision
- Highly negative impacts for the Climate Change objective reflecting an increase in transport-related carbon and the potential loss of a solar farm south-east of Paddock Wood
- Less positive impacts for the Housing objective as the strategy is less effective at addressing the housing needs in the west of the borough
- Less positive impacts for the Education objective as the distribution does not benefit the existing needs of populations in Royal Tunbridge Wells or help address needs in some of the smaller settlements

- Less positive impacts for the Equality objective reflecting the need to develop more intensely in rural areas with existing access problems.

Conclusion

42. In Growth Strategy Options 1 and 6, the SA has considered avoiding Green Belt removal by reducing and redistributing the standard method housing figure respectively. The findings from both of these assessments, the summaries of which are reproduced in [Appendix 1](#), show that there is not a sustainable option that simultaneously meets housing needs and avoids releasing of land from the Green Belt.
43. Regard should also be had to the site options considered elsewhere in the SA which provided useful information on the individual merits of each site that is currently in the Green Belt.

Inspector's Question 6: [re. consideration of alternative distributions]

Does the Sustainability Appraisal adequately and robustly consider alternative distributions of development, such as focusing growth towards existing settlements such as Royal Tunbridge Wells, rather than relying on a new settlement?

TWBC response to Question 6

44. Yes. The SA considers five different distributions of development for the Standard Method local housing need figure of 678 dwellings per year that do not rely on a new settlement at Tudeley. These are described in Table 12 on pages 48 - 51 of the SA [[CD 3.130a](#)] and the Distribution of Development Topic Paper [[CD 3.126](#)].
45. Of these five growth strategies options, three also did not include strategic growth at Paddock Wood which, for the purposes of answering this question, will also be thought of as a new form of settlement because it will transform the existing town (albeit addressed more in [Question 9](#)).
46. The five strategies are summarised in Table 2 below.

Table 2. Development distribution options considered by the SA

Growth Strategy Option	Description
4 Main towns	Growth centred on main towns and A21 corridor. Higher levels of growth at RTW, Hawkhurst and Cranbrook. No new settlement at Tudeley. Strategic growth at Paddock Wood.
5 Main towns and large villages	Growth centred on main towns and larger villages. Higher levels of growth at RTW, Cranbrook, Hawkhurst, Pembury, Rusthall and further villages Large growth at Paddock Wood. No strategic sites.
6 Meet need with no MGB loss	Growth to meet housing need focused on settlements outside of the green belt (Frittenden, Horsmonden and Sissinghurst). No new settlement at Tudeley. Major growth of Paddock Wood.
7 Proportional to services	Growth based on the availability of settlement services and facilities. No strategic sites.

Growth Strategy Option	Description
8 Services and AONB	Growth based on the availability of settlement services and facilities as per Growth Strategy Option 7 but reduced where settlements are within the AONB. No strategic sites.

47. The outcome from these assessments are shown in [Appendix 1](#) and are described in detail in paragraphs 6.2.11 – 6.2.15 on pages 80-81 of the SA [[CD 3.130a](#)]. The SA explains that including the strategic sites brings about stronger positive scores as a result of the beneficial master-planning approach which will support a more sustainable form of development.
48. It is also noted that the higher levels of growth that are directed to RTW in Growth Strategy Options 4 and 5 worsened the scores for the Air Quality, Heritage and Noise objectives.
49. This outcome is in line with the findings from SA at Issues and Options stage in which the principle of a new settlement was supported in general [[CD 3.7b](#)].
50. In conclusion, a number of different options for distributions without a new settlement at Tudeley Village were considered ranging from very urban to very rural and recognising the importance of the Green Belt. This includes Growth Strategy 1 which considered an option with no Green Belt loss but less development overall (see [Question 5](#)).

Inspector's Question 7: [re. reasonable alternatives to new settlement at Tudeley]

Having established the strategy, what reasonable alternatives has the Council considered through the Sustainability Appraisal to the new settlement proposed at Tudeley?

TWBC response to Question 7

52. A total of 14 different locations for large strategic growth were reviewed by the SA, ranging from stand-alone sites to sites adjoining existing settlements. The locations were as follows:

- Blantyre House (former prison), Goudhurst parish
- Land in Capel centred at Tudeley
- Frittenden
- Horsmonden
- Iden Green
- Kippings Cross, East of Pembury and adjacent to the northern and southern carriageways of the A21
- Land adjacent to Colliers Green Primary School
- Land at Great Bayhall, east of Royal Tunbridge Wells
- Land between Cranbrook and Sissinghurst
- Langton Green, adjoining the western edge of the existing development
- Land in Paddock Wood and Capel, centred on Paddock Wood town
- Walkhurst Farm, Benenden
- Castle Hill

53. A detailed explanation of the consideration of alternatives is provided in the SA in paragraphs 6.2.21 – 6.2.29 on pages 90 and 91 and in Table 27 on pages 86 – 90 [[CD 3.130a](#)]. The filtering process used for small scale development detailed in Section 8.1 (see [Question 10](#)) was applied in the same way for the above 14 sites considered for strategic growth.

