

Tunbridge Wells Borough Council

Sustainability Appraisal of the Submission Local Plan

Post Examination Addendum

Part 1 - Development Strategy and
Strategic Sites

October 2023



Document History

The following tables record the various Sustainability Appraisal reports that have been produced to date.

Sustainability Appraisal Scoping Report (Stage A)

Date	Title	Content
June 2016	Sustainability Appraisal Scoping Report Consultation Draft	Issue for stand-alone consultation
October 2016	Sustainability Appraisal Scoping Report Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies

Sustainability Appraisal (Stage B/C)

Date	Title	Content
May 2017	Sustainability Appraisal Assessment Report Issues and Options Stage Consultation Draft	Issue for consultation alongside Local Plan Issues and Options Report
Dec 2017 and May 2019	Sustainability Appraisal Assessment Report Issues and Options Stage Final Report	Updated following consultation with statutory bodies and other interested parties, and consideration of new studies. Latest update includes minor changes.

Date	Title	Content
July 2019	Sustainability Appraisal of the Draft Local Plan Consultation Draft	Issue for consultation alongside Draft Local Plan Report
Feb 2021	Sustainability Appraisal of the Reg 19 Pre-Submission Local Plan Consultation Draft	Issue for consultation alongside the Reg 19 Pre-Submission Local Plan

Sustainability Appraisal (Stage C/D)

Date	Title	Content
Oct 2021	Sustainability Appraisal of the Submission Local Plan Submission Draft.	Issue for submission alongside the Submission Local Plan
March 2022	Sustainability Appraisal of the Submission Local Plan Submission Draft.	Reissued to correct two minor errors on Table 12 identified during the Examination process.
Oct 2023	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 1 – Development Strategy and Strategic Sites This report.	Addendum to address additional work required on strategic site policies and the implications for the development strategy.

Date	Title	Content
TBC – in progress	Sustainability Appraisal of the Submission Local Plan Post Examination Addendum Part 2 – Main Modifications	Addendum to address the need for Main Modifications following the Examination.

Contents

.....	1
Document History.....	2
1.0 Introduction	1
1.1 Local Plan Overview	1
1.2 Sustainability Appraisal Background.....	2
2.0 Legal Compliance	5
2.1 The SEA Directive.....	5
2.2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010.....	5
3.0 Methodology.....	7
3.1 Updates to Baseline Data	7
3.2 Updates to Plans, Policies and Programmes.....	9
3.3 Sustainability Objectives and Scoring Method	11
4.0 Screening of the Updates to Baseline Data and Evidence Studies	13
4.1 Background.....	13
4.2 Green Belt Studies.....	13
4.3 Strategic Site Studies.....	20
5.0 SA Assessments following updated Green Belt studies.....	22
6.0 SA assessments following updated Development Strategy Options	33
6.1 Tudeley Village	33
6.2 Paddock Wood Town Extension	36
6.3 Overall Development Strategy	43

1.0 Introduction

1.1 Local Plan Overview

1.1.1. The new Local Plan prepared by Tunbridge Wells Borough Council (TWBC) sets out the policies and plans to guide the future development of the borough in the period 2020 - 2038. It identifies the scale of development and the key locations that will be used to meet this need including:

- a spatial vision for the borough and strategic objectives to achieve that vision.
- a development strategy to provide:
 - a framework for the allocation of sites for specific uses (for example, housing and business use)
 - the context for designating areas where specific policies will apply, either encouraging development to meet economic and/or social objectives or constraining development in the interests of environmental protection.
- other strategic policies to also guide both place shaping and development management policies.
- Place Shaping Policies, including both parish/settlement strategies and site-specific allocations and policies for development of identified sites including urban extensions and a garden settlement.
- Development Management policies to shape the form of development at application stage both for sites allocated in the Local Plan and other sites that come forward during the plan period.

1.1.2. After consultation and review, the Local Plan was submitted for Examination in November 2021 and examination hearings were undertaken in 2022 in two stages. Stage 1 addressed matters of legal compliance including the Duty to Cooperate, the Sustainability Appraisal and Habitats Regulations, and Stage 2 considered issues relating to soundness.

1.1.3. Following examination, the Inspector issued a letter in November 2022, confirming the additional work the Council would need to undertake on the strategic sites in order to make the plan sound and adoptable. The Inspector's concerns for Tudeley Village most notably related to:

- accessibility by sustainable modes of transport,
- the ability to successfully mitigate against serious impacts on the highway network,
- the suitability and deliverability of the proposed Five Oak Green bypass;
- the ability of the site to deliver housing at the rate and scale envisaged by the Plan; and,
- the lack of exceptional circumstances needed to justify removing the strategic site from the Green Belt.

- 1.1.4. Further work was also recommended on the strategy for Paddock Wood to overcome concerns with flood risk and the provision of infrastructure, notably secondary school education.
- 1.1.5. This Part 1 Addendum report identifies the implications of this additional work on the Sustainability Appraisal that accompanied the [Submission Local Plan](#), particularly on the Plan's overall development strategy.
- 1.1.6. A further 'Part 2 Addendum' report will address all further matters discussed at Examination which require consideration of Main Modifications. It is envisaged that this will be published following consideration of the suggested development strategy revisions.

1.2 Sustainability Appraisal Background

- 1.2.1 A Sustainability Appraisal (SA) is required during the preparation of a Local Plan by the Planning and Compulsory Purchase Act 2004 to ensure compliance with the requirements of the Strategic Environmental Assessment Directive. Its purpose is to help the Local Authority assess how effectively the Local Plan contributes to sustainable development.
- 1.2.2 There are five key stages in the preparation of a Sustainability Appraisal that are carried out alongside the preparation of a Local Plan (see Figure 1).

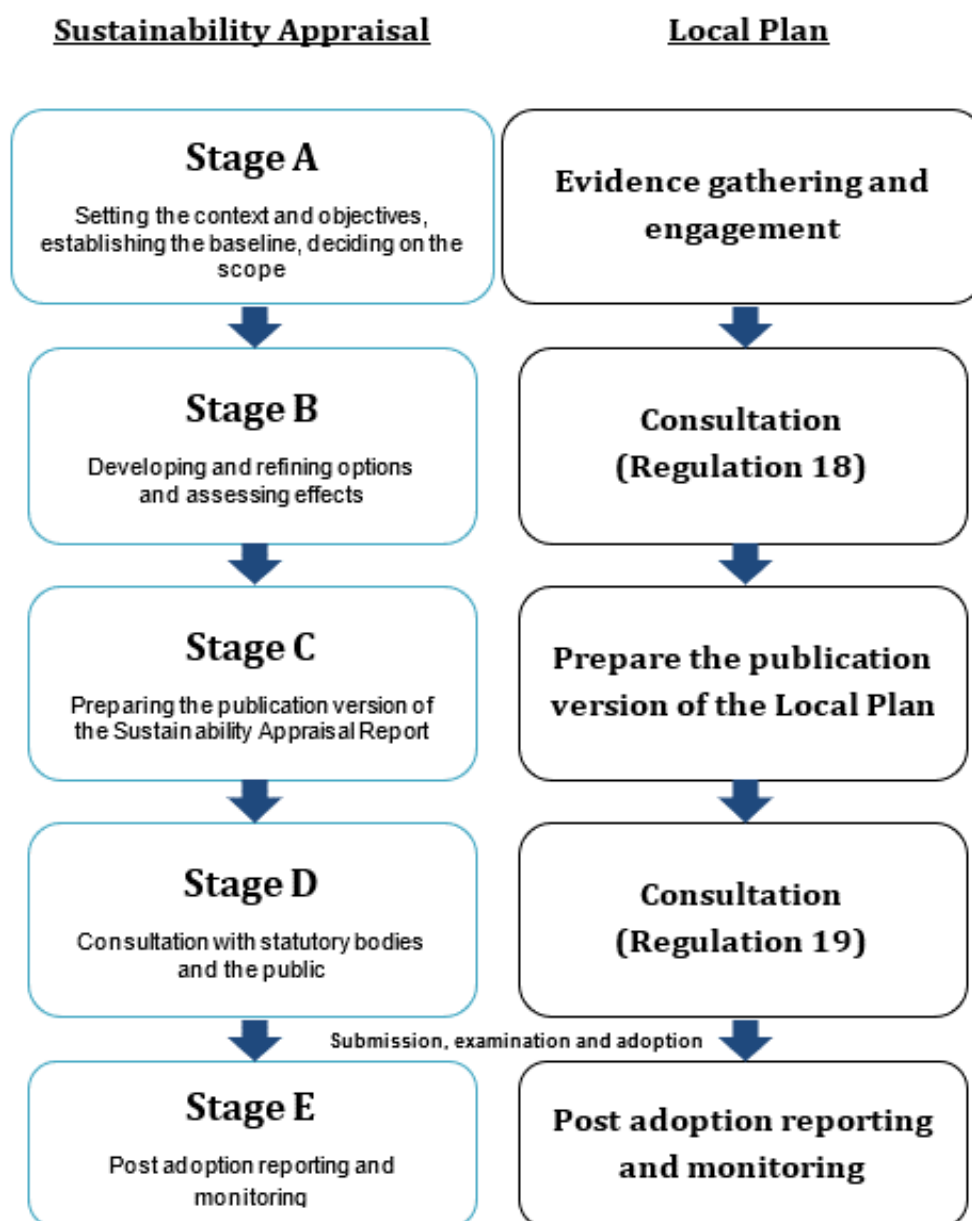


Figure 1. Key stages of Local Plan preparation and the relationship with the SA process. (Adapted from Planning Practice Guidance Reference ID: 11-013-20140306.)

