Tunbridge Wells Local Plan

Regulation 19 Habitats Regulations Assessment

Tunbridge Wells Borough Council

60553932

Quality information

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1. Background

Introduction

AECOM was appointed by Tunbridge Wells Borough Council (hereafter referred to as 'TWBC') to assist the Council in undertaking a Habitats Regulations Assessment of its Regulation 19 Draft Local Plan. The objective of this assessment was to identify any aspects of the Plan that would cause an adverse effect on the integrity of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites), either in isolation or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects were identified.

The Draft Local Plan seeks to meet housing and employment needs within the Borough without compromising the built and natural environment. It will identify requirements for development and growth within the District, including when and where development and growth will occur throughout the Local Plan period (2020 – 2038). 2038

An initial HRA of the emerging TWBC Local Plan was carried out by AECOM in 2016, followed by a Regulation 18 HRA in 2019. The HRA draws upon traffic and air quality modelling undertaken for key traffic nodes in Ashdown Forest SAC and repeated on-site visitor surveys of the SAC, allowing for a much more detailed consideration of these impact pathways. In addition, a more detailed Plan specifying the quantum and location of housing and employment development has also been provided. Considering these new data, this report provides a detailed analysis of the Likely Significant Effects (LSEs) on European sites related to the Local Plan and an Appropriate Assessment considering the potential for the Plan to adversely affect the integrity of European sites where relevant. The Regulation 18 Local Plan HRA indicated that the Ashdown Forest SAC and SPA is the sole European site requiring consideration. 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.

The objective of this Regulation 19 report is to identify any aspects of the Plan that would be likely to lead to adverse effects on the integrity of any sites afforded protection under the Habitats Regulations. In the UK, this comprises Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), and potential Special Protection Areas (pSPAs). In accordance with Government policy, assessment is applied to sites designated under the Ramsar Convention on Wetlands of International Importance (Ramsar sites). These sites are referred to collectively in this Report as "European Sites".

Legislative Context

Under Article 6(3) of the Habitats Directive(92/43/EEC), an appropriate assessment is required, where a plan or project is likely to have a significant effect upon a European Site, either individually or 'in combination' with other projects. This requirement is set out in the Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations"), as amended. 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, which is currently set to end on 31 December 2020. The Withdrawal Act retains the body of existing EU-derived law within our domestic 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 HRA will continue after the end of the Transition Period.

The Regulations apply the precautionary principle[1] to European Sites. Consent should only be granted for plans and projects once the relevant competent authority has ascertained that there will either be no likelihood of significant effects, or no adverse effect on the integrity of the European

[1] The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as:
"*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*".

Site(s) in question. Where an Appropriate Assessment has been carried out and results in a negative impact, or if uncertainty remains over the significant effect, consent will only be granted if there are no alternative solutions and there are Imperative Reasons of Over-riding Public Interest (IROPI) for the development and compensatory measures have been secured.

To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question. The competent authority is entitled to request the applicant to produce such information as the competent authority may reasonably require for the purposes of the assessment, or to enable it to determine whether an appropriate assessment is required. Figure 1 provides the legislative basis for an Appropriate Assessment.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"*A competent authority, before deciding to … give any consent for a plan or project which is likely to have a significant effect on a European site … must make an appropriate assessment of the implications for the plan or project in view of that site's conservation objectives… The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site."*

Figure 1. The legislative basis for Appropriate Assessment

Over the years, 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Regulations, from screening through to identification of IROPI. This has arisen in order to distinguish the overall process from the individual stage of "Appropriate Assessment". Throughout this Report the term HRA is used for the overall process and restricts the use of Appropriate Assessment to the specific stage of that name.

Scope of the Project

There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model) rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Tunbridge Wells Borough boundary; and,
- Other sites shown to be linked to development within the District boundary through a known 'pathway' (discussed below).

Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a European designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect European sites by, for example, disturbance of wintering or breeding birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be '*proportionate to the geographical scope of the* [plan policy]' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (MHCLG, 2006, p.6). More recently, the Court of Appeal[2] ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)3. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*'.

[2] No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015
[3] High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

Given the findings of the Regulation 18 Local Plan HRA, this Regulation 19 report will focus entirely on the following European sites:

- Ashdown Forest SAC; and,
- Ashdown Forest SPA.

The reasons for designation of these sites, together with current trends in habitat quality and pressures on the sites, are set out in chapter 3.