54. In summary, of the 14 locations considered, only two were considered to be worthy of pursuing (Tudeley and Paddock Wood). The reasons for ruling-out the other twelve sites largely revolved around unacceptable harm caused to the High Weald AONB and

poor transport connections particularly for active transport modes. Paddock Wood and Capel were also favoured because of the potential to generate improvements to existing flood risks.

55. The SA states that where risk to the AONB was identified, consideration was given to the fact that, *“while AONB designation does not of itself rule out ‘major’ growth, this should still be exceptional and, overall, the NPPF sets out that the scale and extent of development in AONBs should be ‘limited’ (paragraph 172). Indeed, the PPG further states that policies for protecting AONBs may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas”* (Paragraph: 041 Reference ID: 8-041-20190721).
56. The SA goes on, in paragraphs 6.2.25-6.2.27, to state that the High Weald Management Plan describes the landscape as ‘small-scale’ and with a dispersed settlement pattern and scenic beauty created by large tracks of open land. None of the sites considered by the SA for strategic growth in the AONB were able to protect this highly weighted and sensitive environmental feature.
57. The site at Castle Hill was submitted as a potential Garden Settlement location at a later stage in the assessment process. However, as the site fell within the AONB, with severe landscape impacts, as well as ancient woodland constraints, and so was not felt to be a reasonable alternative. This finding was used to inform the SHEELA [\[CD 3.77e\]](#).

Inspector's Question 8: [re. transport justification for ruling out alternative settlements]

Q8. What was the justification for ruling out alternative options in locations such as Frittenden and Horsmonden on transport grounds, but not Tudeley Village?

TWBC response to Question 8

58. The villages of Horsmonden, Frittenden and the location of Blantyre House were considered as alternative options for a potential new settlement but largely ruled out on transport grounds.
59. An explanation for why these locations were not assessed further is contained in Table 27 on pages 86-90 of the SA [[CD 3.130a](#)]. A further summary and illustration of the transport options available for each of these locations is compared alongside Tudeley Village in [Appendix 2](#).
60. As can be seen from [Appendix 2](#), the distances to the main towns where residents are more likely to access day-to-day needs, secondary education and employment are approximately three times greater for the sites that were ruled out, compared with Tudeley. It is also noteworthy that the nearest main settlement to Tudeley is a large town whereas the nearest main settlements to the ruled-out sites were smaller and thus equipped with fewer services and facilities thus prompting more journeys further afield.
61. Furthermore, the road links to main settlements from Tudeley are more substantial and have the potential to be improved to allow for use by pedestrians and cyclists and viable public transport services, whereas the road links from the ruled-out sites were more rural and with less flexibility for improvement. These points demonstrate why the ruled-out sites were not felt to be suitable alternatives for further assessment.
62. Finally, the safeguarding of the A228 Colts Hill bypass in the locality of Tudeley Village, a strategic route that will ensure traffic flows across the county, will bring benefits that cannot be realised at the other locations.

Inspector's Question 9: [re. size and scale of development at Tudeley Village/Paddock Wood]

Does the Sustainability Appraisal adequately and robustly consider reasonable alternative strategies for the size and scale of development proposed at Tudeley Village and Paddock Wood, including land at East Capel? For example, does it consider smaller and/or larger forms of development as a way of meeting housing needs?

TWBC response to Question 9

Tudeley Village

63. Three alternative options for the scale and extent of Tudeley Village are considered on pages 91-96 of the SA and illustrated in Figure 6 [\[CD 3.130a\]](#). See [Appendix 3](#).
64. Option 1 was a smaller development of approximately 1,500 dwellings south of the railway line; this lower limit being the minimum advocated size for a garden settlement in 2016 by the Government prospectus for [Locally-Led Garden Villages, Towns and Cities](#). Option 2 was for a maximum of 2,800 dwellings straddling the railway line. Option 3 was for a larger settlement of approximately 5,000 dwellings following a similar pattern but with extensions outwards – the majority of which were south of the railway where land was submitted.
65. A fourth option similar in size to Option 1 but instead located north of the railway line was considered but discounted as a reasonable alternative, as it was felt to be unviable from an accessibility standpoint.
66. The outcome of these assessments is presented in Table 28 and paragraph 6.2.35 of the submitted SA [\[CD 3.130a\]](#).
67. In summary, environmental protection was found to conflict with economic and social benefits for all options, with negative impacts being lessened by developing a garden settlement at a smaller scale. Specifically, the Noise, Landscape, Land use, Climate Change and Biodiversity Objective scores were found to deteriorate as the scale of the settlement increased (particularly from Option 2 to Option 3). This reflected harmful environmental aspects such as encroachment into the AONB, coalescence, risk to wildlife constraints in the south and increase in energy demand. Full details are provided in Table 28.

