

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council

Matter 2 Clarification Note: typographical errors within Sustainability Appraisal

Date: 03 March 2022

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Clarification Note

1. This Clarification Note has been produced by the Council at the request of the independent Inspector appointed to examine the Tunbridge Wells Local Plan.
2. As explained during the second day of Stage 1 hearings on Wednesday 02 March 2022, there is a typographical error in Table 12 of the Sustainability Appraisal [CD 3.130a].
3. Within Table 12 on page 52, the row that considers Growth Strategy Option 11 (Uncapped and Unmet Need) includes the following error:

“Distribution as per Growth Strategy 9 above, but with likely further development in the AONB.”
4. Instead of Growth Strategy 9, the reference in this sentence should have been made to the previous Growth Strategy in Table 12 (Growth Strategy 10: Uncapped Need) which includes an assumption that a high proportion of development for this option would occur within the AONB.
5. The description for Growth Strategy 11 was intended to expand upon the assumption for Growth Strategy 10 by explaining how growth would be *further* distributed in the AONB. On reading the options as a whole, Option 11 can be seen to be a natural progression of Option 10.
6. In contrast, Growth Strategy 9 (Dispersed Countryside) is a very specific growth strategy that addressed the housing need by distributing development into very rural areas and should not have been compared to Growth Strategies 10 nor 11.
7. This typographical error was identified after submission of the Local Plan by one participant who queried the information in their Hearing Statement and during the Hearing session on Wednesday 02 March.

8. In addition, the Borough Council has now noted a further error in Table 12, also in relation to Growth Strategy 11. Whereas the first paragraph under 'Description' states that under this option "*The overall scale of growth is 847 dwellings per year (741+1900/18) ...*" the text in the 'Growth Strategy' column states "*Housing supply: 853 dwellings per year*".
9. The correct figure, that has been used to assess this option is 847 dwellings per year (dpa).
10. This anomaly has occurred because when the options were first being identified, the most recent affordability ratio was that for 2018, which produced an uncapped need of 853 dpa. While the options were being appraised, the 2019 affordability ratio was published and the calculation of uncapped need updated, now being 847 dpa, and the assessment took place on this basis. Unfortunately, the Growth Strategy housing supply figure was not updated accordingly.
11. It is noted that the difference between the two figures is very small, being only 6 dwellings (or 0.7%).
12. A corrected version of Table 12 is included in Appendix 1.
13. As a result of the correction set out above, Tunbridge Wells Borough Council has reissued the corrected Sustainability Appraisal which can now be found at CD 3.156.

Appendix 1

Corrected version of Table 12.

Growth Strategy	Description
<p>1: No MGB</p> <p>Housing supply: 346 dwellings per year (11,526-565 / 17)</p> <p>Strategic sites: None</p>	<p>This strategy reduces growth below the housing need level to one that does not involve any loss of Green Belt. The scale of housing is reduced by some 5,650 homes (49% of housing need for 11,526) and loss of large employment areas. Key allocations that have been removed from Growth Strategy 3 include Tudeley Village, 2,000 less dwellings at PW (western parcels) and, at RTW, removal of the allocations at North Farm industrial estate, Mabledon and Spratsbrook. Apart from this, the distribution remains the same as Growth Strategy 3 (the Draft Local Plan).</p> <p>The complete list of allocations that have been removed is as follows:</p> <ul style="list-style-type: none"> • Tudeley Village • parcels west of Paddock Wood (in Capel Parish) • land at Mabledon and Nightingale • sites south of Pembury (PE1-3) • SP1 at Speldhurst • edge sites at RTW, notably: <ul style="list-style-type: none"> - Wyevale (RTW14) - Spratsbrook (RTW16) and - Employment site (RTW17)
<p>2: No AONB Majors</p> <p>Housing supply: 560 dwellings per year (11,526-2000 / 17)</p> <p>Strategic sites: Yes</p>	<p>This strategy reduces development below the housing need to one that does not involve any major development in the High Weald AONB. This means that the scale of housing is reduced by between 1,600 - 2000 dwellings (17% of housing need for 11,526) and large employment areas are removed. Apart from this, the distribution remains the same as Growth Strategy 3 (the Draft Local Plan).</p> <p>The complete list of allocations to be removed, or reduced to minor development, is as follows:</p> <ul style="list-style-type: none"> • Longfield Rd (RTW 17) • Spratsbrook (RTW 16) • Turnden Farm (CRS 1) • Crane Valley (CRS 3) • Copthall Avenue/Highgate Hill (HA 4) • Gills Green (HA 6) - employment • Gill's Green Farm (HA 7) - employment use • Brenchley Road, Coppers Lane, and Maidstone Road (BM 1) • Pembury - sites south of village (PE 1-3)

