

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

**Matter 1: Green Belt Assessment, Sustainability
Appraisal and Local Plan Review**

Issue 2: Sustainability Appraisal Addendum

Document Reference: TWLP/117



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Matter 1 – Green Belt Assessment, Sustainability Appraisal and Local Plan Review

Issue 2 – Sustainability Appraisal Addendum

Sustainability Appraisal Background

1. In accordance with paragraph 001 of the PPG for Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) (See Reference ID: [11001-20190722](#)) the role of the 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, an 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 3.156](#)].
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 Plan both before and after the examination hearing sessions held in 2022. 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 Post Examination Addendum report [[PS-037](#)]. This report provided an

update to the Submission SA [[CD 3.156](#)] to help inform the suggested new growth strategy outlined in Development Strategy Topic Paper Addendum [[PS 054](#)].

Inspector's Question 1: [re. Sustainability Appraisal Consideration of Spatial Strategy]

Q1. Has the Sustainability Appraisal Addendum adequately considered the suggested spatial strategy (i.e. a Plan without Tudeley Village and reduced development in East Capel) against reasonable alternative spatial options?

TWBC response to Question 1

5. Yes. Chapter 6.3 of Part 1 of the Post Examination SA Addendum report [[PS-037](#)] provides a detailed comparison of the suggested spatial strategy against six, new reasonable alternative options.
6. The six, new options compare a variety of temporal and spatial approaches to growth in the borough and also refer back to strategies that were considered during previous iterations of the SA such as the option to continue without a Local Plan. This approach to the SA has ensured a robust and holistic understanding of the outcome of all the SA assessments, and provided clear guidance as the strategy moved forward.
7. This new assessment and comparison of spatial strategies was informed by a consideration of revised approaches for both Tudeley Village and a Paddock Wood town extension. These revised approaches are presented in Chapters 6.1 and 6.2 of the Part 1 Post Examination SA Addendum report [[PS-037](#)] respectively.
8. For Tudeley Village, a newly revised approach for the settlement (Revision A) which addresses a reduced quantity of development coupled with a similar distribution to that established in the Submission SA report has been scored and discussed.
9. At Paddock Wood, including land at East Capel (strategic allocation Policy STR/SS 1), three newly revised approaches for the strategic site that provide alternative distributions of housing growth outside of Flood Zones 2 and 3 have been scored and discussed. These approaches are referred to as Revisions A, B and C, and are described in full at paragraph 6.2.1 of the Post Examination SA Addendum report [[PS-037](#)].
10. By combining Revision A (or an absence of growth) for Tudeley with Revisions A, B and C for Paddock Wood and a revised housing land supply from 15 to 10 years, the six

new Strategic Growth Options discussed in paragraphs 5 and 6 above were established and assessed.

11. The conclusion of this exercise was that the differences between the development strategy options were marginal. In general, the reduction in housing numbers brought benefits to the Land Use objective as land take has lowered. Whereas the altered distribution of housing across the three revisions to STR/SS1 all bring about improvements to the water score. Finally, slight improvements in the housing score are brought about by the options which provide the certainty of a 15 year supply. Lower housing scores were applied for options with a 10 year housing land supply, which were reliant on an early review of the Local Plan.
12. Across the three options for Paddock Wood, there was found to be merit to both Revision A and B. However, it should be noted that the SA did not take into account deliverability which may be less of a barrier for Revision B. Section 10.0 of the Development Strategy Topic Paper Addendum sets out the Council's consideration of the different development strategy options, and concludes on the preferred development strategy option at Section 12.0 [\[PS 054\]](#).

Inspector's Question 2: [re. Reasonable Alternative Options]

Q2. If the Plan does not provide sites sufficient to meet the housing requirement, have the implications been considered against reasonable alternative options that would meet housing needs?