In order to fully inform the screening process, a number of recent studies have been consulted to determine likely significant effects that could arise from the Local Plan. These include:

- Future development proposed (and, where available, HRAs) for Lewes, Mid-Sussex, Horsham, Wealden, Rother, and Brighton & Hove Districts.
- Ashdown Forest Air Quality Impact Assessment undertaken in November/December 2020;
- Ashdown Forest Visitor Survey 2016[4];
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk)

Quality Assurance

This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.

All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2017).

[4] Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.

2. Methodology

Introduction

The HRA has been carried out with reference to the general EC guidance on HRA[5] and that produced in July 2019 by the UK government[6]; Natural England has produced its own internal guidance[7]. These have been referred to in undertaking this HRA.

Plate 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

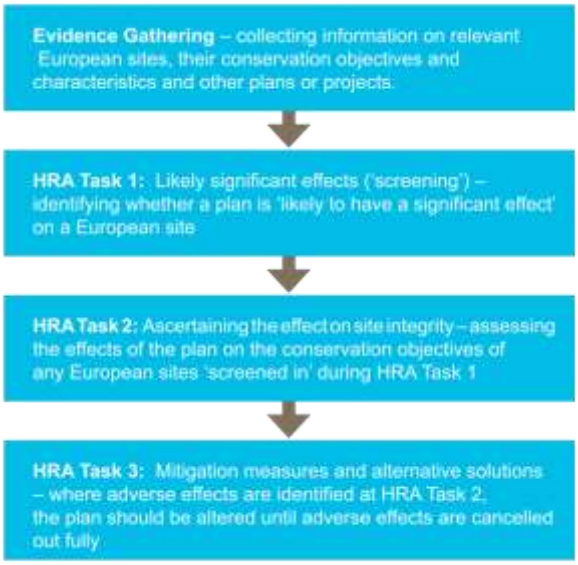

Figure 2. Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001[1].

Description of HRA Tasks

HRA Task 1 – Likely Significant Effects (LSE)

Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is undertaken in Chapter 4 of this report and in Appendix A.

HRA Task 2 – Appropriate Assessment (AA)

Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.

[5] European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.
[6] https://www.gov.uk/guidance/appropriate-assessment
[7] http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the European site(s)).

A decision by the European Court of Justice[8] in 2018 concluded that measures intended to avoid or reduce the harmful effects of a proposed project on a European site may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. That ruling has been taken into account in producing this HRA.

Also in 2018, the Holohan ruling[9] was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that '*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, … typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*' [emphasis added]. This has been taken into account in the HRA process particularly with regard to air quality effects on the deciduous woodland habitat of Ashdown Forest SAC/SPA. Since permanent deciduous woodland of the site is not '*necessary to the conservation of the habitat types and species listed for the protected area'* (i.e. the heathland, great crested newt and populations of nightjar and Dartford warbler) it does not need considering in the HRA.

HRA Task 3 – Avoidance and Mitigation

Where necessary, measures are recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on European sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.

In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the European sites considered within this assessment.

When discussing 'mitigation' for a Local Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Plan document is a high-level policy document.

Physical Scope of the HRA

There are no standard criteria for determining the ultimate physical scope of an HRA. Rather, the source-pathway-receptor model should be used to determine whether there is any potential pathway connecting development to any European sites. In the case of Tunbridge Wells Borough (hereafter referred to as 'TWB') it was determined at an early stage that for an initial coarse screen, a single site comprising multiple European Designations should be looked at:

- Ashdown Forest SAC
- Ashdown Forest SPA

This was based upon a 20km zone of search around Borough boundaries and included housing and employment development sites. These were therefore the subject of the initial screening exercise. It should be noted that the presence of a conceivable pathway linking the Borough to a European site does not mean that likely significant effects will occur.

[8] People Over Wind and Sweetman v Coillte Teoranta (C-323/17)
[9] Case C-461/17

3. European Designated Sites

Ashdown Forest Special Area of Conservation

Introduction

Ashdown Forest is an extensive area of common land lying between East Grinstead and Crowborough entirely within Wealden District. The soils are derived from the predominantly sandy Hastings Beds, supporting valley mires, heath and damp woodland.

Despite a recent acceleration in the development of woodland, Ashdown Forest remains one of the largest single continuous blocks of lowland heath in England. Its geology in combination with climatic factors provide soils that are typically acid, clayey and nutrient-poor, supporting a range of heathland flora, including heather (*Calluna vulgaris*), bell heather (*Erica cinerea*), cross-leaved heath (*Erica tetralix*), gorse (*Ulex europaeus*) and dwarf gorse (*Ulex minor*). In turn, these plants support a rich invertebrate flora and unique assemblages of heath and woodland birds (see introduction on Ashdown Forest SPA).