68. The more severe impacts identified for Option 3, called into question the suitability of this option. However, the SA report also noted that the downside of Option 1 was that fewer contributions would be available for improvements in flood risk elsewhere, reflected in the scores for the Water objective which improve as the scale increases from Option 1 to 2. For these reasons, Option 2 was favoured.

Paddock Wood (and Land in East Capel)

69. Five alternative options for the size and scale of the Paddock Wood town urban extension were identified. These are illustrated in Figure 7 of the SA [\[CD 3.130a\]](#) and [Appendix 4](#), and further summarised in Table 3 below.

Table 3. Comparison of reasonable alternatives for extension of Paddock Wood town.

Option	Number of dwellings*	Location of development
1	1,500	No land take in Green Belt and avoidance of flood zone 3. Limited by borough boundary.
2	3,500	As for Option 1 but with development westwards into the Green Belt to allow for flood relief work in the town.
3	2,500	As for Option 1 but with greater development southwards avoiding the areas of Green Belt, AONB, flood risk and ancient woodland.
4	4,500	As for Option 1 but with greater development both westwards and southwards to double the size of the existing town.
5	2,500	As for Option 1 but with greater development eastwards into land avoiding the areas of Green Belt, AONB, flood risk and ancient woodland.

* excluding 1,000 dwellings from existing SALP sites

70. The outcomes of these assessments are detailed in Table 29 and paragraph 6.2.46 of the submitted SA [\[CD 3.130a\]](#). It can be seen that the objectives are influenced by both the scale and distribution of development. For example, larger scales of development bring more positive scores for the Business Growth objective reflecting support from new customers and provision of new business space. Whereas smaller development tended to bring improvements in environmental objectives such as Climate Change, Heritage, Land Use, Landscape and Noise, largely reflecting reduced land take.

71. The distribution patterns influenced the scores such that extending the development to the south and east created more negative scores for the Equality and Services objectives as the more piecemeal development in these extensions negatively affected access to central facilities.
72. In summary, adverse environmental impacts are avoided by development at a scale similar to Options 1 or 2. Whilst Option 1 scores slightly more positively, it is noted that the housing objective is not differentiated across the options due to the substantial gains for all options and that the channel realignment needed to improve flood risk on the land in the west of Paddock Wood cannot be implemented in Option 1. For these reasons, Option 2 was favoured.

Inspector's Question 10: [re. determination of reasonable alternative sites]

Where individual sites are concerned, how did the Sustainability Appraisal determine what were reasonable alternatives?

TWBC response to Question 10

73. To determine which sites should be assessed as reasonable alternatives, the submission version of the SA [[CD 3.130a](#)] explains that a filtering process was used during a first stage initial assessment of sites at Section 8.1.
74. Paragraphs 8.1.1 and 8.1.2 of the SA set out the background and methodology that provide the context for the SA report and are followed at paragraph 8.1.3 with a definitive list of the specific types of sites filtered out at the first stage initial assessment. The filtering process was an on-going iterative process with sites reassessed as work progressed and involved consideration of the following categories:
- Sites that were in remote locations or not well related to settlements
 - Sites with environmental constraints such as highly sensitive landscape, biodiversity or heritage features
 - Sites with geographical constraints such as topography or being beyond the borough boundary
 - Sites that were too small to provide a meaningful contribution to housing supply
 - Sites that had already received planning permission and for which construction was well underway.
75. Sites that did not meet the criteria above were considered to be worthy of further assessment taking into account of the objectives and geographical scope of the plan in line with the PPG for SEA and SA (see [Paragraph: 019 Reference ID: 11-019-20140306](#)).

Inspector's Question 11: [re. SA Scoring]

Are the scores and conclusions reached in the Sustainability Appraisal reasonable, sufficiently accurate and robust to inform the submission version of the Local Plan?