- 1.2.3 Stage A of the sustainability appraisal process was undertaken in 2015-16 and resulted in the production of a Scoping Report that was consulted on in June 2016. The report was then updated to take into account consultees' comments and a final version prepared in October 2016. The Stage A Scoping Report should be referred to for a description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this report. Updates to these descriptions are also provided in Chapter 0 of this report.
- 1.2.4 The Stage B of the sustainability appraisal process began in 2017 and was summarised initially with the production of the Issues and Options Stage Sustainability Appraisal.

- 1.2.5 As options were continually developed and refined, an SA report to accompany both the Draft (Regulation 18) and Pre-Submission (Regulation 19) Local Plans were prepared in July 2019 and February 2021 respectively. Views from statutory consultees and other interested parties were sought throughout the Sustainability Appraisal process.
- 1.2.6 Finally, the SA was updated one last time in October 2021 as the Local Plan was prepared for submission for examination - a report which represented the end of Stage D. The latest version of this document can be found in the Examination Library as document reference [CD PS 013](#).

2.0 Legal Compliance

2.1 The SEA Directive

- 2.1.1. The Sustainability Appraisal process associated with the production of the new Local Plan incorporates the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the “Strategic Environmental Assessment Regulations”), which implement the requirements of the European Directive 2001/42/EC (the “Strategic Environmental Assessment Directive”) on the assessment of the effects of certain plans and programmes on the environment. The Planning and Compulsory Purchase Act 2004 requires that a Sustainability Appraisal (SA) is used to implement the legal requirements of the SEA regulations (whilst also considering economic and social impacts).
- 2.1.2. It is noted that the UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). This established a transition period for retaining the body of existing EU-derived law within our domestic law, including the SEA Regulations. At the time of writing, the Retained EU Law (Revocation and Reform) Bill, which sets out a deadline for the transition period of 31st December 2023, was undergoing readings in the House of Commons. The Bill proposes that EU-derived law no longer apply after this date.

2.2 The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010

- 2.2.1. The Conservation (Natural Habitats, &c.) (Amendment) Regulations 2010, collectively referred to in this report as the Habitats Regulations, implements the Habitats Directive in England & Wales. Under the Habitats Regulations any plan or project likely to have a significant adverse effect upon the integrity of a ‘European site’ must be subject to an appropriate assessment to determine the implications for the designated site in view of its conservation objectives. ‘European sites’ are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within a European context. They consist of Special Areas of Conservation (SAC) designated under Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora and Special Protection Areas (SPA) designated under Council Directive 2009/147/EC on the Conservation of Wild Birds.
- 2.2.2. Under the Habitats Regulations the Council, as the competent body, must determine if the Local Plan is likely to have a significant effect on the biodiversity of a European site, either alone or in combination with other plans or projects. If significant effects are predicted, then an appropriate assessment of the implications for the site in view of its conservation objectives must be undertaken.
- 2.2.3. As explained in paragraph 2.1.1, the UK left the EU on 31st January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act

2020 (“the Withdrawal Act”) which retains EU law. The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for Habitats Regulations Assessments (HRA) will continue after the end of the Transition Period. However, the Retained EU Law (Revocation and Reform) Bill, which sets out a deadline for the transition period of 31st December 2023, draws this into question. For the purposes of this report, it is assumed that any legal change would occur after the adoption of this Local Plan.

- 2.2.4. The main SA report sets out the findings of the HRA process in detail. In summary, an Appropriate Assessment, has been undertaken which looks at the potential effects of the policies contained in the Local Plan on the nearest European site – the Ashdown Forest. In this regard, all of the allocations and policies in the Local Plan were assessed for potential conflicts with this European site.
- 2.2.5. The HRA identified two potential linking pathways that could result in adverse effects upon the Ashdown Forest SAC and SPA that could act in combination with other projects and plans: recreational pressure and traffic-related air quality. However, the projected development outlined in the Local Plan (either alone or in combination with other plans) is expected to result in a negligible impact on both of these sources of impact.
- 2.2.6. The modified development strategy now being proposed by the Council has been subject to a further HRA. Its conclusions, namely that these modifications do not change the findings above, has informed this Addendum report.

3.0 Methodology

3.1 Updates to Baseline Data

- 3.1.1. The Sustainability Appraisal is a dynamic process that is continuously adapted or updated as more data or evidence becomes available.
- 3.1.2. As part of the scoping exercise, a baseline review of the environmental, social and economic issues relevant to Tunbridge Wells borough was undertaken and a further update was undertaken in 2021.
- 3.1.3. Table 1 below provides a list of additional relevant evidence studies that became available for consideration following publication of the Sustainability Appraisal for the submission Local Plan in Oct 2021. The implication of these studies for the baseline data underlying the Sustainability Appraisal is considered.

Table 1. New evidence studies and implications for the SA.

Evidence	Source	Completion Date	Overview	Implication for the SA
Ashdown Forest Practise Note	External consultant commissioned by TWBC	Feb 2022	Updated note to include expectation for SANG and SAMMS contributions.	SA method or baseline data does not need updating. There are no allocated sites within the 7km protection zone so scores cannot be improved.
Sensitivity Test Model and Technical Note (Addendum to Transport Assessment)	External consultant commissioned by TWBC	March 2022	Report finds that the modelling carried out at Reg 19 stage (March 2021) remains valid and robust.	The SA method or baseline data does not need updating.
Green Belt Stage 3 Addendum Report and assessment of the Colts Hill Bypass, and Zone of Theoretical Visibility (ZTV)	External Consultants commissioned by TWBC	May, Sept and Oct 2023	Further assessment of impacts of reasonable alternative sites, also taking account of potential mitigations.	Need to review SA assessments of sites where there is a revised Green Belt harm rating.

Evidence	Source	Completion Date	Overview	Implication for the SA
Colts Hill Bypass				
Tudeley Village - Red, Amber Green (RAG) Assessment	External Consultant commissioned by TWBC	May 2023	Report that advises on the likelihood of the Inspector's concerns about Tudeley Village being capable of being resolved and the time (and cost) for additional work.	Report concludes that there are some 'red' as well as 'amber' assessments in relation to the Inspector's areas of concern. It gives rise to a need to consider significant changes to the development strategy and thus a new SA assessment will be required.
EiP Options - Transport Modelling and Flood Risk Modelling	External Consultant commissioned by TWBC	August - October 2023	To model the transport implications of the options outlined by the Inspector, also taking account of further work on growth options, as well as updated forecasting.	Findings taken into account during new SA assessment within this Part 1 report.
Paddock Wood Master-planning Addendum report	External Consultant commissioned by TWBC	October 2023	To re-evaluate Option 3 of earlier work, also taking account of potential removal of new garden village and further flood modelling and sustainable transport evidence.	Report concludes that scale of growth at Paddock Wood should be reduced. A review of existing SA assessments for spatial growth options will be required.

Evidence	Source	Completion Date	Overview	Implication for the SA
Development Strategy Topic Paper	TWBC	October 2023	Updated following Inspector's concern that Tudeley Village does not meet the 'exceptional circumstances' green belt test.	Further investigations are inconclusive in terms of meeting the green belt test so further options that both include and exclude Tudeley Village need to be assessed by the SA and findings fed back into this Topic Paper.

3.2 Updates to Plans, Policies and Programmes

3.2.1. The tables below provide a list of key national, regional and local plans, policies and programmes that became available for consideration since publication of the Scoping Report in 2016, or an update to a previously identified plan. There have been no changes to international plans, policies and programmes in this time frame.

Table 2. Additional key national plans, policies and programmes

Title	Date	Purpose	Implication for SA
NPPF	Sept 2023	Facilitate onshore wind energy developments.	Not directly relevant to development strategy options
Levelling Up and Regeneration Act	Royal Assent Oct 2023	Bill is wide-ranging and includes an aim to speed up consents for major infrastructure and revise environmental assessments.	Potential for significant impact upon the SA approach and methodology but changes unlikely to be implemented during the Examination of this Local Plan. Will be kept under review.
Building Regulations Part L	June 2022	Introduces more stringent energy reduction standards.	New expectation has implications for the climate change ambition of the Local Plan and has direct impact upon policy EN3 which must now be rewritten.
The Environment Act	Royal Assent Nov 2021	New Act to manage the impact on human activity on the environment, creating a more sustainable and resilient economy and enhancing well-being and quality of life. Key aspects include air quality, water, waste and resources and biodiversity including the concept of net gain.	This Bill has been considered by the SA process as it progressed towards gaining Royal Assent. The new legal requirement for BNG has the most significant implication for the SA.

