

Tunbridge Wells Borough Council

Proposed Schedule of Minor Modifications

Tunbridge Wells Borough Local Plan: Sustainability Appraisal

Factual updates and additions following consideration of Pre-Submission Local Plan consultation comments

October 2021

Section	Paragraph	Current text	Proposed text	Reason for change
Document History	n/a	[Current text records document history up to February 2021]	Tables updated to include document history up to October 2021	To bring document history up to date.
1. Introduction	1.3.3 and 1.3.4	[paragraphs split mid-sentence]	[paragraphs combined]	Formatting error
1. Introduction	1.3.5	As options were continually developed and refined, a further iteration of the Stage B process was applied to the refined objectives, allocation of sites and policies for development management (including reasonable alternatives). The results of this exercise are summarised with the production of this Stage B report. As word continued on Stage B, the process was divided into five sub-processes (see Figure 2).	As options were continually developed and refined, a further iteration of the Stage B process was applied to the refined objectives, allocation of sites and policies for development management (including reasonable alternatives), and the process was divided into five sub-processes (see Figure 2). The results of this exercise are summarised with the production of this report which represents the end of Stage D.	To reflect the current stage of the process.
2. Consultation	2.1.2	All comments received, the Council's response and any subsequent changes made to the SA process are summarised in Appendix H of the Scoping Report, Appendix C of the Interim SA Report and the Consultation Statements for the Regulation 18 Draft Local Plan.	All comments received, the Council's response and any subsequent changes made to the SA process are summarised in Appendix H of the Scoping Report, Appendix C of the Interim SA Report, and the Consultation Statements for the Regulation 18 Draft Local Plan and the Regulation 19 Pre Submission Local Plan.	To reflect the current stage of the process.

Section	Paragraph	Current text	Proposed text	Reason for change
2. Consultation	2.1.3	The three statutory environmental consultees: Natural England, Historic England and the Environment Agency have provided comments on the SA work, including the 19 objectives identified. No fundamental concerns about the SA process or objectives have been raised.	The three statutory environmental consultees: Natural England, Historic England and the Environment Agency have provided comments on the SA work, including the 19 objectives identified. No fundamental concerns about the SA process or objectives have been raised by Historic England or the Environment Agency. Comments from Natural England received at Regulation 19 stage have been addressed in the accompanying Consultation Statement.	To reflect Natural England's comments at Regulation 19 stage.
2. Consultation	2.2 and 2.2.1	Invitation to comment As with the other stages of the SA work, this Sustainability Appraisal will be sent to the three statutory environmental consultees.	[text removed]	To reflect current stage of the process and remove repetition.
3. Legal Compliance	3.2.7	Despite several significant roads, most notably the A26 and A275, traversing the SAC, the Air Quality Modelling Report found that changes to roadside air quality within 200m of Ashdown Forest SAC and SPA as a result of the projected development outlined in the TWB Local Plan in combination with other plans and projects are expected to result in a negligible impact (possibly in the form of	Despite several significant roads, most notably the A26 and A275, traversing the SAC, the Air Quality Modelling Report found that changes to roadside air quality as a result of the projected development outlined in the Local Plan are expected to result in a negligible impact (possibly in the form of a slight retardation effect of air quality improvement) on this European site. This is the case for both	Reworded and simplified for clarity.