TWBC response to Question 11

76. The conclusions drawn within the SA were determined by the application of a methodical and rigorous scoring process that was carefully tailored for each of the 19 SA objectives. The 19 objectives were considered and approved for use by the three Statutory Environmental Bodies at SA Scoping Stage, and the foundation upon which the objectives were based (baseline data and review of plans, policies and programmes) was kept up to date during the 5-year period of Local Plan development and adjusted appropriately as detailed in Table 7 of the SA [\[CD 3.130a\]](#).
77. The scoring system was developed with a wide choice of impact scales that could be applied to each of the 19 objectives, ranging from very negative to very positive, neutral or unknown/mixed. This ensured a more nuanced (and thus useful) scoring system than in previous SAs of development plans.
78. The method used to determine the scores was guided by numerous decision-aiding questions and a robust process that ensured overall scores were determined fairly if there was variation in the scores applied to the various decision-aiding questions (see para 4.3.5 on page 37 of the SA [\[CD 3.130a\]](#)). On top of this, a weighting system was applied to the decision-aiding questions to ensure that more important issues such as those that were legislatively driven, of critical importance to the borough and/or concerning finite resources, could be assigned a higher weighting.
79. At all times, the scoring system paid careful regard to the following impact criteria presented within Schedule 2 of the SEA Regulations:
- Likelihood of impact (high, medium or low)
 - Scale of impact (local, regional, national or global)
 - Permanence of impact (temporary or permanent)
 - Effect of impact (secondary, cumulative or synergistic)

80. Commentaries on scoring were applied to all Local Plan policies and were especially useful when the ability to predict scores became more challenging for example due to the high-level nature of alternatives being considered or due to the difficulty in predicting the future baseline.
81. In all cases, professional judgement and the unique circumstances of each policy were used to assign final scores. After the SA report was made available for consultation in Autumn 2019 and Spring 2021, appropriate adjustments were made to scores in response to comments received (see Consultation Statement part 2 page 227 [\[CD 3.69\]](#) and SA Table of Minor Modifications [\[CD 3.130b\]](#)). However, every effort was made to apply scores fairly, consistently and accurately.
82. It is recognised that representors may take the view that scoring given to a site in respect of certain sustainability objectives should have been different. However, the appraisal process is not a precise science and will always encompass differences of professional opinion on individual points. Such differences do not mean that the appraisal is flawed.

Inspector's Question 12: [re. alternative employment land/buildings strategies and sites]

What alternative strategies and/or site allocations does the Sustainability Appraisal consider for the provision of new employment land and buildings?

TWBC response to Question 12

83. Alternative approaches to the provision of, and potential for, new employment land and buildings are essentially considered as an integral part of the various growth strategies assessed in Table 12 on page 48 of the SA [[CD 3.130a](#)].
84. Additionally, it can be seen that the sustainability objectives, against which alternative strategies are assessed, include both an 'Employment' objective and a 'Business' objective. Scoring against these objectives used decision-aiding questions, as set out in Appendix B of the SA, as follows:
- Employment objective – consideration of whether employment opportunities would be improved in key wards
 - Business objective – consideration of whether there would be support for existing business or growth of new business, whether support was available for specific business sectors identified, whether loss of economic floorspace was prevented in Key Employment Areas, and finally whether support was available for the rural economy.
85. Hence, the strengths and weaknesses of different strategies in employment terms could be assessed. It was found that lower levels of growth and highly dispersed growth were not compatible with the Employment objective while, conversely a focus on the main towns was most positive. Similar conclusions were drawn in respect of the Business objective.
86. It should be appreciated that the SA drew on available evidence at each stage. Of particular note was the Sevenoaks and Tunbridge Wells Economic Needs Assessment, 2016 [[CD 3.25](#) (also [CD 3.87](#))]. This highlighted the demand for supply in areas close to main arterial roads, public transport nodes or with ample car parking, and highlighted areas alongside those with an existing critical mass of employment uses. It also confirmed that the *"A21 is a continued focus for transport investment with significant*

growth potential, and the identification and allocation of new sites in this area has the potential to significantly improve the choice of sites to the market while providing the flexibility to respond to occupier and investor needs across employment sectors.” (see Executive Summary). Also, as set out at paragraph 16 of that report:

“16. Colliers consider there to be potential for the expansion of a number of Key Employment Areas, with suitable land adjacent to Longfield Road/North Farm, Maidstone Road (Paddock Wood) and Gills Green having the potential to address the identified shortfall while creating a balanced portfolio of employment land. It would also help to support the creation of new employment opportunities alongside the provision of new housing, helping to reduce out-commuting from the borough over time.”