The heath woodland may be varied, including birch (*Betula sp.*, acting as primary colonisers), oak (*Quercus robur*), willow (*Salix sp.*) and pine (*Pinus* sp.). In areas where grazing management has been limited, woodland often encroaches over former heath, forming dense and shaded areas with sparse ground flora.

Features of European interest[10]

The site was designated as being of European importance for the following interest feature:

Annex I habitats:

- Northern Atlantic wet heathland with *Erica tetralix* (Annex I)
- European dry heathland, dominated by *Calluna vulgaris* (Annex I)

Annex II species:

- Great crested newt (*Triturus cristatus*) (qualifying feature, but not primary reason for designation)

Conservation Objectives[11]

With regard to the SAC and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of the qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying habitats and the habitats of the qualifying species rely

[10] Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive; available at http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0030080 [Accessed: 12/04/2019].

[11] Natural England (2014). European Site Conservation Objectives for Ashdown Forest SAC Site Code: UK0030080 http://publications.naturalengland.org.uk/file/6746917321048064 [accessed 12/04/2019]

- The populations of qualifying species, and,
- The distribution of the qualifying species within the site.

Threats & Pressures to Ashdown Forest SAC

The key environmental vulnerabilities are summarised in the section on the Ashdown SPA below, because these are the same for both European sites.

Ashdown Forest Special Protection Area

Introduction

The mosaic of habitats, and specifically the heath and woodland, in Ashdown Forest harbours a high species richness of birds. These include woodland specialists (e.g. woodcock, tree pipits, siskins, lesser redpoll) as well as various birds of prey (e.g. buzzards, sparrowhawk, hobby). However, most notably, Ashdown Forest harbours specialist species that critically depend on the heath for survival, including nightjar and Dartford warbler.

The Dartford warbler depends on mature, dry heath habitats (especially gorse) in good condition for surviving the winter. It is a ground-nesting bird that builds a grassy, cup-shaped nest under the protective cover of dense heather or gorse. Similarly, nightjar usually build their nests in small gaps in dry heather, which provide shelter and protection from potential predators. Both species depend on the rich invertebrate fauna that is supported by the heath.

Features of European interest[12]

This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species listed on Annex I of the Directive:

Annex I breeding species:

- European nightjar (*Caprimulgus europaeus*) – 35 pairs (1% of the breeding population)
- Dartford warbler (*Sylvia undata*) – 29 pairs (1.8% of the breeding population)

Conservation Objectives[13]

With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change;

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

[12] Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive; available: http://jncc.defra.gov.uk/default.aspx?page=2052 [Accessed 12/04/2019].

[13] Natural England (2014) European Site Conservation Objectives for Ashdown Forest SPA Site Code: UK9012181 http://publications.naturalengland.org.uk/publication/6399918323269632 [accessed 12/04/2019]

Threats & Pressures to Ashdown Forest SPA / SAC[14]

The key environmental pressures for the site affecting the wet heathland are:

- Change in land management
- Air pollution: impact of atmospheric nitrogen deposition

The key environmental threat for the site affecting European nightjar and Dartford warbler are:

- Public Access/Disturbance
- Hydrological changes

[14] Natural England (2014) Ashdown Forest Site Improvement Plan http://publications.naturalengland.org.uk/file/5534055007256576 http://publications.naturalengland.org.uk/file/6679502935556096 [accessed 12/04/2019]

4. Test of Likely Significant Effects

Introduction

The full Likely Significant Effects assessment of strategic policies within the Regulation 19 Local Plan can be found in Appendix 1. The full Likely Significant Effects assessment of site allocations identified within the draft Local Plan can be found in Appendix 2.

The following paragraphs summarise the relevant impact pathways considered and the outcome of the Likely Significant Effects assessment, which identifies policies and site allocations that (prior to considering the role of mitigation) have potential to result in LSEs upon the Ashdown Forest SPA / SAC.

Impact Pathways Considered

The following impact pathways are considered relevant to the TWBC draft Local Plan:

- Increase in atmospheric pollution from an increase in traffic flow
- Increased recreational pressure.

Background to Atmospheric Pollution

Table 1: Main sources and effects of air pollutants on habitats and species[15]

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO_2)	The main sources of SO_2 are electricity generation, and industrial and domestic fuel combustion. However, total SO_2 emissions in the UK have decreased substantially since the 1980's. Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO_2 have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO_2 emissions in the UK.	Wet and dry deposition of SO_2 acidifies soils and freshwater, and may alter the composition of plant and animal communities. The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species. However, SO_2 background levels have fallen considerably since the 1970's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO_2, NOx, ammonia and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, increased N emissions may cancel out any gains produced by reduced S levels.	Gaseous precursors (e.g. SO_2) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.