Section	Paragraph	Current text	Proposed text	Reason for change
		a slight retardation effect of air quality improvement) on this European site.	the Local Plan alone and in combination with other plans and projects.	
3. Legal Compliance	3.2.8	The Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reducing the breeding success of nightjar and Dartford warbler, which are ground nesting birds. However, the nearest settlement in Tunbridge Wells Borough (Speldhurst) is over 7km away and a visitor survey of the Ashdown Forest carried out in summer 2016 found that a very small proportion of the visitors to the Ashdown Forest are from Tunbridge Wells.	The Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reducing the breeding success of nightjar and Dartford warbler, which are ground nesting birds. To mitigate this, all development that results in a net increase in dwellings within a prescribed 7km zone of influence must comply with the strategic solutions outlined in Local Plan policy EN11. However, the nearest substantial settlement in Tunbridge Wells Borough (Speldhurst) is over 7km away and a visitor survey of the Ashdown Forest carried out in summer 2016 found that a very small proportion of the visitors to the Ashdown Forest are from the borough.	Reworded for clarity and to reflect Natural England's comments
4. Methodology	Table 5	[Date column for Maidstone Borough Council and Sevenoaks District Council]	[Both updated with 'Ongoing']	To reflect latest status.
4. Methodology	4.3.1 and 4.3.2	[paragraphs split mid-sentence]	[paragraphs combined]	Formatting error
6. SA of the Spatial Development Strategy	Table 28 Caption	See paragraph 6.2.31 for descriptions.	See paragraph 6.2.31 – 6.2.33.	Typographical error.

Section	Paragraph	Current text	Proposed text	Reason for change
6. SA of the Spatial Development Strategy	Table 29 Caption	See paragraph 6.2.39 – 6.2.42 for descriptions.	See paragraph 6.2.39 – 6.2.43 for descriptions.	Typographical error.
8. SA of the Potential Development Sites	8.1.1	All sites have been separately assessed against a robust methodology which is set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA). This included all sites received through two Call for Sites processes and sites received since then but prior to the 22nd February 2019 (known as 'late sites' or 'additional sites' and 'A_S' on all figures in this chapter).	All sites have been separately assessed against a robust methodology which is set out in the Strategic Housing and Economic Land Availability Assessment (SHELAA). This included all sites received through two Call for Sites processes, sites received since then but prior to the 22nd February 2019 (known as late sites or additional sites/A_S), and sites received during the Regulation 18 and 19 consultation process (known as DPC and PSPC sites).	To reflect current stage of the process.
8. SA of the Potential Development Sites	8.1.2	Sites received since 22nd February 2019 are assessed using this same methodology for possible inclusion in the Pre-Submission version of the Local Plan (Regulation 19). Likewise, any further sites received as part of the Regulation 18 consultation on the Draft Local Plan are also assessed for possible inclusion in the Pre-Submission Local Plan using the same methodology.	Sites received since 22nd February 2019 are assessed using this same methodology for possible inclusion in the Pre-Submission version of the Local Plan (Regulation 19). Likewise, any further sites received as part of the Regulation 18 consultation on the Draft Local Plan and Regulation 19 consultation of the Pre Submission Local Plan are also assessed for possible allocation using the same methodology.	To reflect current stage of the process.

Section	Paragraph	Current text	Proposed text	Reason for change
8. SA of the Potential Development Sites	Table 44 (RTW)	N/A	[Site PSPC_1 added into table]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Table 44 (RTW)	N/A	[Site PSPC_4 added into table]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Figure 10 (RTW)	N/A	[Sites PSPC_1 and PSPC_4 added onto map]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Table 51 (Paddock Wood)	N/A	[Site PSPC_7 added into table]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Figure 13 (Paddock Wood)	N/A	[Site PSPC_7 added onto map]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Table 53 (Cranbrook)	N/A	[Site DPC_23 added into table]	As per addendum issued with Feb 2021 SA.
8. SA of the Potential Development Sites	Figure 14 (Cranbrook)	N/A	[Site DPC_23 and allocation CRS 3 added onto map]	DPC_23 added as per addendum issued with Feb 2021 SA.