87. Following site assessment work, several employment allocations were put forward in the Draft Local Plan [[CD 3.9](#)], with the impact of including or excluding these under different options considered as part of the SA. For example, Growth Strategy Options 1 and 2 remove the option for employment allocations in RTW and Hawkhurst.
88. Also in relation to sites, it is noted that all sites submitted for employment use were assessed as part of the SHELAA process, with reasonable alternatives also considered through the SA, including land surrounding Tunbridge Wells Hospital, Pembury, SanTERS Yard, Gills Green Farm and an amalgamation of sites at Cranbrook – as identified in the respective settlement sheets.
89. The approach for the strategic sites was somewhat different, with employment land similarly considered within the context of overall growth, but with separate work through the Strategic Sites Working Group.
90. For completeness, attention is also drawn to the SA of Economic Development policies in Section 6 of the Submission Local Plan [[CD 3.128](#)], including in relation to key employment areas, the retention of existing sites and buildings, and rural sites and buildings.
91. In summary, due consideration was given to the employment provision as part of the SA process, as part of the consideration of reasonable alternatives for both spatial strategies and sites.

Appendices

Appendix 1: Overview of scores for the Strategic Growth Options

Sustainability Objective	1 No MGB	2 No AONB Majors	3 DLP	4 Main Town	5 Main Town/ Large Villages	6 Meet need no MGB loss	7 Propor- tional to services	8 Services & AONB	9 Dispersed Country- side	10 Uncapped	11 Un- capped & Unmet	12 No Plan	13 PSLP
Air	++	+	0/-	--	-/-	0	0	0/+	--	-	-/-	--	0/-
Biodiversity	0/+	+	0	0	0	0/-	0	0/+	-	0/-	-	--	0
Business	--	--	++	+/++	+	0/+	+	+	--	+/++	++	?	++
Climate	0/-	-/-	-/-	-	--	--/-	--	--	--	--/-	---	---	-
Deprivation	0/-	0	++	+/++ +	++	0/+	+	+	+	+/++	++	--	++
Education	++	++	++	+	+/++	+	++	++	++	+/++ +	+++	---	++
Employment	--	--	++ +	+/++ +	++	+	+	0/+	--	+/++	++	?	+++
Equality	0/+	+/+ +	++	+	+/++	+	++	++	-	+/++	++	?	++
Health	0/-	0	++	+/++	+	+	0/+	0/+	0/+	?	?	?	++
Heritage	0/+	0/-	-	--	-/-	-	-	-	-/-	-/-	--	--	-
Housing	---	-	++ +	+	++	+/++	+++	+++	+	+++	+++	+	+++
Land use	+	-	--	--	--	+	--	--	--/-	--/-	---	--	-/-
Landscape	0/-	+	--	--	--	-/-	--	-	--	--/-	---	--	-
Noise	0/-	0/-	?	--/-	--	-/-	-	0/-	-	-/-	-	--	-

Sustainability Objective	1 No MGB	2 No AONB Majors	3 DLP	4 Main Towns	5 Main Towns/ Large Villages	6 Meet need no MGB loss	7 Proportional to services	8 Services & AONB	9 Dispersed Country-side	10 Uncapped	11 Un-capped & Unmet	12 No Plan	13 PSLP
Resources	?	?	?	?	?	?	?	?	?	?	?	- -	?
Services	0 / +	0 / +	?	++	+ / ++	0 / +	+	+	- - -	0 / +	0 / +	?	0 / +
Travel	0	-	?	+ / ++	-	- - / - - -	- -	-	- - -	- -	- -	?	0 / +
Waste	0	0	0	0	0	0	0	0	0	0	0	- -	0
Water	-	0 / -	?	?	-	-	-	-	-	?	?	?	?

A colour version of this table is available as Table 26 on page 84 of the SA report [[CD 3.130a](#)].

Appendix 2: Locations considered as new settlements where transport was a key consideration

Location	Road links to main settlement	Rural Lanes Status	Distance to main settlement (km)	Distance to large town (km)
Blantyre House	Minor roads and rural lanes	n/a	Staplehurst – 6.6km Marden – 6.4km (via Curtisden Green)	Maidstone – 17.8km
Frittenden	Minor roads and rural lanes	Headcorn Rd Connecting Frittenden to northern settlements. Top 10% overall score	Headcorn – 4.6km Staplehurst – 5.2km	Maidstone – 17.8km
Horsmonden	Minor roads and rural lanes	Horsmonden Rd Connecting Horsmonden to Brenchley. 'Good' overall score	Paddock Wood – 7.1km (via Brenchley) Marden – 9 km (via Winchet Hill)	Royal Tunbridge Wells – 13.4km
Tudeley	B road with potential for improvement	n/a	Tonbridge – 3.8km	Tonbridge – 3.8km Royal Tunbridge Wells -