[15] Information summarised from the Air Pollution Information System (http://www.apis.ac.uk/)

Pollutant	Source	Effects on habitats and species
Ammonia (NH_3)	Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock. Ammonia reacts with acid pollutants such as the products of SO_2 and NO_X emissions to produce fine ammonium (NH_4+) - containing aerosol. Due to its significantly longer lifetime, NH_4+ may be transferred much longer distances (and can therefore be a significant trans-boundary issue). While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.	The negative effect of NH_4+ may occur via direct toxicity, when uptake exceeds detoxification capacity and via N accumulation. Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in the rural environment and NH_3 is rapidly deposited, some of the most acute problems of NH_3 deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO_x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO_X emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. In contrast to the steep decline in Sulphur dioxide emissions, nitrogen oxides are falling slowly due to control strategies being offset by increasing numbers of vehicles.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NOx for all vegetation types has been set to 30 ug/m3. Deposition of nitrogen compounds (nitrates (NO_3), nitrogen dioxide (NO_2) and nitric acid (HNO_3)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.
Nitrogen deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_X) or reduced (e.g. NH_3) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The N pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication. This is because many semi-natural plants cannot assimilate the surplus N as well as many graminoid (grass) species. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O_3)	A secondary pollutant generated by photochemical reactions involving NOx, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to	Concentrations of O_3 above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O_3 concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.

Pollutant	Source	Effects on habitats and species
	reduce levels of the precursors that form ozone.	

The main pollutants of concern for European sites are oxides of nitrogen (NOx), ammonia (NH_3) and sulphur dioxide (SO_2) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges[16]. NOx can also be toxic at very high concentrations (far above the annual average critical level). High levels of NOx and NH_3 are likely to increase the total N deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and to lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats[17] [18].

Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping[19]. Ammonia emissions originate from agricultural practices[20], with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO_2 or NH_3 emissions will be associated with the available Local Plan Documents. NOx emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion to its overall NOx footprint (92%) through the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison[21]. Emissions of NOx could therefore be reasonably expected to increase because of a higher number of vehicles due to implementation of the Local Plan Documents.

According to the World Health Organisation, the critical NOx concentration (critical threshold) for the protection of vegetation is 30 μgm^{-3}; the threshold for sulphur dioxide is 20 μgm^{-3}. In addition, ecological studies have determined 'critical loads'[22] of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).

According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant[23]. This is therefore the distance that has been used throughout this HRA in order to determine whether European sites are likely to be significantly affected by development outlined in the Local Plan.

[16] http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.
[17] Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. **2006.** Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. Lichenologist 38: 161-176
[18] Dijk, N. **2011.** Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation Global Change Biology 17: 3589-3607
[19] http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.
[20] Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. 1998. A new inventory for ammonia emissions from U.K. agriculture. Atmospheric Environment 32: 309-313
[21] Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. http://www.airquality.co.uk/archive/index.php
[22] The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur
[23] http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013; accessed 12/05/2016

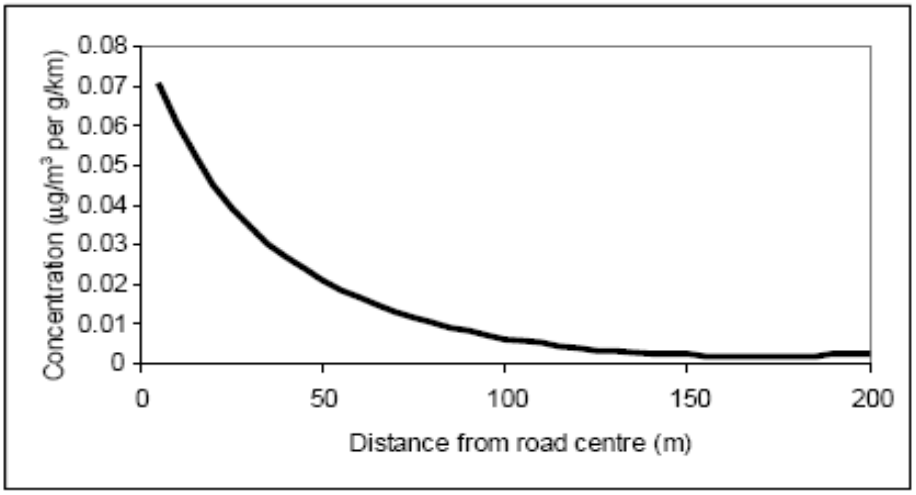

Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT[24])

Exhaust emissions from vehicles are capable of adversely affecting heathland habitats. Considering this, an increase in net population and employment growth within the Tunbridge Wells District could result in increased traffic through Ashdown Forest SAC, which is designated both for its wet and dry heathland habitats. Appendix 3 discusses the background to this issue in more detail.