Table 3. Updates to key local plans, policies and programmes

Title	Date	Purpose	Implication for SA
Neighbourhood Development Plans	At various stages throughout borough. The NDPs for Hawkhurst, Lamberhurst, Benenden, Brenchley & Matfield, Goudhurst, Pembury, Paddock Wood and Cranbrook and Sissinghurst have now been “made”. NDPs for Capel, Sandhurst and Southborough parishes are at earlier stages, with Capel being the most advanced.	Contain various policies offering landscape protection and guidance on development design, community infrastructure and travel.	No update needed. All made NDPs have been screened for SEA and HRA and found not to have likely significant effects (except Benenden which has allocations that mirror the Local Plan).

3.3 Sustainability Objectives and Scoring Method

3.3.1. At scoping stage, 19 sustainability objectives were identified. These are summarised in Table 4.

Table 4. Sustainability Objectives for Tunbridge Wells Borough

Num.	Topic	Objective
1	Air	Reduce air pollution
2	Biodiversity	Protect and enhance biodiversity and the natural environment
3	Business Growth	Encourage business growth and competitiveness
4	Climate Change	Reduce carbon footprint and adapt to predicted changes
5	Deprivation	Reduce poverty and assist with regeneration
6	Education	Improve educational attainment and enhance the skills base
7	Employment	Facilitate and support employment opportunities
8	Equality	Increase social mobility and inclusion
9	Health	Improve health and wellbeing, and reduce health inequalities
10	Heritage	Protect and enhance cultural heritage assets
11	Housing	Provide sufficient housing to meet identified needs
12	Land use	Protect soils, and reuse previously developed land and buildings
13	Landscape	Protect and enhance landscape and townscape
14	Noise	Reduce noise pollution
15	Resources	Reduce the impact of resource consumption

Num.	Topic	Objective
16	Services & Facilities	Improve access and range of key services and facilities
17	Travel	Improve travel choice and reduce the need to travel by private vehicle
18	Waste	Reduce waste generation and disposal
19	Water	Manage flood risk and conserve, protect and enhance water resources

3.3.2. Main modifications proposed to both the supporting text and the main policy were considered.

3.3.3. As for the original SA process, to provide an indication of how well the main modification for policy, strategy or site contributes to each of sustainability objectives, the original score determined from an eight-point scale of impact as shown in Figure 2 was considered and amended where necessary.

Unknown or Mixed	Very Negative	Negative	Slightly Negative	Neutral	Slightly Positive	Positive	Very Positive
?	---	--	-	0	+	++	+++

Figure 2. Eight-point scale of impact used to determine Sustainability Appraisal scores.

3.3.4. Where the main modifications created multiple changes to individual sustainability objectives, the process for determining an overall score followed was the same way as that for when scores across the various decision-aiding questions varied. Namely:

- An equal number and magnitude of positive, negative and neutral changes did not change the original score
- Where the majority of changes were positive, negative or neutral, the overall original score was adjusted in a positive, negative or neutral score direction overall
- A large number of unknown or mixed changes would be scored as unknown/mixed score overall.

3.3.5. A detailed explanation of the scoring method is provided in the [submission version of the SA report](#) (2021).

4.0 Screening of the Updates to Baseline Data and Evidence Studies

4.1 Background

4.1.1. To determine which of the updates to baseline data and evidence studies described in Table 1 would be likely to have significant effects on the environmental, social and economic elements considered by the SA and/or have potential to alter the SA scores, a screening exercise was undertaken for each of the applicable updated studies. Key studies are addressed below.

4.2 Green Belt Studies

- 4.2.1. Below summarises this process in relation to the new Stage 3 Green Belt Study and RAG assessments which now includes a consideration of the 'reasonable alternative' sites as defined by the SEA Regs and detailed in Chapter 8 of the SA Report for Examination.
- 4.2.2. The Council has analysed the new additional assessments and made a judgement as to which sites have undergone a material change in scoring since the Stage 2 assessment was carried out.
- 4.2.3. Where sites that had undergone a material change were assigned a lower (more positive) score in the Stage 3 assessment when compared to Stage 2, the SA screening exercise was undertaken. Where scores were unchanged or increased (worsened) between Stage 2 and Stage 3, no further SA work was undertaken, as this was considered unlikely to affect the decision not to allocate these reasonable alternative sites.
- 4.2.4. A similar process was adopted when considering the implications on the sustainability appraisal for these sites. Only sites where the Stage 3 assessment caused a Stage 2 score to transition/improve by two step changes, were considered to have undergone a significant change worthy of a reassessment by the sustainability appraisal scoring process. This process is summarised in the tables below for each of the relevant parishes and settlements.

Table 5. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Royal Tunbridge Wells.

Site	Description	Implication for the SA
30	Land at Caenwood and Whitegates Farm Now separated into northern and eastern fringes. Score revised from Very High at Stage 2 to High at Stage 3 (for both).	Unlikely to be significant*.
39	Land adjoining Dunorlan Park Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant*.

Site	Description	Implication for the SA
53	Plot B: Land to east and north of allotments Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant*.
73	Land at Pembury Rd (south) Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.
99	Land at Pembury Rd Now separated into three parcels. Score revised from High at Stage 2 to three parcels with High and Moderate High at Stage 3 for both.	Unlikely to be significant.
114	Land at Sandown Park west of A21 Score revised from High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant.
165	Pantiles Car Park Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant*.
359	Land east of Halliwell Nursing Home Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant*.
400	Land east of Halliwell Nursing Home Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant*.
411	Land at Sandown Park between Pembury grange and A21 Now separated into two parcels. Score revised from High at Stage 2 to two parcels of High and Moderate High at Stage 3.	Unlikely to be significant*.
434	Tuttys Farm, Hawkenbury Score revised from High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant.

4.2.5. In summary, 3 of the 11 updates to reasonable alternatives in Royal Tunbridge Wells are likely to result in a significant implication for the SA.

4.2.6. All the above sites require an update to commentary to reflect the new score. Sites marked with an asterisk also require a change to the commentary to remove reference to a wider parcel.

Table 6. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Southborough

Site	Description	Implication for the SA
445	Mabledon and Nightingale Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.

4.2.7. In summary, none of the updates to reasonable alternatives in Southborough are likely to result in a significant implication for the SA.

Table 7. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Capel parish including Five Oak Green.

Site	Description	Implication for the SA
11	Land at and rear of Whetsted Road Score revised from Moderate at Stage 2 to Low Moderate at Stage 3.	Unlikely to be significant*
143	Land at Tolhurst Road Score revised from Moderate at Stage 2 to Low at Stage 3.	Potential to be significant
216	Land at Mote Farm Score revised from Very High at Stage 2 to Low Moderate at Stage 3.	Potential to be significant
331	Forstal Field, Finches Farm Score revised from Moderate at Stage 2 to Low at Stage 3.	Potential to be significant
387	Capel Grange Lodge, Badshell Road Score revised from Very High at Stage 2 to Moderate at Stage 3.	Potential to be significant
440	The Old Vicarage, Five Oak Green Rd Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Potential to be significant
447	Land east of A26, Alders Wood Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.
450	Parcel 1. West of Five Oak Green Score revised from High at Stage 2 to Moderate at Stage 3.	Potential to be significant
451	Parcel 2. West of Five Oak Green Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant*

Site	Description	Implication for the SA
452	Land south of Tudeley Rd Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Potential to be significant
453	Land off Hartlake Rd Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Potential to be significant
LS_12	Land south side Five Oak Green Rd (previously grouped with FS_9) Score revised from Very High at Stage 2 to Low Moderate at Stage 3.	Potential to be significant
FS_6	Orchard Cottage, Church Lane Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.
FS_9	Land south of B2017 (previously grouped with LS_12) Score revised from Very High at Stage 2 to Low Moderate at Stage 3.	Potential to be significant

4.2.8. In summary, 10 of the 14 updates to reasonable alternative sites in Capel parish are likely to result in a significant implication for the SA. The consequent assessment of significance is found within Chapter 0.

4.2.9. In addition to the reasonable alternative sites above, Site LS_29 (Land at Sychem Lane) and requires an update within the SA as follows.

A site that scores several neutrals and some positives. It is currently constrained by the lack of suitable pedestrian access to the settlement, but it is likely this could be overcome. It is let down on its land use and landscape score reflecting the loss of a greenfield site located within the Green Belt ~~being the significant extent of parcel FG3 which~~ **the release of which scores** moderately in the Green Belt Study. A large part of the site is also agricultural Grade 2 which influences this score. This site would have a negative impact on the landscape setting of the settlement and whilst some parts of the site are closer to the services and facilities of the settlement, some parts are less accessible.

4.2.10. Similarly, commentary for reasonable alternative site numbers 11 and 451 marked with an asterisk in Table 7 now refer to the updated green belt harm score for the site and delete reference to the larger parcel.

4.2.11. On the topic of the Colts Hill Bypass, an updated Green Belt assessment has been completed in Sept 2023 that concludes this transport option to be inappropriate and with potential to cause moderate harm. These findings align with assumptions made by the submission SA and thus no change in Land Use score is required.

Table 8. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Pembury parish.