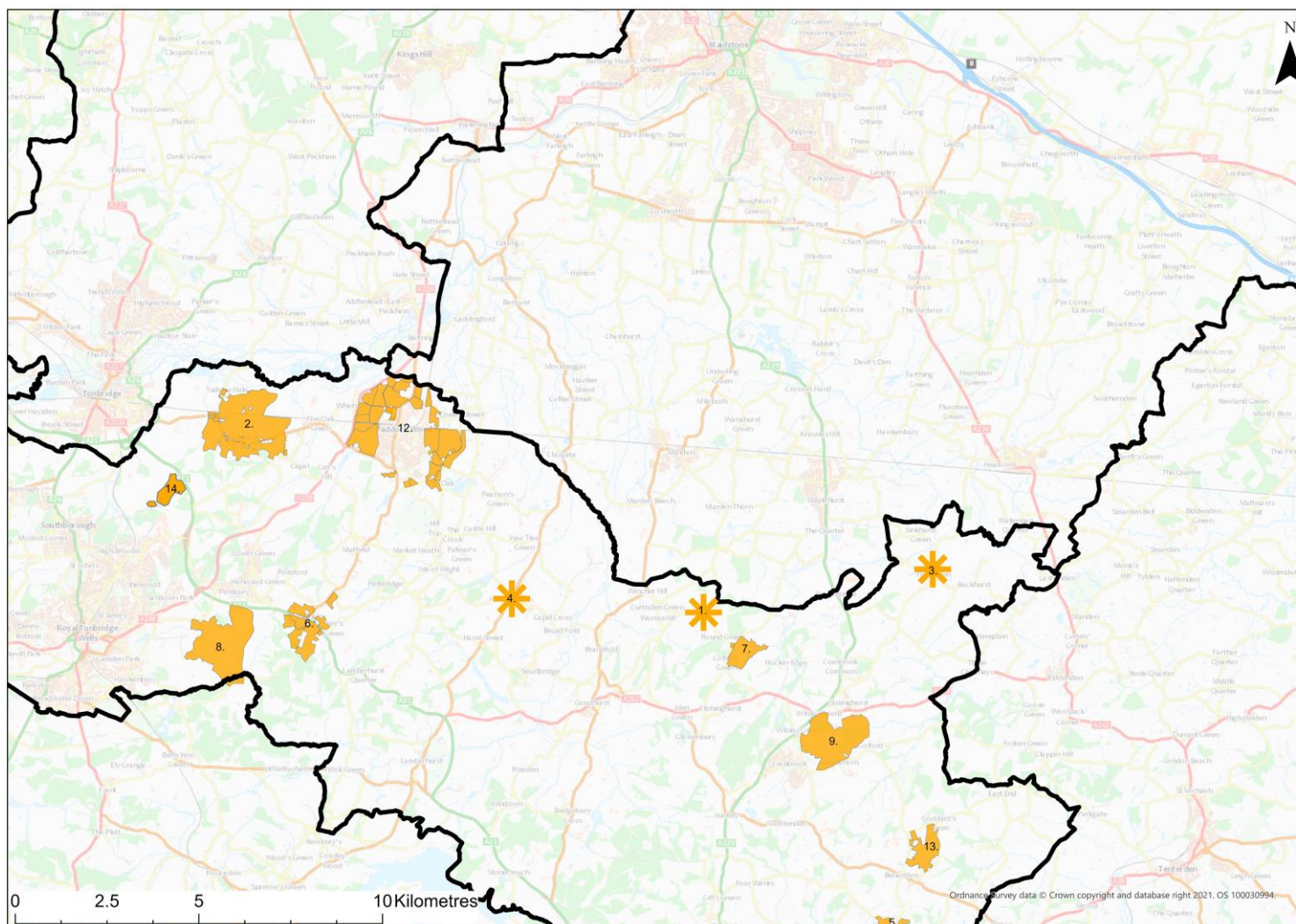
Table continued overleaf

Sources: Distances were obtained from Google Maps and information on the status of rural lanes was obtained from the Rural Lane SPD [\[CD 3.117\]](#). The Lanes described are those that new residents would be predicted to use to reach the main towns described and are illustrated in Appendix 11 of the SPD.

Location	Pedestrian/ cycle access	Key services at main settlement*	Public transport
Blantyre House	Limited.	<p>Staplehurst – 8 out of 9 key services/facilities (lacking a secondary school)</p> <p>Marden – 6 out of 9 key services/facilities (lacking a secondary school, frequent bus service and supermarket)</p>	<p>Staplehurst - Mon-Sat: hourly bus service to Maidstone and Sandhurst Sun: 2 hourly service</p> <p>Marden – Mon-Fri: 7 buses per day to Goudhurst, 8 to Maidstone on a 2-3 hourly service. No weekend service One train line to London</p>
Frittenden	Limited.	<p>Staplehurst – 8/9 key services/facilities (lacking a secondary school)</p> <p>Headcorn – 7 out of 9 key services/facilities (lacking a secondary school and supermarket)</p>	<p>Headcorn - Mon-Sun: hourly bus service to Maidstone and Tenterden, with additional peak services and early morning and late evening services Mon-Sat One train line to London</p>
Horsmonden	Limited.	Paddock Wood – 9 out of 9 key services/facilities	<p>Paddock Wood - Mon-Sat: hourly bus services to Tonbridge, Tunbridge Wells and Maidstone Sun: 2 hourly service to Tunbridge Wells and Maidstone Two train lines (to London & local towns)</p>
Tudeley	Possible with highway / public right of way improvements, or entirely off-highway to edge of Tonbridge.	Tonbridge – 9 out of 9 key services/facilities	<p>Tonbridge - frequent bus services to nearby towns 7 days per week Multiple train lines to London</p>