Growth Strategy	Description
	<ul style="list-style-type: none"> • Land at Mabledon, Southborough • Gate Farm, Cranbrook • Golford Road, Cranbrook • Land at the Golf Course, Hawkhurst • Fowlers Park, Hawkhurst • Ashes Plantation, Matfield
<p>3: Draft Local Plan</p> <p>Housing supply: 678 dwellings per year (existing capped need in line with the standard method)</p> <p>Strategic sites: Yes</p>	<p>This growth strategy is that of the Draft Local Plan and includes a large PW extension and new garden village at Tudeley.</p>
<p>4: Main Towns</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: Paddock Wood and east Capel only</p>	<p>Growth strategy based upon Option 1 of the Issues and Options SA with adjustments made to reflect the incorporation of growth along the A21 corridor, greater detail about the intention for site allocations and Development Management policies within the new Local Plan, the updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>To compensate for the absence of a new settlement at Tudeley (i.e. 2,100 dwellings within the plan period), this option assumes that:</p> <ul style="list-style-type: none"> • RTW/SO has increased allocations, from c1,270 to c3,000 residential allocations • Paddock Wood and east Capel retains strategic growth of up to 4,000 allocations • Cranbrook has an increase from c760 to 1,200 residential allocations • Hawkhurst has an increase from c670 to 1,000 residential allocations • The residential allocations in villages are reduced by an average of a half (of c1,120 = c560), giving c40-50 each.
<p>5: Main Towns & Large Villages</p> <p>Housing supply: 678 dwellings per year</p>	<p>Growth strategy based upon Option 2 of the Issues and Options SA with the majority of new development directed to Royal Tunbridge Wells/Southborough and a proportion distributed to other main settlements of Paddock Wood, Cranbrook and Hawkhurst (as per Option 1), but additionally a percentage of development directed to some of the larger villages (taking account of the updated Role and</p>

Growth Strategy	Description
<p>(existing capped need)</p> <p>Strategic sites: No</p>	<p>Function Study 2020). Limited development within the remaining villages and rural areas, and no new garden settlement or strategic expansion of Paddock Wood and east Capel.</p> <p>Adjustments made to reflect the greater detail about the intention for site allocations and Development Management policies within the new Local Plan and the updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>To compensate for the absence of a new settlement at Tudeley (i.e. 2,100 dwellings within the plan period), and less growth at PW, this option assumes:</p> <ul style="list-style-type: none"> • RTW/SO has increased allocations, from c1,270 to c3,000 residential allocations • 2,250, rather than 4,000, at PW such that the development is considered large but not 'strategic' so is less effective at providing wider benefits such as flood alleviation elsewhere • Cranbrook has an increase from c760 to 1,200 residential allocations • Hawkhurst has an increase from c670 to 1,000 residential allocations • Pembury increases from 300 to 400 residential allocations • Rusthall increases from 15 to c400 residential allocations (i.e. 5% each) • Goudhurst, Benenden, Brenchley and Langton Green (Speldhurst) and Horsmonden each have c250 residential allocations (3% each) • The residential allocations in remaining villages are reduced by an average of a half (of c440 = c220), giving c30-40 each.
<p>6: Meet need with no Green Belt (MGB) loss</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>No new garden village or urban extension of PW and east Capel into Green Belt, or other Green Belt releases. Growth to meet housing need focused on settlements outside Green Belt; also, growth moderated in the AONB. To meet housing need, this would include:</p> <ul style="list-style-type: none"> • Major growth of Paddock Wood, with focus to south-east (c4,000) • Major growth Horsmonden (c1,000) • Major growth at Frittenden (c800) • Major growth at Sissinghurst (c800) • Growth of AONB settlements as per Option 8 <p>This option was appraised in order to respond directly to presumption to retain Green Belt and focus growth elsewhere. It follows that major development would still take place in the AONB but be primarily focussed on settlements outside it as well as beyond the Green Belt.</p>