TWBC response to Question 2

13. Yes. The SA has considered numerous options whereby the housing needs are not met in the required 15-year trajectory and instead a 10 year housing land supply is reverted to with a requirement for an early review. Likewise, at all applicable stages of Sustainability Appraisal, a strategic growth option whereby no Local Plan is adopted was assessed and scored. All options for comparison are presented, scored and discussed within Tables 25 and 26, and Chapter 6.3 of the Post Examination SA Addendum report [[PS -037](#)].
14. Options which do not meet housing need are summarised below alongside the corresponding option number discussed within the Development Strategy Topic Paper Addendum (DSTPA) [[PS 054](#)]:
15. **Option number 12 (DSTPA Option 7).** Housing need not met due to decision to complete further work rather than adopt the submission Local Plan.
16. **Option number 16 (DSTPA Option 4).** 15-year housing need not met due to absence of Tudeley village and reduced growth at Paddock Wood (Revision A). Instead, a 10-year housing land supply is achieved with a commitment to an early review of the Local Plan.
17. **Option number 17 (DSTPA Option 5).** 15-year housing need not met due to absence of Tudeley village and reduced growth at Paddock Wood (Revision B). Instead, a 10-year housing land supply is achieved with a commitment to an early review of the Local Plan.
18. **Option number 18 (DSTPA Option 6).** 15-year housing need not met due to absence of Tudeley village and reduced growth at Paddock Wood (Revision C). Instead, a 10-year housing land supply is achieved with a commitment to an early review of the Local Plan.

19. **Option number 19A (DSTPA Option 2).** 15-year housing need not met due to decrease in growth at both Tudeley village and Paddock Wood (Revision A, B or C). Instead, a 10-year housing land supply is achieved with a commitment to an early review of the Local Plan.
20. Reasonable alternative options that *do* meet housing needs are summarised below alongside the corresponding option number discussed within the Development Strategy Topic Paper Addendum (DSTPA):
21. **Option number 13.** Distribution and quanta of development first presented in the Pre Submission Local Plan.
22. **Option number 14 (DSTPA Option 1).** 15-year housing needs met despite decrease in growth at Tudeley.
23. **Option number 15 (DSTPA Option 3).** 15-year housing needs met only very marginally so this option includes the potential need for an early review.
24. **Option number 19B (DSTPA Option 2).** 15-year housing need met despite decrease in growth at both Tudeley village and Paddock Wood (Revision A, B or C) by utilising a reduced buffer.
25. The implications for not meeting housing needs are shown in the scores and commentaries found in Table 26 of the SA Addendum report [[PS -037](#)]. These are summarised below:
26. In all scenarios, the housing scores are reduced from highly positive (+ + / + + +) to less positive (+ / + + or + + or +) by choosing an option that does not meet the 15-year housing land supply i.e. Options 12, 16, 17, 18 and 19A.
27. The Land Use score tended to become less negative when moving from options which do meet housing need to those that do not, reflecting reduced land take and reduced loss of greenfield or green belt land.
28. Where no plan was taken forward (Option 12), many scores are found to be negative when compared to options in which housing needs are met. This reflects the uncertainty in delivery without an adopted Local Plan.

Inspector's Question 3: [re. SA of Main Modifications]

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

TWBC response to Question 3

29. In response to the question of whether the suggested Main Modifications have been subject to adequate Sustainability Appraisal, the answer is yes. The process undertaken within the Part 1 SA Addendum report followed the same method established at scoping stage, and which has been applied consistently throughout each stage of Local Plan preparation.
30. Part 2 of the Post Examination SA Addendum report is being drafted to help inform the Council once the Stage 3 hearing sessions are complete. It will be finalised once a final schedule of Main Modifications is available to assess.
31. The Council received nine representations on the Part 1 SA Addendum report and these have been summarised and responded to by the council. They have been published on the Council's website [[PS_076](#)], alongside the TWBC responses [[PS-077g](#)].
32. Of the nine representations, three were found to fall outside of the scope of the consultation for the Part 1 SA Addendum, instead referring to sites proposed for allocation in previous iterations of the Sustainability Appraisal that have not been reassessed at this stage (Rep Numbers 19-2, 135-3 and 142-2). Two representations queried the definition of reasonable alternatives or questioned which sites should be allocated (Rep Numbers 126-5 and 140-2). Three representations queried the scope of the SA Addendum report and whether the reassessment of site scores in light of the new Green Belt Stage 3 study was sufficient at this stage (Rep numbers 152-4, 169-8 and 174-7). Finally, one representation supported the findings of the SA Addendum (Rep Number 153-7).