Site	Description	Implication for the SA
64	Land at Woodside House Score revised from High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant.
190	Land south east of Sandhurst Avenue Score revised from Moderate at Stage 2 to two parcels of Moderate and High at Stage 3.	Unlikely to be significant.
191	Land north of Henwoods Mount Score revised from High at Stage 2 to Moderate at Stage 3.	Potential to be significant.
241	Land south east of Sandhurst Avenue Consisted of two parcels that were combined within SA and scored at Stage 2 as Moderate & High. At stage 3, both assessed as Moderate.	Potential to be significant
290	Abbots, Woodside Close Score revised from High at Stage 2 to Moderate at Stage 3.	Potential to be significant.
332	Priory Farm Score revised from High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant.
354	Stone Court Farm Score revised from High at Stage 2 to Moderate at Stage 3.	Potential to be significant.
367	Land to the southwest of Woodside Score revised from High at Stage 2 to Moderate High at Stage 3.	Unlikely to be significant.
379	Land at Henwood Green Road Now separated into two parcels 1) Score revised from High at Stage 2 to Moderate at Stage 3. 2) Score revised from High at Stage 2 to Moderate High at Stage 3.	Parcel 1 potential to be significant. Parcel 2 unlikely to be significant.
444	Land to the north of TW Hospital Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.

4.2.12. In summary, 6 of the 10 updates to reasonable alternative sites in Capel parish are likely to result in a significant implication for the SA. The consequent assessment of significance is found within Chapter 0.

4.2.13. In addition to the reasonable alternative sites considered above, sites 332, 373 and 375 require updates within the SA.

- 4.2.14. Reasonable alternative site number 332 (Priory Farm, Pembury) has an error in the commentary relating to Green Belt Study scoring. This should be corrected as follows:

Negative land use score is influenced by the loss of Green Belt (~~high harm and very moderate~~ **moderate** high harm) and greenfield land, with grade 3 soils in an historic landscape in the AONB. Housing in this location would not suit older people (distant from services). Air quality scores negatively largely due to the distance to local services.

- 4.2.15. Commentary for reasonable alternative site number 367 (Land southwest of Woodside House, Pembury) now refers to the scoring for the site rather than the larger parcel as follows:

A site that scores mostly neutrals, which is let down on land use and landscape grounds, containing a significant chunk of Ancient Woodland in the AONB, and its location relative to key services and facilities. Land use score influenced by grade 3 agricultural soils and location in Green Belt ~~parcel PE3 (moderate high harm), adjusted to reflect that site is part of this wider parcel.~~

- 4.2.16. Reasonable alternative site number 373 (Land at Downingbury Farm, Pembury) has an error in the commentary relating to Green Belt Study scoring. This should be corrected as follows:

Site scores a number of neutrals and some positives. Its location adjacent to the A228 influences the air quality and noise scores given. The site forms part of the setting of an historic farmstead which has influenced the heritage score given as well as being adjacent to listed buildings. The site is parcel PE5 (moderate harm) if released from the Green Belt which along with grade 3 agricultural soils and greenfield nature of the site has informed the land use score. The negative landscape score reflects the loss of a greenfield site in the AONB, and existence of the historic farmstead as well as historic routeways. 2020 MGB Study: Overall Harm Rating is ~~Low~~ **moderate**.

- 4.2.17. The commentary for allocated site 375 (Land at Downingbury Farm, Rowley Hill) required updating as shown below. No change to the Land Use score is necessary.

Green Belt (**low** moderate harm) and greenfield land, with grade 3 soils in the AONB. The heath objective scores slightly positive because of the proposal to safeguard land for hospice expansion. Air quality scores negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred.

- 4.2.18. The commentary for reasonable alternative site 190 (Land south east of Sandhurst Avenue) required updating as shown below. No change to the Land Use score is necessary.

Negative land use score is influenced by the loss of Green Belt (**moderate and high**) greenfield land, with grade 3 soils in the AONB. Landscape scores negative because of location of site relative to historic fields and historic farmsteads within an historic landscape in the AONB. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.

Table 9. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Rusthall parish.

Site	Description	Implication for the SA
22	Dingley Dell Score revised from Very High at Stage 2 to High at Stage 3.	Unlikely to be significant.
146	Tunbridge Wells Golf Club, Langton Road Now separated into four parcels. 1) Score revised from Very High at Stage 2 to Moderate High at Stage 3. 2) Score revised from Very High at Stage 2 to Moderate at Stage 3. 3) Score revised from Very High at Stage 2 to Moderate High at Stage 3. 4) Score revised from Very High at Stage 2 to High at Stage 3.	Parcels 1, 2 and 3 have potential to be significant. Parcels 4 unlikely to be significant.

4.2.19. In summary, 1 of the 2 updates to reasonable alternative sites in Rusthall parish are likely to result in a significant implication for the SA. The consequent assessment of significance is found within Chapter 0.

4.2.20. In addition to the reasonable alternative sites considered above, site 60 (The Paddocks, Home Farm) requires updates within the SA commentary as shown below. No change to the Land Use score is necessary.

A reasonably well-located site adjacent to the settlement, which has a limited range of key services and facilities. This site is let down by impact on the Green Belt, being a greenfield site within a Green Belt parcel which would have moderate **high** harm if released from the Green Belt, informing the land use score.

Table 10. Implications for SA of the findings of the Stage 3 Green Belt Study for reasonable alternative sites in Speldhurst parish including Langton Green.

Site	Description	Implication for the SA
27	(1) Land adjacent to rear Asher Reeds (2) Land adjacent to Cherry Trees Both scores revised from Very High at stage 2 to Moderate at Stage 3.	Potential to be significant.
42	Land at High View Score revised from Very High at Stage 2 to Low Moderate at Stage 3	Potential to be significant.
94	Land at Milford House Score revised from High at Stage 2 to Low at Stage 3	Potential to be significant.

Site	Description	Implication for the SA
337	Allotment land north east of Southwood Road Score revised from High at Stage 2 to Moderate at Stage 3.	Potential to be significant.
338	Land between Ferbies and Ewehurst Lane Score revised from High at Stage 2 to Moderate at Stage 3	Potential to be significant.
386	Ashwood Lodge Farm, Penshurst Rd Score revised from High at Stage 2 to Low Moderate at Stage 3	Potential to be significant.
416	Land north of Langton House Score revised from High at Stage 2 to Moderate at Stage	Potential to be significant.
FS_10	Land at Hollands Farm Now two parcels. (1) Score revised from High at Stage 2 to Moderate High at Stage 3. (2) Score unchanged from High.	Unlikely to be significant.
LS_15	Herons Oast Farm Score revised from Very High at Stage 2 to Moderate High at Stage 3.	Potential to be significant

4.2.21. In summary, 8 of the 9 updates to reasonable alternative sites in Speldhurst parish including Langton Green are likely to result in a significant implication for the SA. The consequent assessment of significance is found within Chapter 0.

4.3 Strategic Site Studies

4.3.1. To determine if draft alterations proposed to strategic sites would be likely to have significant effects on the environmental, social and economic elements considered by the SA and/or have potential to alter the SA scores, a screening exercise was undertaken.

4.3.2. This process is summarised in the sections below in Table 11.

Table 11. Implications for SA of potential modifications to strategic site policies and, as a consequence, to the SA of the overall development strategy.

Policy Aspect	Description	Implication for the SA
(1) Removal of policy STR/SS 3 (Tudeley Village)	Deletion of proposal for a new garden village providing for some 2,800 homes (of which some 2,100 would be within the Plan period) and supporting infrastructure.	<p>Yes.</p> <p>SA assessment required for the new development growth strategy and comparison with previously assessed strategies in Table 26 of the SA report.</p> <p>Cumulative impacts for Capel and Paddock Wood require reassessment (STR/CA 1 and STR/PW 1).</p> <p>SA assessment for STR 9 (Green Belt) requires reassessment, the scores for which are summarised in Appendix E, Table 142 of the SA report.</p>
(2) Reduction in scale and alternative distribution of housing and employment land for Paddock Wood extension (policy STR/SS 1)	The revised draft masterplan now draws on further flood modelling and sustainable transport evidence, as well as accommodating a new secondary school.	<p>Yes.</p> <p>SA assessment required for the new development growth strategy options drawing on new studies available.</p> <p>Cumulative impacts for Capel and Paddock Wood require reassessment (STR/CA 1 and STR/PW 1).</p>

4.3.3. As can be seen in Table 11, all of the modifications to the strategic site policies were found to have potential to alter the existing SA scores and therefore the overall development strategy (see further discussion in section 6.3).

5.0 SA Assessments following updated Green Belt Studies

- 5.1.1. Following the screening exercise in Chapter 4, it was determined that the findings of the Stage 3 Green Belt assessment had potential implications for the SA assessment for 21 out of 56 sites in total. The updated SA Scoring Tables are shown in the tables below for each relevant parish.
- 5.1.2. The revised SA work finds that the allocated sites proposed in the Local Plan compare favourably in terms of harm rating with the reasonable alternative sites in that they generally have lower harm ratings (with the obvious exception of Tudeley Village and land at east Capel).
- 5.1.3. Therefore, the further Green Belt assessments do not provide a basis for concluding that other previously rejected “omission sites” should come forward into the Local Plan, save for a couple of possible exceptions. Hence, it does not suggest any significant new development strategy options.
- 5.1.4. Notwithstanding this general finding, there are a few sites at Five Oak Green where the harm is Moderate to Low, which is comparable in Green Belt harm terms to some allocated sites.