Background to Recreational Pressure

There is growing concern about the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. This applies to any habitat, but the key qualifying features in lowland heathland are particularly vulnerable to human disturbance. An English Nature Research Report summarizes the key urban effects on heathland as habitat fragmentation, human disturbance, disturbance by animals linked to human presence (i.e. dogs and cats), increased risk of fires and trampling damage[25]. Various research reports have provided compelling links between changes in housing and access levels and impacts on European protected sites[26] [27].

Particular concerns apply to recreation effects on ground-nesting birds, with many studies concluding that more urban sites support lower densities of key species, such as stone curlew and nightjar[28] [29] This is a direct consequence from the fact that birds are expending energy avoiding the stressor and this is time that is not spent feeding[30]. Overall, disturbance is likely to increase energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds.

Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance than hiking[31]. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers[32]. A UK meta-analysis suggests that important spatial (e.g. the area of a site potentially influenced) and temporal (e.g. how often or long an activity is carried out) parameters differ between

[24] http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf; accessed 13/07/2018
[25] Underhill-Day, J. 2005. A literature review of urban effects on lowland heaths and their wildlife. English Nature Research Reports 623. 56pp.
[26] Liley D, Clarke R.T., Mallord J.W., Bullock J.M. 2006a. The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.
[27] Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. 2006b. Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.
[28] Clarke R.T., Liley D., Sharp J.M., Green R.E. 2013. Building development and roads: Implications for the distribution of stone curlews across the Brecks. PLOS ONE. doi:10.1371/journal.pone.0072984.
[29] Liley D., Clarke R.T. 2003. The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. Biological Conservation 114: 219-230.
[30] Riddington, R. *et al*. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279
[31] Banks P.B., Bryant J.Y. 2007. Four-legged friend or foe? Dog walking displaces native birds from natural areas. Biology Letters 3: 14pp.
[32] Miller S.G., Knight R.L., Miller C.K. 2001. Wildlife responses to pedestrians and dogs. 29: 124-132.

recreational activities, suggesting that these are factors that should ideally be considered in ecological assessments[33].

In addition, displacement of birds from one feeding site to others can increase the feeding pressure on available resources, which have to sustain greater numbers of birds[34]. Recreation disturbance in winter can be more adverse because birds are more vulnerable at this time of year due to food shortages. Disturbance can also represent a much more direct threat to survival, such as in the case of predation by dogs and cats. Dogs are often exercised off-lead and roam out of sight of their owners and have been documented to kill ground-nesting birds.

The available baseline information suggests that Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reduced breeding success of nightjar and Dartford warbler, which are ground-nesting birds and qualifying features of the SPA. At its closest point, Ashdown Forest is approximately 4.6km from the boundary of Tunbridge Wells Borough, 7.6 km away from Speldhurst (the closest parish with residential site allocations) and 20km from Paddock Wood (the parish with the largest allocated residential site). An increase in recreational pressure due to the implementation of the Tunbridge Wells Borough Local Plan is therefore a potential concern for the populations of bird species which the SPA is designated for.

Screening of site allocations and strategic policies

The screening for this HRA report was undertaken considering the core recreational catchment of 7km that has been agreed upon for Ashdown Forest SPA / SAC by surrounding authorities and Natural England, based on a visitor survey conducted by Footprint Ecology in 2010 (the results of visitor surveys are discussed further in the Appropriate Assessment section on recreational pressure). In summary, the 2010 survey concluded that visitors to Ashdown Forest originating from beyond 7km distance to the European site, made a negligible contribution to the overall on-site recreational footprint, and thus the core catchment boundary was set at 7km. That was verified during an update survey in 2016.