Growth Strategy	Description
	<p>Paddock Wood is still the prime growth point, but with focus away from the Green Belt, together with the 3 'unconstrained' villages.</p> <p>Note: There is further consideration of major growth of these villages in relation to new settlements, while options for growth around Paddock Wood are also separately appraised below.</p>
<p>7: Proportional to Services</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>Growth strategy based on the relative levels of services and facilities of settlements. The development distribution would be similar to Option 3 of the Issues and Options stage SA which described a proportional distribution across all the borough's settlements but this time with regard to the relative sustainability of settlements in terms of services and facilities. The updated Role and Function Study 2020 has been referred to for this assessment.</p> <p>Adjustments made to reflect the greater detail about the intention for site allocations and Development Management policies within the new Local Plan and the updated evidence base (including Plans, Policies and Programmes) since the scoring was originally carried out in 2016/2017.</p> <p>In terms of residential allocations, this option assumes:</p> <ul style="list-style-type: none"> • 25% to RTW/SO (c2,250) • 10% each to PW, Cranbrook and Hawkhurst (c900 each) • 7.5% each to Pembury and Rusthall (c650 each) • 3% each to 5 Group D villages (c250 each) • 2% each to 6 Group E villages (c180 each) • 1.5% each to 2 Group F villages (c100 each)
<p>8: Services and AONB</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: No</p>	<p>This growth strategy is similar to Growth Strategy 7 but moderated where settlements are within the AONB. This means a lower proportion of growth is allocated to Cranbrook, Hawkhurst and the smaller settlements which are washed over by this sensitive landscape.</p> <p>For this option, it is assumed that the scale of development at AONB settlements is half of the level in Development Strategy Option 6, specifically:</p> <ul style="list-style-type: none"> • Cranbrook and Hawkhurst c450 each; • Pembury (as enveloped by AONB) 325; • Goudhurst, Langton Green, Benenden and Brenchley c125 (Group D villages in 2020 Role and Function Study excluding Horsmonden); • Lamberhurst, Speldhurst, Sandhurst, and Bidborough villages c90 each (Group E villages in 2020 Role and Function Study excluding Five Oak Green and Sissinghurst); <p>This is an overall reduction of c25% of allocations in those settlements,</p>

Growth Strategy	Description
	which is balanced by proportional increases in RTW/SO, Rusthall, Horsmonden, Five Oak Green, Sissinghurst and Frittenden.
<p>9: Dispersed Countryside</p> <p>Housing supply: 678 dwellings per year (existing capped need)</p> <p>Strategic sites: Yes</p>	<p>This Growth Strategy is based upon is based on a distribution that meets the identified needs by directing development into rural areas, much less to existing villages and much more to hamlets and farmsteads, particularly in the AONB.</p> <p>This option assumes that the growth of settlements outside of RTW/SO and the strategic sites is a half of that proposed in the DLP, equivalent to an overall reduction of 1,275. This number is to be redistributed to hamlets and other enclaves of development, including farmsteads across the countryside, with c5-20 new dwellings in c75-200 locations.</p> <p>It was assumed that business growth in RTW would still be possible as the urban distribution is still similar to Growth Strategy 3 (Draft Local Plan). Instead, the rural AONB distribution is altered.</p>
<p>10: Uncapped Need</p> <p>Housing supply: 741 dwellings per year</p> <p>Strategic sites: Yes</p>	<p>A growth strategy that meets the 'uncapped' local housing need to reflect national planning practice guidance, as it was found possible to meet the needs for the borough under the standard method.</p> <p>The distribution is as per Growth Strategy 3 (Draft Local Plan) with further development across settlements, including in the AONB.</p> <p>It is assumed that, as the strategic sites are being developed to their maximum capacity within the plan period and equate to 2/3 of total allocations, there would be an average 30% increase across other growth locations, with an additional 1,000+ homes in total. With potential sustainable growth outside the AONB already maximised, it is assumed a high proportion of this would be at AONB settlements.</p>

Growth Strategy	Description
<p>11: Uncapped & Unmet Need</p> <p>Housing supply: 847 dwellings per year</p> <p>Strategic sites: Yes</p>	<p>A growth strategy that meets the uncapped housing need plus unmet housing need from elsewhere. The development would meet the higher housing need figure of 741 dwellings per year as well as some unmet need from elsewhere, equivalent to some 1,900 dwellings currently unmet in Sevenoaks Borough. The overall scale of growth is 847 dwellings per year $(741+1900/18)$ which is 25% above local housing need. Distribution as per Growth Strategy 10 above, but with likely further development in the AONB.</p> <p>The overall scale of growth is c 3,000 homes more than housing need under the (capped) standard method. $(741-678=63 \times 18=1,134+1,900)$ The distribution is as per option 9 above, but likely still further housing in the AONB as well as the loss of more (relative to Option 3: the DLP) Green Belt, including the losses around RTW/Southborough.</p>
<p>Option 12: No Local Plan</p>	<p>This growth strategy involves no planned growth. Only windfall sites provide for the development needs of the borough and thus not all needs may be met.</p>
<p>Option 13: Pre-Submission Local Plan</p>	<p>Following a review of the findings for Strategic Growth Options 1-12, work was undertaken on developing a suitable strategy for the Pre-Submission Local Plan. To undertake this work, consideration of the impact that the range of different scales and distributions had on scores was undertaken. See results sections for an explanation of how this strategy was derived.</p>