

## **Interim Sustainability Appraisal**

### **Summary of Regulation 18 consultation responses (March 2026)**

#### **Question 115 – Please enter any comments you want to make about the Sustainability Appraisal.**

Total Number of responses received: 35
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#### **Question 116 – Please enter any comments you wish to make about sites that have been assessed in the Sustainability Appraisal.**

Total Number of responses received: 310
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#### Summary of issues raised

Of the 37 comments received on Question 115, the majority were from developers. Key themes included:

- Respondents supported the Interim Sustainability Appraisal (ISA) in principle, and there was broad support for the preferred growth strategy and its assessment (Option 2 plus large extensions from Option 4).
- Developers expressed concern that the ISA has not tested different quanta of development including a higher-growth option to account for the need to include a buffer.
- Respondents had a range of site-specific technical queries relating to how sites have been scored in the ISA, with some submitting alternative assessments and additional information.

Of the 318 comments received on Question 116, the majority (294) were from individuals, with a small number (13) from developers and the remainder from other organisations. Key themes included:

- The majority of respondents disagreed with the findings of the ISA.
- A large number of standard representations raised site specific concerns relating to the scoring of sites TO1, TO5, BN1 and KH1.
- Developers raised a series of site-specific technical queries relating to how sites have been scored in the ISA, with some submitting alternative assessments and additional information.
- Some developers raised concerns that additional site-specific information that had been submitted by them, had not been taken into account in the ISA assessments.
- A number of respondents raised concerns that cumulative impacts had not been had regard to.

- Some respondents were concerned that the ISA lacks transparency and is subjective in its assessments.

#### Summary of feedback from Statutory Consultees, District / Boroughs and other consultation bodies – Q115 and Q116

No comments were received.

#### Summary of feedback from Parish Councils – Q115

- **Kings Hill Parish Council** – TMBC has not provided a cumulative impact assessment, contrary to NPPF para 31.

#### Summary of feedback from Parish Councils – Q116

- No comments were received from Parish Councils.

#### Officer response to the consultation feedback

The Regulation 18 consultation invited comments on the ISA. A significant number of representations were received from residents, as well as developers, parish councils and other organisations. The comments have provided valuable feedback. However, officers consider that the ISA remains appropriate, proportionate and in accordance with national policy.

All reasonable alternative site options are appraised consistently in the ISA using the site assessment criteria set out in Appendix D. Additional site-specific information submitted by respondents cannot be taken into consideration in the ISA, as all sites must be appraised consistently using the same information.

A range of spatial options and quanta have been already tested in the ISA, based on the evidence that was available at the time the ISA was produced. Paragraph 5.27 of the Regulation 18 Local Plan identifies that the council will be undertaking further work to determine whether a buffer to the housing requirement can be incorporated.

Cumulative effects are considered in the ‘Cumulative Effects’ section of the ISA.

All comments relating to the ISA have been provided to our consultants for consideration. A number of refinements to the SA will take place prior to Regulation 19 to ensure that all reasonable alternatives have been assessed, including new sites submitted for consideration, and that regard is had to emerging and updated evidence. The SA is an iterative process that is undertaken alongside the production of the Local Plan and further work will be progressed accordingly.