Table 12. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Royal Tunbridge Wells.

Sustainability Objective	Site 39	Site 359	Site 400
Air	0 / +	0 / +	0 / +
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0 / -
Deprivation	0	0	0
Education	0 / +	0 / +	0 / +
Employment	+	+	+
Equality	+	+	+
Health	0 / +	0 / +	0 / +
Heritage	--	-	- / --
Housing	+	+	+ / ++
Land use	-	-	-
Landscape	-	0	-
Noise	0 / -	0 / ?	0 / ?
Resources	0 / ?	0 / ?	0 / ?
Services & Facilities	++	++ / +++	++ / +++
Travel	+ / ++	+ / ++	+ / ++
Waste	0	0	0
Water	0	0	0
Commentary	<p>SCORE ALTERATION: Land use score improved from - / - - to - .</p> <p>AMENDED COMMENTARY: This site scores mostly neutral scores with some positive ones. It is let down on its heritage score, influenced by the sites location in the Tunbridge Wells Conservation Area and being adjacent to Dunorlan Park, an Historic Park and Garden. Part of the site has archaeological potential which influences this score too. The site is a greenfield site and a small part of a larger Green Belt parcel the release of which would cause very moderate high harm. The score for land use has been adjusted to reflect the size of the site. The negative landscape score is influenced by the impact the site has on the setting of the landscape whilst the negative score for noise has been informed by the sites position along the Pembury Road.</p>	<p>SCORE ALTERATION: Land use score improved from - / - - to - .</p> <p>AMENDED COMMENTARY: This site scores mostly neutral scores with some positive ones. It scores negatively on heritage due to it being adjacent to an historic park and garden and adjacent to an area of archaeological potential. The site is a greenfield site and a small part of a larger Green Belt parcel the release of which would cause very moderate high harm. The score for land use has been adjusted to reflect the size of the site. The negative score for noise has been informed by the sites position in close proximity to the Pembury Road.</p>	<p>SCORE ALTERATION: Land use score improved from - / - - to - .</p> <p>AMENDED COMMENTARY: This site scores mostly neutral scores with some positive ones. It scores negatively on heritage due to it being adjacent to the Conservation Area, forming part of its setting and adjacent to an historic park and garden and area of archaeological potential. The site is a greenfield site and part of a larger Green Belt parcel the release of which would cause very moderate high harm. The score for land use has been adjusted to reflect the size of the site. The negative score for noise has been informed by the sites position in close proximity to the Pembury Road.</p>

Table 13. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Capel parish. Part 1 of 3.

Sustainability Objective	Site 143	Site 216	Site 331
Air	0	0	-
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	?/-
Deprivation	0	0	0
Education	0/+	0/+	0/+
Employment	+	+	+
Equality	+	0/+	0/-
Health	0	0	0
Heritage	0	-	-/--
Housing	+	+	++
Land use	-	0/-	-/--
Landscape	0/-	-	-/--
Noise	0	-/--	-/--
Resources	0/?	?/-	0/?
Services & Facilities	0/+	0/+	0/-
Travel	0/+	0/+	0/+
Waste	0	0	0
Water	0/-	0/-	0/-
Commentary	<p>SCORE ALTERATION: Land use score improved from -/-- to -.</p> <p>AMENDED COMMENTARY: A reasonable site that scores a mix of neutrals and positives. It is let down on its land use score, being a Green Belt site within a larger parcel that would cause moderate harm if released. Land Use score reflects greenfield site with grade 3 soils with low level of harm if site was released from the Green Belt.</p>	<p>SCORE ALTERATION: Land use score improved from -/-- to 0/-.</p> <p>AMENDED COMMENTARY: Site scores a number of neutrals with some positives, let down by its heritage score in close proximity to three historic farmsteads and on land use and landscape scores, being the loss of a greenfield site part of a broader parcel that makes a very high contribution to the Green Belt. Landscape and noise being in close proximity to a mainline railway.</p>	<p>SCORE ALTERATION: Land use score improved from -- to -/--</p> <p>AMENDED COMMENTARY: This site receives a mix of scores including neutrals and some positives. It is let down on its noise score because of its location close to the main railway line. Land use also scores a negative as the site is part of a Green Belt parcel the release of which would cause moderate low harm. and for Heritage and Landscape are also negative due to being adjacent to historic farmsteads.</p>

Table 14. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Capel parish. Part 2 of 3.

Sustainability Objective	Site 387	Site 450	Site LS_12 including FS_9
Air	0 / -	-	0 / +
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	? / -	0
Deprivation	0	0	0
Education	0 / +	0	0 / +
Employment	+	+	+
Equality	? / +	0 / -	+
Health	0	0	0
Heritage	0	0 / -	0
Housing	0 / +	++	+
Land use	-	- / - -	- / - -
Landscape	-	- -	- / - -
Noise	-	- / - -	0
Resources	0 / ?	0 / ?	? / -
Services & Facilities	0 / +	0 / -	0 / +
Travel	0 / +	0 / +	0
Waste	0	0	0
Water	0 / -	0 / -	0 / -
Commentary	<p>SCORE ALTERATION: Land use score improved from - / - - to - .</p> <p>No amendment to commentary is necessary.</p>	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: This site scores mostly neutrals with some positive scores. It is a greenfield site in the Green Belt and forms a parcel the release of which would cause high moderate harm to the Green Belt. This influences the land use score. The loss of a greenfield site in the historic landscape, adjacent to an historic farmstead which forms part of the setting of Five Oak Green influences the negative landscape score given.</p>	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: A site that scores several neutrals and some positives. It is let down on its land use and landscape score reflecting the loss of a greenfield site located within the Green Belt being part of a larger broad parcel (score adjusted to reflect this) that would have very high low moderate harm if released from the Green Belt. A large part of the site is also agricultural Grade 2 which influences this score. This site would have a negative impact on the landscape setting of the settlement.</p>

Table 15. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Capel parish. Part 3 of 3.

Sustainability Objective	Site 440, 452, 453
Air	?
Biodiversity	-
Business Growth	+ / ++
Climate Change	- / --
Deprivation	+
Education	+ / ++
Employment	++
Equality	++ / +++
Health	++
Heritage	--
Housing	+++
Land use	---
Landscape	-- / ---
Noise	--
Resources	0 / +
Services & Facilities	++ / +++
Travel	++
Waste	0
Water	?
Commentary	<p>These three sites were considered together as part of an alternative scale of settlement for Tudeley Village. This scale was defined as reasonable alternative Number 3 and consisted of 5,000 new dwellings.</p> <p>SCORE ALTERATION: None</p> <p>Commentary No amendment to commentary is necessary as these three sites make a relatively small contribution to this large reasonable alternative.</p>

Table 16. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Pembury parish. Part 1 of 2.

Sustainability Objective	Site 191	Site 241
Air	0	0
Biodiversity	0	0
Business Growth	0	0
Climate Change	? / -	? / -
Deprivation	0	0
Education	+	+
Employment	+	+
Equality	+	+
Health	0	0
Heritage	0 / -	0 / -
Housing	+ / ++	+ / ++
Land use	- / --	- / --
Landscape	-	- / --
Noise	-	-
Resources	0 / ?	0 / ?
Services & Facilities	0 / -	0 / -
Travel	0	0
Waste	0	0
Water	0 / -	0 / -
Commentary	<p>SCORE ALTERATION: Land use score improved from -- to - / -- .</p> <p>AMENDED COMMENTARY: Negative land use score is influenced by the loss of Green Belt (high moderate harm) greenfield land, with part grade 3 soils in the AONB. The site is also an historic field. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.</p>	<p>SCORE ALTERATION: Land use score improved from -- to - / -- .</p> <p>AMENDED COMMENTARY: Negative land use score is influenced by the loss of Green Belt (moderate harm/high) greenfield land, including grade 3 soils in the AONB and part historic field. The Noise objective scores negatively because residents will be exposed to high noise levels and the site will contribute to a deterioration in the existing noise levels.</p>

Table 17. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Pembury parish. Part 2 of 2.

Sustainability Objective	Site 290	Site 354	Site 379
Air	0	0 / -	0 / -
Biodiversity	0	0	0
Business Growth	0	0	0 / -
Climate Change	? / -	0	? / -
Deprivation	0	0	0
Education	+	+	+
Employment	+	+	+
Equality	0 / -	0 / +	0 / +
Health	0	0	0
Heritage	0	0	-
Housing	0 / +	0 / +	0 / +
Land use	-	- / - -	- / - -
Landscape	0 / -	-	- -
Noise	0	0	0
Resources	? / -	0 / -	- / ?
Services & Facilities	0 / -	0 / -	0 / -
Travel	0	-	-
Waste	0	0	0
Water	0 / -	0 / -	0 / -
Commentary	<p>SCORE ALTERATION: Land use score improved from - / - - to - .</p> <p>No amendment to commentary is necessary.</p>	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: Negative land use score is influenced by the loss of Green Belt (high moderate harm) and part greenfield land in an historic landscape (not in but adjacent to AONB), with grade 2 agricultural soils. Air quality scores negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred. Stone Court Farm Lane will not be user friendly for those with mobility problems.</p>	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: Negative land use score is influenced by the loss of Green Belt (moderate/moderate high harm) and greenfield land, with grade 3 soils in the AONB. Housing in this location would not suit older persons (distant from services) so the housing objective does not score as high as it could. Air quality scores slightly negatively largely due to the distance to local facilities and good local road network meaning private car use will be preferred.</p>

Table 18. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Rusthall parish.

