

Tunbridge Wells Borough Council Local Plan Examination – Post Initial Findings Consultation: Responses to comments relating to the Sustainability Appraisal Addendum

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Proposed Modifications	Comment Summary	TWBC Response
19-2	Christopher Sims					<p>Relating to proposed site allocation AL/RTW16 Land to the west of Eridge Road at Spratsbrook Farm - Comments on the SA as set out below;</p> <ul style="list-style-type: none"> <u>Air</u> - The proposed changes to the Local Plan do not address air quality issues the proposed development would cause, particularly in relation to the A26. <u>Biodiversity</u> - Not clear on why this site has been referred to as a Biodiversity Opportunity Area and no reference to how the plan will address BNG. <u>Heritage</u> - Proposed changes do not adequately take account if the Ancient Scheduled Monument components of the site and its setting or the Grade II listed farmhouse or the High Rocks iron Age Hill Fort. <u>Landscape</u> - proposed changes do not address the under-evaluation of the landscape value of the site including AONB. <u>Services and facilities</u> - Not clear why this has been scored positively as the development will put increased pressure on existing services and facilities. <u>Travel</u> - Increased traffic on the Eridge Road which is already busy. <u>Water Supply</u> - water supply issues in the area will get worse. <u>Flooding</u> - The farm suffers considerable surface water flooding by drainage from the surrounding arable lands and this will be made worse and has not been addressed. <p>The above considerations conclude that the plan is neither legally compliant or sound.</p>	<p>The site (137) forms part of the earlier Sustainability Appraisal of the Submission Local Plan (document PS 013) and not the most recent Sustainability Appraisal Addendum dated October 2023, consulted upon as part of the latest consultation. As such it is considered that this falls outside the scope of this consultation. The Sustainability Appraisal including its scoring has previously been considered under the Stage 1 hearing session for Matter 1 Legal Compliance, Issue 3: Sustainability Appraisal and the Council's Hearing Statement document reference TWLP/003.</p>
126-5	Margaret Borland					<p>Requesting a factual correction to the Sustainability Appraisal in relation to Site 445 - Mabledon and Nightingale and does not require any policy change.</p>	<p>The Green Belt Stage 3 Addendum (PS 035) explains at Chapter 2 what is considered to be a reasonable alternative site to be assessed through the Green Belt</p>

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						The information in regard to the Green Belt rating is queried as it has changed from the previous GB study and the addendum. Also query why it has been listed as a reasonable alternative when it is both AONB and Green Belt.	Stage 3 Addendum work, and the site assessment methodology.
135-3	Natural England					Sustainability Appraisal; Proposed changes to Policy AL/HA 5: Land to the north of Birchfield Grove, Hawkhurst have not been fully assessed in the updated Sustainability Appraisal.	As noted elsewhere, the site has been promoted through a hybrid planning application (reference number 22/02664) which sought outline consent for the development of up to 70 homes with associated medical centre, parking and landscaping and full planning consent for the creation of a new country park. Members of the TWBC Planning Committee resolved to grant planning permission subject to the completion of a Section 106 agreement, at its meeting on the 8 November 2023. The Section 106 is in progress and following completion, the planning decision notice granting planning consent will be issued. The site allocation policy has been drafted to reflect this. The site, including residential use has previously been assessed in the Sustainability Appraisal (Core Document 3.11) for the Regulation 18 Draft Local Plan, when the site was proposed for a mixed use allocation by policy AL/HA 4 Land at Fowlers Park (part site). At that time it was allocated for approximately 100 dwellings. The proposed amendment now proposes the site for approximately 70 residential units, which is considered non-material in this instance. The site minus residential use was also SA'd in PS 013 for the Submission Local Plan. The revised policy is not considered to alter the SA of the site. It is noted that the site has been re-assessed through the SHELAA (PS 038) including with 70 residential units.
140-2		Cooper Estates Strategic Land	Katherine Miles	Pro Vision		The SA and other evidence base documents show that there are available sites which can meet the full 15 year need and whilst there would be a delay to the adoption of the plan, it is considered that this would be better option to ensure deliverable supply the meets the need. Failure to address needs would also impact on the critical need of housing for older people.	TWBC does not consider there to be other available sites to meet the full 15 year need. Housing need and supply is dealt with at Section 11 of the Development Strategy Topic Paper Addendum (PS 054). To find additional sites to meet the full 15 year need, a further Call for Sites would be needed, thereby delaying adoption of the Local Plan. The

