

Tunbridge Wells Borough Local Plan  
Examination Matter 1  
Issue 3 Sustainability Appraisal

Written Statement by Berkeley Strategic  
February 2022

## 1.0 Introduction

- 1.1 This statement has been submitted by Berkeley Strategic (“Berkeley”) to the examination of the Tunbridge Wells Borough Local Plan (“the plan”).
- 1.2 Berkeley is the owner of land at Tutty’s Farm, Hawkenbury, Tunbridge Wells (SHELAA Site Reference 434). The site is not proposed for allocation in the plan.
- 1.3 In this submission, Berkeley responds specifically to Matter 1, Issue 3 Sustainability Appraisal, Question 6.

## 2.0 Matter 1, Issue 3 – Sustainability Appraisal

### **QU6. 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?**

- 2.1 In summary, Berkeley’s response to this question is that alternative distributions of development have not been robustly considered and that inadequate reasons have been given for why the chosen distribution has been selected.
- 2.2 The Sustainability Appraisal considers 13 options, referred to as Growth Strategies, for the spatial distribution of development within the plan area. These are set out in Table 12 of the Sustainability Appraisal. Growth Strategy 13 is the selected plan strategy. Growth Strategy 5 (Main Towns & Large Villages) involves a majority of development being directed to Royal Tunbridge Wells/Southborough and a proportion distributed to other main settlements of Paddock Wood, Cranbrook and Hawkhurst, and to some of the larger villages. Under Growth Strategy 5, no new garden settlement or strategic expansion of Paddock Wood and east Capel is proposed.

#### Assessment of Options

- 2.3 It is considered that the Sustainability Appraisal does not provide a robust assessment of the options for the distribution of development as the positive effects of the selected Growth Strategy 13 have been overstated, while the negative effects of alternative options, have been overstated. In particular, the sustainability benefits of locating a majority of development at the largest and most sustainable settlements in the borough, such as Royal Tunbridge Wells, are not adequately reflected in the assessment of options.
- 2.4 By way of an example, a comparison of the assessment of the selected Growth Strategy 13 with Growth Strategy 5 shows the following discrepancies in the conclusions reached.
  - Climate Change
- 2.5 Growth Strategy 13 is scored a single negative, while Growth Strategy 5 is scored a double negative. The reason given in Table 17 for the double negative scoring of Growth Strategy 5 is that it reflects the increase in transport related carbon as a result of less development being focused in urban areas with less good public transport and active transport possibilities.

- 2.6 Given that Growth Strategy 5 seeks to focus a majority of development on the main settlements in the Borough, which by their nature have better access to good public transport and active travel opportunities, it is regarded that this scoring is unjustified.
- Deprivation
- 2.7 Both Growth Strategy 13 and 5 are scored a double positive for this criteria. However, as is acknowledged in Table 17, pockets of deprivation are generally concentrated in urban areas, and that developing in these areas increases the likelihood that these could be improved.
- 2.8 Given that Growth Strategy 5 directs a majority of development to the main urban areas, this strategy would logically provide a greater opportunity to tackle areas of deprivation in comparison with Growth Strategy 13 that would locate a large amount of development away from existing urban areas. Growth Strategy 5 should therefore score more positively than Growth Strategy 13.
- Housing
- 2.9 Growth Strategy 13 is scored a triple positive, while Growth Strategy 5 is scored a double positive. Both options plan to meet the Borough's housing need in full and therefore both options should be scored equally.
- Travel
- 2.10 Growth Strategy 13 is scored neutral, while Growth Strategy 5 is scored a single negative. Table 17 identifies that the negative scoring of Growth Strategy 5 is due to growth being diverted away from the main towns, meaning that transport options become more limited and private car use begins to dominate.
- 2.11 Growth Strategy 5 locates a majority of development at the main settlements in the Borough. The conclusion of the assessment of this option, which refers to 'growth being diverted away from the main towns', is therefore inconsistent with the option being tested. The scoring of this option is therefore based on an erroneous assessment process.
- 2.12 By locating a majority of development at the main settlements, Growth Strategy 5 provides the opportunity to locate development in places with good access to public transport services and active modes of travel. The option should therefore score positively against this criteria.
- 2.13 This analysis has demonstrated that the assessment of the options for the distribution of development is not robust as it overstates the positive effects of Growth Strategy 13. In contrast, the positive effects of Growth Strategy 5 have been understated. The assessment fails to give adequate recognition to the acknowledged sustainability benefits associated with a distribution of development which locates the majority of development at the largest and most sustainable settlements in the borough.

#### Reasons for Selecting the Preferred Approach

- 2.14 The NPPG (Paragraph: 018 Reference ID: 11-018-20140306) requires that the sustainability appraisal needs to "provide conclusions on the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach in light of the alternatives".

- 2.15 The Sustainability Appraisal provides insufficient explanation of the conclusions reached and the reasons why the growth strategy for the plan (Growth Strategy 13) was selected and other options rejected. Paragraphs 6.2.8 – 6.2.15 compare the relative positive and negative effects of the options tested. However, it is only paragraph 6.2.17 that provides reasoning for the conclusion reached, simply stating that “in comparison to the other growth strategies, it can be seen that the Growth Strategy for the Pre-Submission Local Plan strategy is successful in maximising beneficial effects and minimising negative effects”.
- 2.16 It is therefore not clear from the Sustainability Appraisal what are the conclusions reached in relation to the reasons the rejected options are not being taken forward and the reasons for selecting the preferred approach.

#### Conclusion

- 2.17 Berkeley’s opinion is that Growth Strategy 5, which locates a majority of development at the main settlements in the Borough, particularly Tunbridge Wells, has not been accurately assessed and that the positive effects of the option have been understated. Additionally, insufficient reasons have been given for the selection of Growth Strategy 13 as the basis for the plan.