Sustainability Objective	Site 146
Air	-
Biodiversity	- / - -
Business Growth	0
Climate Change	-
Deprivation	0
Education	0 / -
Employment	+
Equality	+
Health	0
Heritage	-
Housing	++
Land use	- / - -
Landscape	- / - -
Noise	- / - -
Resources	?
Services & Facilities	++
Travel	0
Waste	0
Water	0 / -
Commentary	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: This site has mixed scores. Negative score for noise because the site is within the main Gatwick flight path and will result in a large increase of vehicle movements onto a road that already experiences high levels of road noise. Negative land use and landscape scores reflect the loss of greenfield land with complex topography which is ranges in classification as from very-high to moderate value Green Belt. Air quality is scored as negative overall as it was felt that the negative aspects of increased car travel could not be offset by the contributions gained for active travel improvements.</p>

Table 19. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Speldhurst parish. Part 1 of 3.

Sustainability Objective	Site 27	Site 42	Site 94
Air	0	0 / -	-
Biodiversity	0	0	0
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	0 / -	0 / -	0 / -
Employment	+	+	+
Equality	0 / -	0 / -	- / - -
Health	0	0	0
Heritage	0	0	0
Housing	+	+	+
Land use	- / - -	0 / -	0 / -
Landscape	0 / -	0 / -	-
Noise	0	- / - -	-
Resources	0 / ?	0 / ?	0 / -
Services & Facilities	-	-	-
Travel	-	0 / -	-
Waste	0	0	0
Water	0	0	0
Commentary	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: A site with many neutral scores and some positives to housing provision. It is let down by its location relative to key services and facilities and high demand for school provision and on land use where this would result in the loss of a greenfield site in the Green Belt, part of a larger parcel with very high moderate harm, and landscape given the loss of this greenfield site in the AONB.</p>	<p>SCORE ALTERATION: Land use score improved from - to 0 / - .</p> <p>AMENDED COMMENTARY: A site with many neutral scores that scores positive for housing provision and neutral/negative in terms of travel. Its score is let down by demand for school places and land use and landscape impacts, being the loss of a greenfield site in the AONB which forms part of a broader parcel with very high low moderate impact if released from the Green Belt. Score informed however by the fact this is a relatively small site.</p>	<p>SCORE ALTERATION: Land use score improved from - to 0 / - .</p> <p>No amendment to commentary is necessary.</p>

Table 20. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Speldhurst parish. Part 2 of 3.

Sustainability Objective	Site 338	Site 386	Site 416
Air	0 / -	-	0 / -
Biodiversity	-	0	--
Business Growth	0	0	0
Climate Change	0	0	0
Deprivation	0	0	0
Education	---	0 / -	0 / -
Employment	+	+	+
Equality	-	- / --	-
Health	0	0	0
Heritage	--	0	--
Housing	++	+	++
Land use	--	0 / -	- / --
Landscape	--	-	--
Noise	--	-	-
Resources	0 / ?	0 / -	? / -
Services & Facilities	-	-	-
Travel	0 / -	0 / -	0 / -
Waste	0	0	0
Water	0	0	0 / ?
Commentary	<p>SCORE ALTERATION: Land use score improved from -- / --- to --.</p> <p>AMENDED COMMENTARY: The education objective scores slightly negative because the existing primary is in high demand. The equality objective scores negative because selective education choices are easier to access than non-selective, and the distance of the site to Speldhurst facilities may disadvantage disabled persons. Land use score reflects the <u>high-moderate</u> harm that would be caused by loss of the Green Belt, green field land and underlying soils. Bus services from Speldhurst are not regular and some services are lacking. Noise scores negatively because the site is within the main flight path for Gatwick airport. The site is in a sensitive, edge of settlement location within the AONB. The scale is in keeping with the existing settlement but sensitive design will be necessary.</p>	<p>SCORE ALTERATION: Land use score improved from -- to 0 / -.</p> <p>No amendment to commentary is necessary.</p>	<p>SCORE ALTERATION: Land use score improved from -- to - / --.</p> <p>AMENDED COMMENTARY: A site located adjacent to the existing settlement, which scores mostly neutral. It scores positively in terms of housing but negatively on education given the high demand for school place at the Primary School. It also scores negatively for land use, informed by loss of the site in a broader parcel of <u>from the</u> Green Belt the release of which would have very high <u>moderate</u> impact. It scores negatively on landscape reflecting impact upon the AONB. There is a large Local Wildlife Site on the majority of the site which greatly reduce development potential. The site adjoins and risks impacting upon the setting of the Conservation Area.</p>

Table 21. New SA assessments and scores for reasonable alternative sites that were adjusted following the Stage 3 Green Belt study for Speldhurst parish. Part 3 of 3.

Sustainability Objective	Site 337	LS_15
Air	-	0 / -
Biodiversity	0	0 / -
Business Growth	0	0
Climate Change	0	0
Deprivation	0	0
Education	+	0 / -
Employment	+	+
Equality	-	-
Health	0	0
Heritage	0	- / - -
Housing	+	++
Land use	-	- -
Landscape	-	- / - -
Noise	0	-
Resources	? / -	? / -
Services & Facilities	0 / -	-
Travel	-	0 / -
Waste	0	0
Water	0	0 / ?
Commentary	<p>SCORE ALTERATION: Land use score improved from - - / - - - to - - .</p> <p>AMENDED COMMENTARY: A reasonably well located site adjacent to the settlement, which has a limited range of key services and facilities. Let down by impact on the Green Belt (moderate ^{high} impact) and being the loss of a largely greenfield site in the AONB. There is concern about the ability to provide a suitable means of access to this site and the ability of some, less mobile residents to access services and facilities in a safe manner due to lack of suitable pavement. Equality, air and travel scores were downgraded in Pre Submissions version of SA to reflect confirmation of this difficulty for active travel.</p>	<p>SCORE ALTERATION: Land use score improved from - - to - / - - .</p> <p>AMENDED COMMENTARY: A site located adjacent to the existing settlement, which scores mostly neutral. It scores positively in terms of housing but negatively on education given the high demand for school place at the Primary School. It also scores negatively for land use, informed by loss of the site in a broader parcel of ^{from the} Green Belt the release of which would have very ^{moderate} high impact. It scores negatively on landscape reflecting the loss of primarily greenfield land in the AONB, its location adjacent to an historic farmstead and an historic routeway (road).</p>

6.0 SA assessments following updated Development Strategy Options

6.1.1. Following the screening exercise in Chapter 4.3, it was determined that both elements in Table 11 had potential implications for the SA. These are assessed in turn below.

6.1 Tudeley Village

6.1.2. The sustainability appraisal of Tudeley Village will be reviewed in light of the further work, but the further investigations are generally not regarded as challenging earlier evidence.

6.1.3. However, there are some areas where further work may be seen to have a material bearing on SA Objectives. These relate to:

- Housing Objective – Delivery, and hence its contribution to supply, is reduced by about a third in the plan period (due to the extended examination of the Local Plan, as well as due to adopting a more cautious lead-in programme),
- Air Objective – uncertainties raised by Inspector are acknowledged, but these were already recognised in the sustainability appraisal,
- Landscape Objective – There is an acknowledgement of the uncertain ability to avoid significant landscape harms from the Five Oak Green Bypass, although it was already rated as negative in the transport links sustainability appraisal (PSLP SA Table 32),
- Although the Inspector is not certain about the effectiveness of proposed cycle route or of emerging bus routes, there is now more evidence on bus proposals which support the SA Travel scores, albeit their effect on travel patterns is not guaranteed.

6.1.4. In conclusion, the SA for Tudeley Village, as contained in the Submission Local Plan, has been reconsidered in light of the above respects. The revised alternative for Tudeley Village (known as SS3 Revision A) represents a similar distribution as that described in the Pre-Submission Local Plan but with delivery of fewer dwellings within the plan period (approximately 1,450). This is equivalent to two-thirds of the previous estimate and, in terms of quantitative housing numbers, is most similar to “Option 1” considered within the Pre-Submission Local Plan SA as follows:

- development of approximately 1,500 dwellings
- dwellings located to the south of the railway line and in line with the minimum advocated size of a garden settlement.

6.1.5. A review has been completed of each of the SA objectives to determine if the scores for Option 1 can also be applied to SS3 revision A, and this has largely been found possible. A comparison of Option 1 and SS3 Revision A is shown

in Table 22 below. It can be seen that slight worsening of scores are predicted for SS3 Revision A for the Housing objective, whereas slight improvements are predicted for the Land Use, Noise and Water objectives.