Section	Paragraph	Current text	Proposed text	Reason for change
				CRS 3 was previously absent in error.
8. SA of the Potential Development Sites	Table 64 (Horsmonden)	N/A	[Site PSPC_8 added into table in row for site 355]	New site submitted for consideration at Regulation 19 stage.
8. SA of the Potential Development Sites	Figure 20 (Horsmonden)	N/A	[Site PSPC_8 added onto map]	New site submitted for consideration at Regulation 19 stage.
9. SA of Development Management Policies	Table 105 (Housing Policy H3)	Option 3 column title: New policy with 2 different thresholds – greenfield (35%)/brownfield thresholds (40%) and off site contributions for 1 to 9 dwellings.	Option 3 column title: New Policy with 2 different thresholds - greenfield (40%)/brownfield (30%) and off site contributions for 1 to 9 dwellings.	Typographical error.
9. SA of Development Management Policies	Table 105 (Housing Policy H 3) Commentary	N/A	It is noted that similar scores would result if contributions were obtained for 6-9 dwellings.	Additional sentence added to explain why scores are unchanged since the number of dwellings considered by the policy was updated.
9 SA of Development Management Policies	Table 111 (Housing Policy H 8) Commentary	2020 evidence now suggests that it will be possible to deliver the majority of the self/custom build development needs delivered through windfall sites which will	2020 evidence now suggests that it will be possible to deliver the majority of the self/custom build development needs through windfall sites which will provide	Typographical error.

Section	Paragraph	Current text	Proposed text	Reason for change
		provide greater distribution across the borough than other options.	greater distribution across the borough than other options.	
Appendix C	First sentence	Mitigation measures proposed by the SA for the Draft Local Plan varied depending on the aspect being considered.	Mitigation measures proposed by the SA for the Local Plan varied depending on the aspect being considered.	To reflect current stage of the process.
Appendix C	Second paragraph, last sentence	The Draft Local Plan for Draft Local Plan has taken all the recommendations into account and made changes wherever possible.	The Local Plan has taken all the recommendations into account and made changes wherever possible.	To reflect current stage of the process and remove typographical error.
Appendix F RTW	Part 6 of 12 Site 226	[score missing for Land Use objective]	[single negative score inserted]	Typographical error.
Appendix F RTW	Part 9 of 12 Site 328	[score missing for Land Use objective]	[single negative score inserted]	Typographical error.
Appendix I Paddock Wood	Part 2 of 3	N/A	New column added for site DPC_7 including scores and commentary.	New site submitted for consideration at Regulation 19 stage.
Appendix J Cranbrook	Part 2 of 7 Header	Appendix I	Appendix J	Typographical error.
Appendix J Cranbrook	Part 4 of 7	N/A	New column added for site DPC_23 including scores and commentary.	As per addendum issued with Feb 2021 SA.
Appendix L Benenden	Part 2 of 2 Site LS_40	[4 th sentence] The biodiversity objective scores neutral overall...	[4 th sentence] The biodiversity objective scores negative overall...	Typographical error corrected in line with existing scores.

Section	Paragraph	Current text	Proposed text	Reason for change
Appendix P Horsmonden	Part 3 of 3 Site 355 Site address.	Land adjacent to Goudhurst Road, Horsmonden	Land adjacent to Goudhurst Road, Horsmonden (including PSPC_8)	New site submitted for consideration at Regulation 19 stage which overlaps with site 355.
Appendix P Horsmonden	Part 3 of 3 Site 355 Commentary	A reasonable site let down by a lack of key services and facilities and public transport options as well as the loss of a greenfield site in an historic landscape. There is significant concern about the ability to provide an appropriate means of vehicular access to serve the site.	A reasonable site let down by a lack of key services and facilities and public transport options as well as the loss of a greenfield site in an historic landscape. The negative heritage score reflects impact upon the setting of the Conservation Area.	New site submitted for consideration at Regulation 19 stage which overlaps with site 355.
Appendix P Horsmonden	Part 3 of 3 Site 355 Heritage score	0	0 / -	To better reflect impact upon the Conservation Area.
Appendix R Pembury	Part 5 of 6 Site 444	[contains duplicated text]	[final five sentences deleted]	Typographical error.