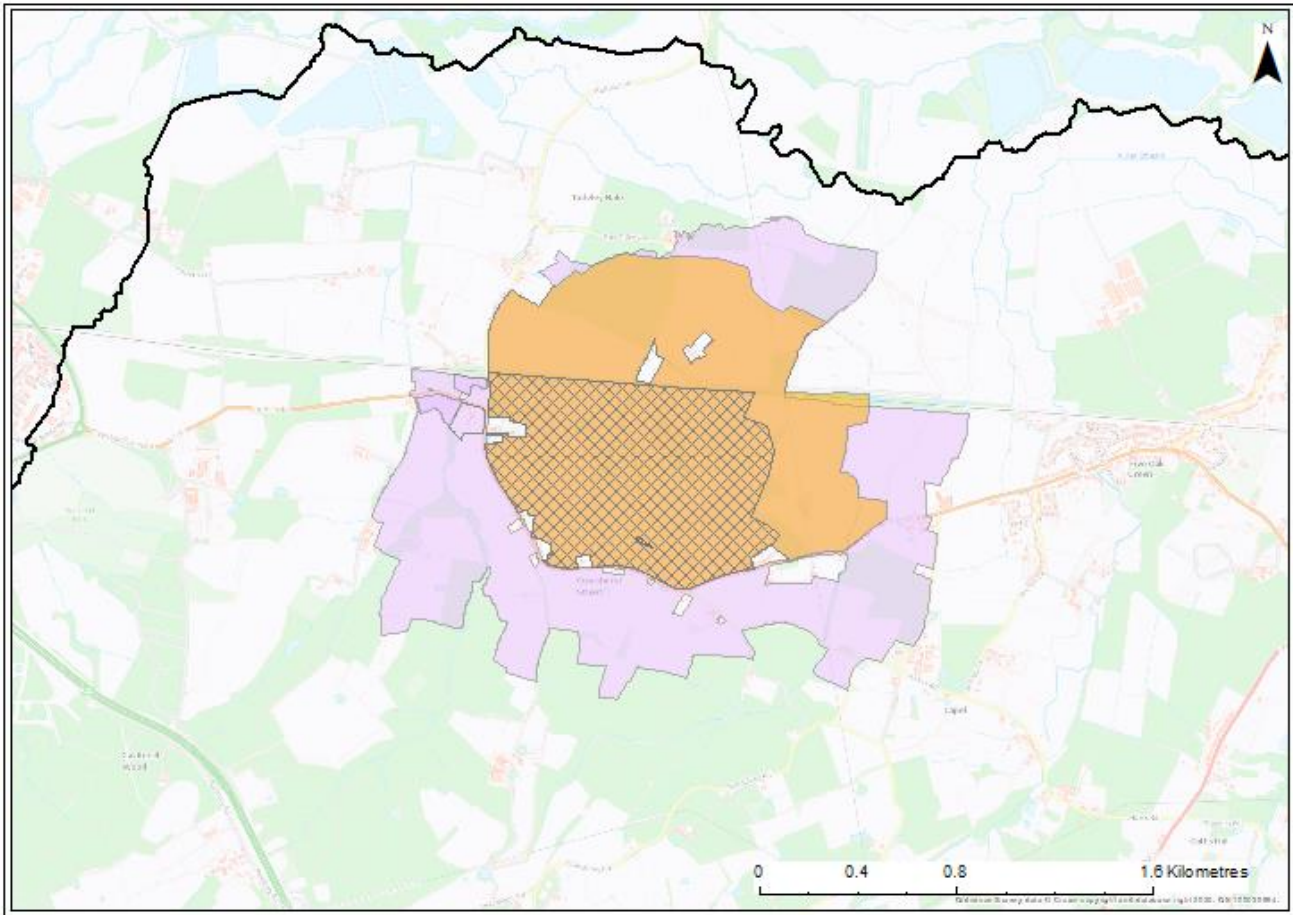
* See Appendix B of the Sustainability Appraisal for a list of key services.