Site allocations

The following strategic parish and site allocation policies within the TWB Local Plan detail the provision of new homes and / or employment space, and therefore may be relevant to the recreational pressure and air pollution impact pathways (Appendix 2 for screening results of strategic and site allocation policies):

Individual site allocation policies

Royal Tunbridge Wells

- AL/RTW 1
- AL/RTW 2
- AL/RTW 3
- AL/RTW 4
- AL/RTW 5
- AL/RTW 6
- AL/RTW 7
- AL/RTW 8
- AL/RTW 9
- AL/RTW 10
- AL/RTW 11
- AL/RTW 12
- AL/RTW 13
- AL/RTW 14
- AL/RTW 15

[33] Weitowitz D., Panter C., Hoskin R., Liley D. The spatio-temporal footprint of key recreation activities in European protected sites. Manuscript in preparation.
[34] Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- AL/RTW 16
- AL/RTW 17
- AL/RTW 18
- AL/RTW 19
- AL/RTW 20
- AL/RTW 21
- AL/RTW 22

Southborough Parish
- AL/SO 1
- AL/SO 2
- AL/SO 3

Paddock Wood Parish
- AL/PW 1

Cranbrook and Sissinghurst Parishes
- AL/CRS 1
- AL/CRS 2
- AL/CRS 3
- AL/CRS 4
- AL/CRS 5
- AL/CRS 6
- AL/CRS 7

Hawkhurst Parish
- AL/HA 1
- AL/HA 2
- AL/HA 3
- AL/HA 4
- AL/HA 5
- AL/HA 6
- AL/HA 7

Benenden Parish
- AL/BE 1
- AL/BE 2
- AL/BE 3
- AL/BE 4

Brenchley and Matfield Area Parish
- AL/BM 1
- AL/BM 2

Frittenden Parish
- AL/FR 1

Goudhurst Parish
- AL/GO 1
- AL/GO 2

Horsmonden Parish
- AL/HO 1
- AL/HO 2
- AL/HO 3

Lamberhurst Parish
- AL/LA 1

Pembury Parish

- AL/PE 1
- AL/PE 2
- AL/PE 3
- AL/PE 4
- AL/PE 5
- AL/PE 6
- AL/PE 7
- AL/PE 8

Rusthall Parish
- AL/RU 1

Sandhurst Parish
- AL/SA 1
- AL/SA 2

Speldhurst Parish
- AL/SP 1
- AL/SP 2

Strategic development policies for towns and parishes

- STR/RTW 1 (the Strategy for Royal Tunbridge Wells)
- Policy STR/RTW 2 (Royal Tunbridge Wells Town Centre)
- STR/SO 1 (the Strategy for Southborough)
- STR/CA 1 (the Strategy for Capel Parish)
- STR/PW 1 (the Strategy for Paddock Wood)
- STR/CRS 1 (the Strategy for Cranbrook and Sissinghurst)
- STR/HA 1 (the Strategy for Hawkhurst Parish)
- STR/BE 1 (the Strategy for Benenden Parish)
- STR/BM 1 (the Strategy for Brenchley and Matfield Parish)
- STR/FR 1 (the Strategy for Frittenden Parish)
- STR/GO 1 (the Strategy for Goudhurst Parish)
- STR/HO 1 (the Strategy for Horsmonden Parish)
- STR/LA 1 (the Strategy for Lamberhurst Parish)
- STR/PE 1 (the Strategy for Pembury Parish)
- STR/RU 1 (the Strategy for Rusthall Parish)
- STR/SA 1 (the Strategy for Sandhurst Parish)
- STR/SP 1 (the Strategy for Speldhurst Parish)

However, when considering any proposed development within individual parishes or allocated sites in TWB, this is all located more than 7km (in many cases more than 20km) away from Ashdown Forest SPA / SAC. As mentioned before, this is relevant because 7km has been agreed as the core recreational catchment for the European site. Due to there being no LSEs of individual parish or site allocation policies on Ashdown Forest, all of the specific allocations have been screened out from appropriate assessment as being unlikely to result in significant effects on Ashdown Forest SPA / SAC due to being located outside the core recreational catchment of the site.

Strategic policies

The following policies have been screened in for appropriate assessment (Appendix 1 for screening of strategic policies). These policies present potential impact pathways through which a likely significant effect on the Ashdown Forest SAC and / or SPA could result, prior to any consideration of mitigation strategies:

- Policy STR 1: The Spatial Development Strategy
- Policy ED 1: The Key Employment Areas

The main reason for screening in these policies is that they address the cumulative housing or employment development in the TWB and may result in LSEs on Ashdown Forest SPA / SAC through

increased motor traffic and / or recreational pressure, in the latter case due to windfall housing that may arise within the 7km zone. We therefore have considered residential and employment growth holistically across the district by screening in the overarching strategic policies.