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							Council can demonstrate a 10 year land supply, including housing for older people.
142-2	Emma Lester	Residents Against Ramslye Development				<p>Concern raised with regard to the Sustainability Appraisal in regard to Site AL/RTW16 - Land West of Eridge Road at Spratsbrook Farm in regard to the following;</p> <ul style="list-style-type: none"> • <u>Air</u> -proposed development would have impact on air quality - particularly on the A26. • <u>Biodiversity</u> - Previous reference to the site being a Biodiversity opportunity area but the reference now removed with no explanation as to why. plan does not address BNG requirements. • <u>Heritage</u> - proposed changes do not take into account the Ancient Scheduled Monument of the site and its setting. Also the listed status of Ramslye farmhouse which has a number of important historic features. • <u>Landscape</u> - the changes do not address the undervaluation of the landscape value of the site as opposed to other sites. • <u>Services and facilities</u> - Not clear why it has been scored positively when the increase in population with put pressure on existing services. • <u>Travel</u> - Concern over increased traffic as a result of development, in particular proposed access onto Eridge Road. • <u>Water supply</u> - already water supply issues in the area which will be made worse. • <u>Flooding</u> - Ramslye Farm suffers from flooding and in particular surface water flooding which will be made worse as part of any development. <p>Please note this response was signed by 208 individuals instead of multiple duplicate responses, as agreed with the 'Residents Against Ramslye Development' group'</p>	The site (137) forms part of the earlier Sustainability Appraisal of the Submission Local Plan (document PS 013) and not the most recent Sustainability Appraisal Addendum dated October 2023, consulted upon as part of the latest consultation. As such it is considered that this falls outside the scope of this consultation. The Sustainability Appraisal including its scoring has previously been considered under the Stage 1 hearing session for Matter 1L Legal Compliance, Issue 3: Sustainability Appraisal and the Council's Hearing Statement document reference TWLP/003 .
152-4		Save Capel				Save Capel have made a number of comments on the Sustainability Appraisal and raise the following points;	The Green Belt Stage 3 Addendum (PS 035) explains at Chapter 2 what is considered to be a reasonable

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						<ul style="list-style-type: none"> In its updated, TWBC finds that its earlier findings were accurate, and the Plan does not need updating. For the same reasons set out above in relation to a failure to assess reasonable alternatives to justify GB release, the updated SA should have been updated to contain an assessment of the main strategic options in light of the Inspector's findings. The only new information considered in the SA is the GB study 3b, which is narrow in scope and largely ignores any real and reasonable alternatives. The SA focuses on a limited number of sites contained in the GB study and the land use score for 21 out of 56 sites improved. The methodology applied demonstrates a bias for over-development in Capel Parish in preference to all other areas of the borough and other sites areas were not properly considered as reasonable alternatives. The updated SA is based directly on the GB study 3b and Save Capel considers the new SA to be inadequate and not fit for purpose. 	<p>alternative site to be assessed through the Green Belt Stage 3 Addendum work, and the site assessment methodology.</p> <p>It is noted that in the Initial Findings Letter received November 2022, the Inspector at para 6 questioned only why the Council had not undertaken a Stage 3 Green Belt assessment of 'Reasonable Alternative' sites. Non Green Belt sites have already been robustly assessed through the previous SHELAA assessment work. The Council considers the scope of the Sustainability Appraisal Addendum (PS 037) to be appropriate.</p>
153-7		Fernham Homes	Danielle Dunn			SA Assessments following updated Green Belt studies - The conclusions regarding site 143 in the PS_036 Background Document (SHELAA Sheets for all reviewed Green Belt Sites) are supported.	This is noted.
169-8	Nichola Reay	Paddock Wood Town Council	Troy Hayes	Troy Planning & Design		<p>Sustainability Appraisal (SA) - Legally non-compliant/unsound</p> <ul style="list-style-type: none"> SA is extremely limited in scope of options with not much explanation. Reasonable alternatives not approached with an 'open mind' and SA quickly concludes that Paddock Wood and Tudeley are the only options it can consider. Why should the rejected options from the previous SAs not be looked at again? Furthermore, what is the real difference between suspending the 	<p>The Green Belt Stage 3 Addendum (PS 035) explains at Chapter 2 what is considered to be a reasonable alternative site to be assessed through the Green Belt Stage 3 Addendum work, and the site assessment methodology.</p> <p>It is noted that in the Initial Findings Letter received November 2022, the Inspector at para 6 questioned only why the Council had not undertaken a Stage 3 Green Belt assessment of 'Reasonable Alternative' sites. Non Green</p>

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						<p>examination to carry out a re-evaluation and undertaking an 'early review' of the Local Plan?</p> <ul style="list-style-type: none"> • TWBC has had since November 2022 to find a solution to its unsound strategy and seeking alternative housing locations could have been undertaken during this period • Instead of a range of genuine reasonable alternatives, the SA presents small variations of the same option for Paddock Wood and east Capel- assessing the effects/comparing each of these options is not possible 	<p>Belt sites have already been robustly assessed through the previous SHELAA assessment work. The Council considers the scope of the Sustainability Appraisal Addendum (PS 037) to be appropriate.</p> <p>An early review of the Local Plan will enable the Plan to be adopted sooner, providing certainty to communities and developers, and will enable the Council to have a five year housing land supply.</p>
174-7	Malcolm Dorrington					[TWBC: the representation letter is the entirely based upon the PWTC Representation Letter processed under the Representation #169, hence to be read accordingly at the Consultation Points of the Representation #169]	This is noted.