- 6.1.6. The cumulative impacts of this change have also been considered and it has been determined that the marginal nature of the altered scores would not trigger a change to cumulative scores recorded in Tables 50 and 52 of the SA report nor the scores for STR 9 (Green Belt) which are summarised in Appendix E of the SA report.

Table 22. New SA assessments and scores for SS3 Revision A.

Sustainability Objective	SS3 for Sub LP (2,800 dwellings)	SS3 Revision A (1,450 dwellings)	Commentary
Air	?	?	See Table 28 of the SLP SA.
Biodiversity	0 / -	0 / -	See Table 28 of the SLP SA.
Business Growth	+	+	See Table 28 of the SLP SA.
Climate Change	-	-	See Table 28 of the SLP SA.
Deprivation	+	+	See Table 28 of the SLP SA.
Education	+ / ++	+ / ++	The later delivery of housing does not impact on secondary school provision.
Employment	++	++	See Table 28 of the SLP SA.
Equality	++ / +++	++ / +++	See Table 28 of the SLP SA.
Health	++	++	See Table 28 of the SLP SA.
Heritage	--	--	See Table 28 of the SLP SA.
Housing	+++	++	SS3 revision A differs in that housing needs would only be met for the short term with this option. This is reflected in the slightly less positive score. A risk remains that insufficient sites are found when the 5-year review takes place.
Land use	--	-	Substantial loss of green field and Green Belt land (albeit with compensation elsewhere) with best and most versatile soils causes both options to be scored negatively with the scale of development reflected in the scores.
Landscape	--	--	See Table 28 of the SLP SA.
Noise	-	- / --	Noise scores reflect the scale of development across the options and the location of development adjacent to the railway line.
Resources	0 / +	0 / +	See Table 28 of the SLP SA.
Services & Facilities	+++	+++	No material change, as even though timing of service delivery would likely be deferred, it would still relate to housing growth. Also, as noted above in relation to secondary school provision.
Travel	++	++	See Table 28 of the SLP SA.
Waste	0	0	See Table 28 of the SLP SA.
Water	+ / ?	++ / ?	Mixed/positive scores are applied to reflect substantial demand for water and wastewater treatment whilst also providing significant benefits to Five Oak Green in flood risk reduction.

6.2 Paddock Wood Town Extension

6.2.1. A range of alternative options for the reduced scale of housing growth at Paddock Wood and east Capel have been considered as follows:

- An alternative that removes all residential development and employment sites from Flood Zones 2 and 3 (SS1 Revision A)
- An alternative that removes all residential development from Flood Zones 2 and 3 and all employment land from Flood Zone 3 (SS1 Revision B)
- An alternative that removes all residential development from Flood Zones 2 and 3, and retains employment land primarily in Flood Zone 2, but with some in Flood Zone 3 (SS1 Revision C)

6.2.2. For the purposes of this assessment, under Revision A, it is assumed that the employment land is located in the north-west sector of the town, close to the A228, replacing what would otherwise be land for housing. Under Revision B, employment sites are located adjacent to the existing Key Employment Area which is categorised as Flood Zone 2, but sites in Flood Zone 3 are removed. An option that also retains employment land that would now be in Flood Zone 3 may also be considered, notwithstanding the national policy approach to flood risk and because the Local Plan as a whole provides for a generous supply of employment land, most notably via the major allocation at Kingstanding Way close to the A21 to the south, in addition to there being a reasonable supply in lower flood zones. However, on balance, it is appraised below, as an option to boost employment in relative terms.

6.2.3. The three options above have been taken forward for further investigation under the assumption laid out in Table 23 below.

Table 23. Parameters for new reasonable alternatives for Paddock Wood and East Capel

Aspect	SS1 Revision A	SS1 Revision B	SS1 Revision C
Residential development distribution	Only in Flood Zone 1		
Residential development quanta	Approximately 2,250 (2,400-150) dwellings equivalent to c.68% of the Submission Local Plan strategic allocation.	Approximately 2,400 dwellings (excluding now consented land at Church Farm, and Barth Haas), equivalent to c.72% of the Submission Local Plan strategic allocation.	
Distribution of development	As per the DLA Addendum masterplan, with the exception of some 5 hectares of housing land in the NW quadrant close to the A228, which would be for employment uses instead (see below).	As per the DLA Addendum masterplan	As per the DLA Addendum masterplan, but with additional employment allocation of land east of Maidstone Road (to the north of that which has planning permission)
Secondary school	To be provided in the town (rather than at Tudeley Village). Options for secondary school provision include provision in the NW quadrant; expansion of the existing Mascalls secondary school; and provision on a development parcel south of the railway line.		
Primary schools	Provided in the E and NW quadrants.		
Local Centres	Provided in the E and NW quadrants.		
Employment sites distribution	Some 5 hectares in the NW quadrant close to the A228, in addition to that which already has permission such as Swatlands.	Provided adjacent to the existing Key Employment Area, but excludes all land in FZ3, although the land is still located within FZ2*. The revised area excludes the northern parcel of	Provided adjacent to the existing Key Employment Area, mainly on Flood Zone 2 land, but including land in FZ3 forming the northern parcel of 'Land east of Maidstone Road'.

Aspect	SS1 Revision A	SS1 Revision B	SS1 Revision C
	Only in Flood Zone 1.	'Land east of Maidstone Road', as well as the Garden Centre site to the west of Maidstone Road. It also involves a reconfiguration of employment areas on land east of Transfesa Road.	It also involves a reconfiguration of employment areas on land east of Transfesa Road. It excludes the Garden Centre site to the west of Maidstone Road.
Employment sites quanta	c.68% of the Submission Local Plan employment land allocation.	c.66% of the Submission Local Plan employment land allocation.	c. up to 94% of the Submission Local Plan employment land allocation.

* In this context, FZ2 is the zoning of the land at the end of the plan period taking account of a 37% climate change allowance, even though land may currently be shown as FZ1 on current Environment Agency maps.

6.2.4. Table 24 The above revised alternatives represent approximately the same quanta of development as that described in Options 3 and 5 in the Pre-Submission Local Plan SA [\[CD 3.62\]](#) of options for Paddock Wood including land in east Capel in terms of the scale of housing growth but with slightly modified distribution patterns (see page 98 of the Pre-Submission Local Plan SA report) which is more similar to Option 2. For these reasons, the appraisals for SS1 Revisions A, B and C are shown alongside the appraisals for Options 2, 3 and 5 in Table 24 below. It should be noted that Option 2 was the preferred Option in the Submission Local Plan.

Table 24. New SA assessments and scores for SS1 Rev A, B and C.

Sustainability Objective	Option 2 (3,500)	Option 3 (2,500)	Option 5 (2,500)	SS1 Rev A (2,250)	SS1 Rev B (2,400)	SS1 Rev C (2,400)	Commentary
Air	?	?	?	?	?	?	See Table 29 of the SLP SA.
Biodiversity	0/-	-	0/-	0/-	0/-	0/-	Scores applied as per Table 29 of the SLP SA.
Business Growth	+ /+++	+	+	+	+	+	Scores applied as per Table 29 of the SLP SA.
Climate Change	- /--	- /--	- /--	- /--	- /--	- /--	Scores applied as per Table 29 of the SLP SA.
Deprivation	+ /+++	+ /+++	+ /+++	+ /+++	+ /+++	+ /+++	Scores applied as per Table 29 of the SLP SA.
Education	+ /+++	+ /+++	+ /+++	++	++	++	The decision to locate a new secondary school in Paddock Wood instead of Tudeley Village improves this score as offers more choice.
Employment	++	++	++	+	+	+ /+++	Rev A and B both involved provision for less employment land. For Rev B, it is assumed that the strategic employment site at Kingstanding Way, Tunbridge Wells would contribute to meeting some of Paddock Wood's employment needs. Rev C is the most similar to the previous options in the Submissions LP SA.
Equality	++	+ /+++	+ /+++	++	++	++	Scores applied as per Table 29 of the SLP SA.
Health	++	++	++	++	++	++	Scores applied as per Table 29 of the SLP SA.
Heritage	-	- /--	-	-	-	-	Scores applied as per Table 29 of the SLP SA.
Housing	+++	+++	+++	++	++ /+++	++ /+++	Revisions A, B and C differ from other options in that housing needs would only be met in the short term. This is reflected in the slightly less positive score. A risk remains that insufficient sites are found

Sustainability Objective	Option 2 (3,500)	Option 3 (2,500)	Option 5 (2,500)	SS1 Rev A (2,250)	SS1 Rev B (2,400)	SS1 Rev C (2,400)	Commentary
							when the 5-year review takes place.
Land use	--/-- -	--	--	--	--	--	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Landscape	-/--	--	-/--	-	-	-/--	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Noise	-/--	-/--	-/--	-/--	-/--	-/--	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Resources	0/+	0/+	0/+	0/+	0/+	0/+	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Services & Facilities	++	+	+	++	++	++	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Travel	+	+	+	+	+	+	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Waste	0	0	0	0	0	0	Scores applied as per Table 29 of the SLP SA with Rev A likely to have improvements for local landscape character.
Water	++/?	?	?	++/ +++	++	+	Removing housing from Flood Zones 2 and 3 would make development easier to realise. Scores reflect variation in employment land sited in flood zones 2 and 3.