Local plans to be considered 'in-combination'

It is obligatory to not only assess LSEs of a proposed plan alone, but also to investigate whether there might be 'in-combination' effects with plans proposing development in other authorities surrounding a European protected site. In practice, such an 'in-combination' assessment is of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

For the purposes of this HRA, we have identified several districts that have developed their own Local Plans, outlining residential and / or employment growth within their own boundary. These include Tandridge, Sevenoaks, Mid-Sussex, Wealden and Lewes. Table 2 summarises the residential growth allocated within the respective Local Plans for these districts. However, for the purposes of air quality modelling, a prediction of changes in traffic flows on relevant links through Ashdown Forest was made using the Department for Transport's National Trip End Model Presentation Program (TEMPRO), which is an industry standard database tool. TEMPRO draws upon data for each local authority district in the UK regarding changes in population, households, workforce and employment (in addition to data such as car ownership), to produce a growth factor that is applied to the measured flows to 'grow' them to the end of the plan period. As such, growth in other authorities not listed below, such as Rother and Hastings, is also included in the 'in combination' assessment of air quality.

Table 2: Number of houses that are to be delivered in other authorities surrounding Ashdown Forest SPA / SAC, according to adopted Core Strategies and Local Plans

Local Authority	Total housing provided
Mid-Sussex	16,390 (2014-2031)[35]
Wealden	14,228 (2013-2028)[36]
Sevenoaks	12,500 (2015-2035)[37]
Tandridge	6,056 (2014-2033)[38]
Lewes	6,900 (2010-2030)[39]

[35] https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf [Accessed 15/04/2019]

[36] http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Wealden_Local_Plan/Wealden_Local_Plan_Submission_Library.aspx [Accessed 15/04/2019]

[37] https://www.sevenoaks.gov.uk/info/20069129/current_local_plan [Accessed 15/04/2019]

[38] https://www.tandridge.gov.uk/Portals/0/Documents/Planning%20and%20building/Planning%20strategies%20and%20policies/Local%20plan/Local%20plan%202033/Our-Local-Plan-2033-WEB.pdf [Accessed 15/04/2019]

[39] https://www.lewes-eastbourne.gov.uk/_resources/assets/inline/full/0/257159.pdf [Accessed 15/04/2019]

5. Appropriate Assessment: Ashdown Forest SAC & SPA

Air Quality at Ashdown Forest Special Area of Conservation and Special Protection Area

The HRA has identified the following policies in the Local Plan providing for cumulative new development within the District, and which need to be considered further:

- Policy STR 1 The Spatial Development Strategy;
- Policy ED 1: The Key Employment Areas

The qualifying features of Ashdown Forest SAC comprise different heathland habitat types (i.e. both dry and wet heaths), all of which are sensitive to air pollution (particularly nitrogen increases) due to their adaptation to nutrient-poor conditions. Increased nutrient inputs have been observed to result in changes of the community structure, such as an increased dominance of grasses[40] and reduced abundance in bryophyte and lichens[41]. Moreover, the qualifying species of Ashdown Forest SPA, the nightjar and Dartford warbler, both rely on heathland habitat for foraging and breeding, and might therefore be indirectly affected by habitat changes that are the result of air pollution.

Commuter traffic

Generally, the impact of air pollutants from traffic is only relevant within 200m of roads. Most of the site allocations are located far from Ashdown Forest SAC and as such there are no Likely Significant Effects on air quality to be expected from individual allocations. However, given the considerable level of planned residential development within the TWB Local Plan (expecting an additional 12,200 net new dwellings between 2020 and 2038 in addition to existing allocations and commitments) and the number of dwellings to be delivered by surrounding districts over a similar timescale, the TWB Local Plan might have significant air quality impacts alone and 'in-combination' with other Local Plans. This is because these allocations will increase the local population and / or the need for motorised travel within the District.

According to Journey to Work data from the 2011 census[42] four of the ten most common destinations for journeys to work arising from TWB are London boroughs, while the others are Tonbridge & Malling, Sevenoaks, Maidstone, Wealden, Ashford and Rother. These ten local authority areas are involved in almost 73.2% of journeys to work from TWB into surrounding districts. Of these destinations, only 1,586 outward journeys (just over 7%) of journeys to work are to Wealden (the only authority on this list likely to involve a journey through Ashdown Forest, although it can be reached via alternative routes depending on destination). However, these data do not include journeys to work that both start and end in Tunbridge Wells and the approximately 40% of commuter trips that are carried out by bike or public transport. Therefore, the actual proportion of regular commuter journeys that might traverse Ashdown Forest SAC is likely to be considerably lower than 7%.