Sources: Bus routes and frequencies were obtained from [Bustimes.org](https://www.bustimes.org), with certain routes checked from local providers [Arriva](#) and [Nu-Venture](#). The rest of the facilities were obtained from the following: [Google Maps](#), [Kent School Database](#), [NHS find a GP](#), [Post Office branch finder](#) and [Southeastern Railway](#).



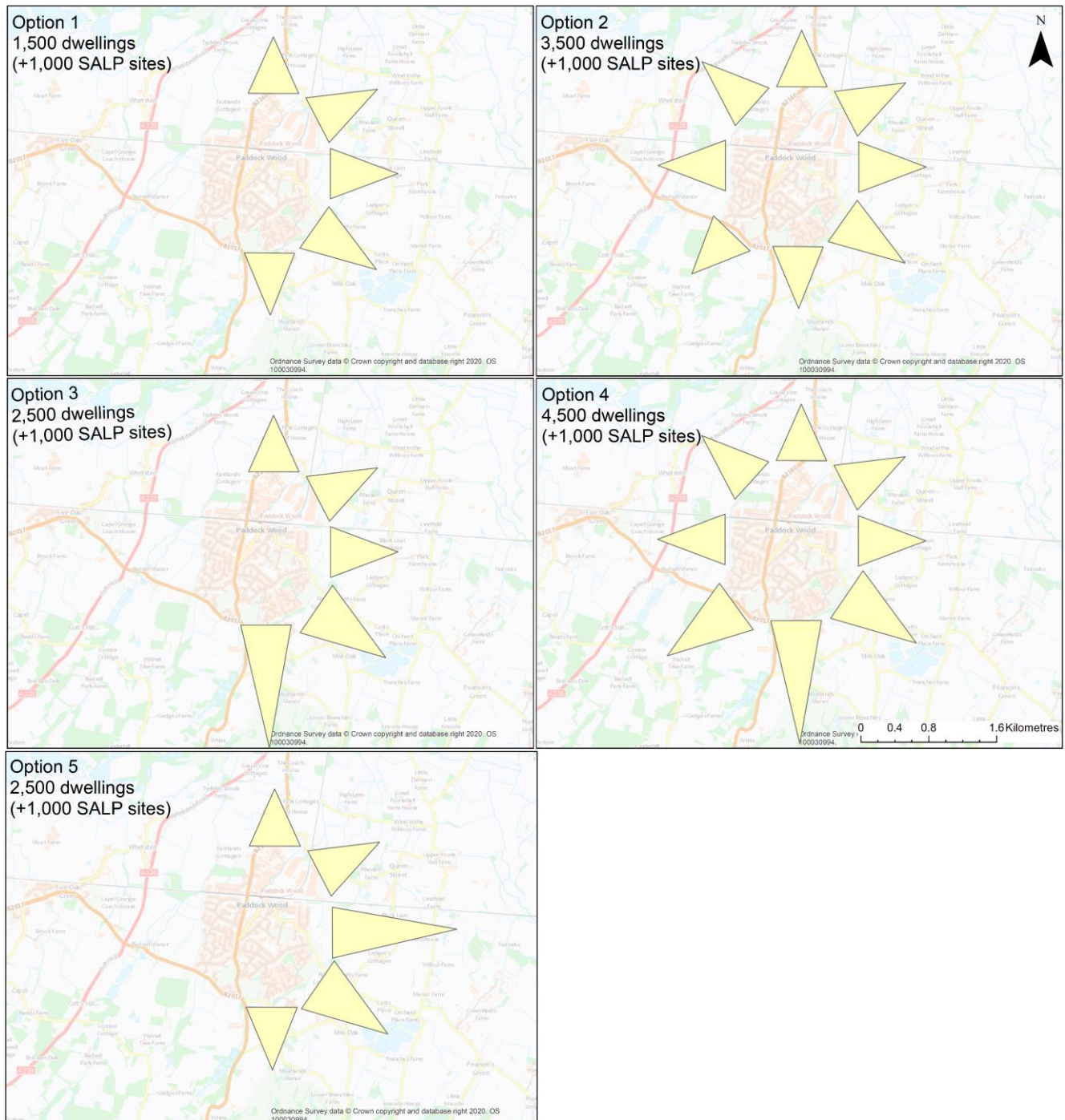
Map of garden settlement options within the Borough (referred to as Figure 5 within the SA report).
 Numbering explained in Table 27 on page 86 [\[CD 3.130a\]](#).
 Transposed to show main settlements outside of the borough.

Appendix 3: Tudeley Village growth options



Map of growth options 1 (hatch), 2 (orange) and 3 (purple) for a garden settlement in Capel Parish.

Appendix 4: Paddock Wood growth options



Map of urban extension options for Paddock Wood including land in east Capel.