- 6.2.5. It can be seen that, when compared to preferred Option 2 in the Submission Local Plan SA, a slight worsening of scores are predicted for SS1 Revisions A, B and C for the objectives of Business, Employment and Housing, whereas there is a slight improvement in the score predicted for the Education, Land Use, Landscape, Services and Water objectives.
- 6.2.6. Across the Revisions, the greatest improvements overall are seen in Revisions A and B with the above-mentioned improvements for Landscape and Water being unique to these revisions. However, the reduced number of dwellings under Revision A means this option is somewhat inferior to Revisions B and C for the Housing objective. Revision C tends to score the worst of the three revisions with the score for the Water objective being notably less positive compared with Revisions A and B.
- 6.2.7. The cumulative impacts of incorporating these new revisions into the Local Plan have also been considered and it has been determined that the marginal nature of the altered scores, is unlikely to trigger a significant change to the cumulative scores recorded in Tables 50 and 52 of the SA report nor the SA assessment for STR 9 (Green Belt) requires reassessment, the scores for which are summarised in Appendix E of the SA report.

6.3 Overall Development Strategy

- 6.3.1. Following the individual assessments of the revised approaches to strategic sites in sections 0 and 0 above, the SA must now consider the impact of these revisions in combination as this may strengthen or weaken the overall development strategy.
- 6.3.2. As explained in Table 22 and Table 24, the reduction in scale of residential dwellings for the new revised strategic sites will mean a 15 year land supply is no longer possible as total dwellings numbers have declined by some 3,000 on the strategic sites, although the net reduction is less, being partially offset by other factors such as completions and increase windfall allowances.
- 6.3.3. This prospect highlights the need to consider a further option; that is, to provide enough housing land for a shorter period – which would be at least 10 years in line with paragraph 68 of the NPPF – with a commitment to an early review.
- 6.3.4. Whilst there are also options of reassessing previously less sustainable options in order to provide the full 15-years housing land supply, different distribution options have already been appraised. Therefore, rather than reappraise them, the further option at this stage is to suspend the examination to carry out this re-evaluation. Hence, this option presented is very similar to the previous “no plan” option.
- 6.3.5. In summary, there are 6 new development strategy options to consider as shown in Table 25 below.

Table 25. Parameters for new Development Strategy Options

Strategic Growth Option	Description	Option Number
Paddock Wood: As per PSLP Tudeley Village: SS3 Rev A Rest of borough: As per PSLP*	Retain Tudeley Village, but with updated 15 year trajectory and new distribution as per SS3 Rev A. The results of this exercise are shown to some extent in Table 22 and reveal a slight worsening of scores for the objectives of Housing and Noise. Table 26 below reconsiders this in the context of development across the whole borough.	14
Paddock Wood: As per PSLP Tudeley Village: none Rest of borough: As per PSLP*	This retains the PSLP allocations, including development in PWeC (including housing in FZ2/3). It is essentially the same as Option 4 in the PSLP SA but only meets 15 years housing need very marginally, so includes a need for early review. See Table 26 below.	15
Paddock Wood: SS1 rev A Tudeley Village: none Rest of borough: As per PSLP* with early review	Reduced strategic growth at PWeC with no housing or employment in FZ2/3, TV deleted, otherwise as per PSLP, with housing for 10 years and early review to maintain continuity of supply. See Table 26 below.	16
Paddock Wood: SS1 rev B Tudeley Village: none Rest of borough: As per PSLP* with early review	Reduced strategic growth at PWeC (no housing in FZ2/3, but some employment dev in FZ2), TV deleted, otherwise as per PSLP, with housing for 10 years and early review to maintain continuity of supply. See Table 26 below.	17
Paddock Wood: SS1 rev C Tudeley Village: none Rest of borough: As per PSLP* with early review	Reduced strategic growth at PWeC (no housing in FZ2/3, but some employment dev in FZ2 and FZ3), TV deleted, otherwise as per PSLP, with housing for 10 years and early review to maintain continuity of supply. See Table 26 below.	18

Strategic Growth Option	Description	Option Number
Paddock Wood: SS1 rev A/B/C Tudeley Village: none Rest of borough: As per PSLP* with balance TBC via review	As per previous three options, but with further work undertaken to reassess options to meet the balance of 15-years' housing need as part of this taking forward this Local Plan (rather than as part of a review). This is seen to essentially equate to Option 12 in Table 26 of the Submission Local Plan SA ("No Plan") so has already been assessed.	12
Paddock Wood: SS1 rev A/B/C Tudeley Village: SS3 rev A Rest of borough: As per PSLP* with early review	Reduced strategic growth at PWeC (no housing in FZ2/3), TV reduced, otherwise as per PSLP, with housing for 10 years and early review to maintain continuity of supply. See Table 26 below.	19A
Paddock Wood: SS1 rev A/B/C Tudeley Village: SS3 rev A Rest of borough: As per PSLP* with early review	Reduced strategic growth at PWeC (no housing in FZ2/3), TV reduced, otherwise as per PSLP, with housing for 15 years and early review to maintain continuity of supply. See Table 26 below.	19B

* plus 70 new dwellings in Hawkhurst

Table 26. New SA assessments and scores for further development strategy options (part 1 of 2)

Sustainability Objective	13 PSLP	14 PSLP & SS3 Rev A	15 PSLP & No TV	16 PSLP & SS1 Rev A & No TV	17 PSLP & SS1 Rev B & No TV	18 PSLP & SS1 Rev C & No TV
Air	0 / -	0 / -	0 / -	0 / -	0 / -	0 / -
Biodiversity	0	0	0	0	0	0
Business Growth	++	++	++	+ / ++	+ / ++	+ / ++
Climate Change	-	-	-	-	-	-
Deprivation	++	++	++	++	++	++
Education	++	++	++	++	++	++
Employment	+++	+++	+++	++	++ / +++	++ / +++
Equality	++	++	++	++	++	++
Health	++	++	++	++	++	++
Heritage	-	-	-	-	-	-
Housing	+++	++ / +++	+ / ++	+ / ++	+ / ++	+ / ++
Land use	- / - -	- / - -	-	0 / -	0 / -	0 / -
Landscape	-	-	-	-	-	-
Noise	-	-	-	-	-	-
Resources	?	?	?	?	?	?
Services & Facilities	0 / +	0 / +	0 / +	0 / +	0 / +	0 / +
Travel	0 / +	0 / +	0 / +	0 / +	0 / +	0 / +
Waste	0	0	0	0	0	0
Water	?	?	?	0 / +	0	0
Commentary	<p>This option was largely positive with some uncertainty over water scores.</p> <p>See Tables 25 and 26 from the Submission Local Plan SA for full details.</p>	<p>Slight reduction in score for the housing objective compared with Option 13.</p>	<p>Reduction in score for the housing and land use objectives compared with Option 13.</p>	<p>Reduction in score for the business, employment, land use and housing objectives when compared with Option 13.</p> <p>Improvement for Water objective.</p>	<p>When compared with Option 13, there is a reduction in scores for business, land use and housing objectives.</p> <p>Slight reduction for employment and improvement for the Water objective.</p>	<p>Similar to Option 17 with difference in housing numbers considered insignificant.</p>

Table 27. New SA assessments and scores for further development strategy options (part 2 of 2)

Sustainability Objective	12 No Plan	19A PSLP & SS3 Rev A & SS1 A/B/C (10 yr supply)	19B PSLP & SS3 Rev A & SS1 A/B/C (15 yr supply)
Air	--	0 / -	0 / -
Biodiversity	--	0	0
Business Growth	?	+ / ++	+ / ++
Climate Change	---	-	-
Deprivation	--	++	++
Education	---	++	++
Employment	?	++ / +++	++ / +++
Equality	?	++	++
Health	?	++	++
Heritage	--	-	-
Housing	+	++	++ / +++
Land use	--	-	-
Landscape	--	-	-
Noise	--	-	-
Resources	--	?	?
Services & Facilities	?	0 / +	0 / +
Travel	?	0 / +	0 / +
Waste	--	0	0
Water	?	0	0
Commentary	<p>This option scores poorly reflecting the uncertainty in delivery.</p> <p>See Tables 24 and 26 from the Submission Local Plan SA for full details.</p>	<p>Similar to Option 15 with improvement in land use score and reduction in housing score when compared to Option 13. Difference is seen in the improvement to the Water score.</p>	<p>Near identical to Option 19 with marginal improvement in housing score as there is more certainty that needs are met in the longer term and the risk that insufficient sites are found during the 5-year review is reduced.</p>

- 6.3.6. The differences between the development strategy options presented in Table 26 are marginal. In general, the reduction in housing numbers bring benefits to the Land Use objective as land take has lowered. Whereas, the altered distribution of housing across the three revisions of SS1 all bring about improvements to the water score. Finally, slight improvements in the housing score are brought about by the certainty of a 15 year supply.
- 6.3.7. Across the three options for Paddock Wood, Table 26 shows that there is merit to both SS1 Revision A and SS1 Revision B. However, it should be noted that the SA does not take into account deliverability which may be less of a barrier for Revision B.