It is clearly unlikely that much journey-to-work traffic originating from TWB will occur on roads that are relevant to Ashdown Forest SAC / SPA. Most transport routes from TWB are likely to lead passengers north up the A26 through the districts of Tonbridge and Malling, and Sevenoaks to then access the main commuting corridors along the M25 and M26. However, a portion of the traffic from Tunbridge Wells is likely to flow along the A26 in the direction of Crowborough, and beyond. We note that the A26 runs directly adjacent to Ashdown Forest SAC beyond Crowborough approx. 12.5km in actual road distance (not a straight-line distance) from TWB district boundary. As such, some of the residential and industrial traffic originating from Tunbridge Wells and destined for settlements in the south (e.g. Uckfield, Eastbourne or Brighton and Hove) may be relevant to Ashdown Forest SAC.

While some 112,000 m^2 of employment space in TWB have already been allocated, it is noted that some of the forecast employment space is not allocated in the current version of the draft Plan. This

[40] Bobbink R., Roelofs J.G.M. 1995. Nitrogen critical loads for natural and semi-natural ecosystems: The empirical approach. Water, Air and Soil Pollution 85: 2413-2418.
[41] Pescott O.L., Simkin J.M., August T.A. Randle Z., Dore A.J., Botham M.S. 2015. Air pollution and its effects on lichens, bryophytes, and lichen-feeding Lepidoptera: Review and evidence from biological records. Biological Journal of the Linnean Society 115: 611-635.
[42] Available at https://www.nomisweb.co.uk/census/2011/wu03uk [accessed 12/04/2019]

includes employment space in some of the larger parishes, such as Paddock Wood and Capel. Looking at the likely inflow routes of commuter traffic from settlements in the Wealden District (e.g. Uckfield, Eastbourne and Seaford), it is likely that most journeys will take commuters up the A267 to their destinations in TWB[43]. This road is located east of Ashdown Forest, far beyond the 200m distance that is relevant to the air pollution impact pathway. Considering the general results of the air quality study and the likely routes to work taken by people commuting to TWB, the employment allocations detailed in the TWB Plan are not likely to result in adverse impacts on Ashdown Forest SPA / SAC.

Results of Air Quality Modelling 'in combination'

Air quality modelling was undertaken for the Regulation 19 Tunbridge Wells Local Plan (see Appendix 3 for the full air quality analysis report). The Tunbridge Wells Borough Air Quality Impact Assessment report aimed to analyse air quality impacts that are the result of development proposed in the TWB Local Plan, while considering the 'in-combination' effect of traffic changes due to other Local Plans (e.g. Lewes District, Sevenoaks District, and South Downs National Park). Ultimately, this exercise intended to determine whether a potential increase in traffic from TWB might affect the heathland components in Ashdown Forest SAC alone or 'in-combination' with other plans.

In summary, this report analysed three key pollutants shown to affect ecosystems, namely ammonia (NH_3), oxides of nitrogen (NO_X) and total nitrogen deposition.

In summary:

1. Air quality within 200m of the roadside in 2038 is forecast to be significantly better than in 2017 notwithstanding the precautionary assumptions made about both growth and improvements in vehicle emissions factors;
2. NOx concentrations at heathland within 200m of the A26 and A275 are expected to be below the critical level by 2038;
3. Nitrogen deposition rates and ammonia concentrations will continue to exceed the critical load or level due to existing sources but the potential for vegetation recovery in more than 99% of heathland in the SAC will be unaffected by local traffic growth;
4. The remainder is a narrow roadside belt that may experience a subtle difference with all planned housing and employment growth, consisting primarily of a slight difference in percentage grass cover and species richness, but even here the reduction in nitrogen deposition, and potential for vegetation recovery, will still be approximately 80% of that which would be expected without housing and employment growth;
5. the contribution of Tunbridge Wells Local Plan to the 'in combination' deposition for those nearest areas of heathland is nugatory, being a little above zero. This is relevant since in European Court of Justice Case C-258/11 Advocate-General Sharpston stated at paragraph 48 of her Opinion that: '*the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill*'; and
6. Natural England have confirmed that nitrogen deposition from traffic is not preventing the site from achieving its conservation objectives, but rather the principal issue is lack of management. For example, a review of the Natural England condition assessment on a unit by unit basis clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition.

For all these reasons it is considered that the ability of the SAC and SPA to achieve its conservation objectives would not be significantly compromised by Tunbridge Wells Local Plan growth either alone or in combination.

[43] Based on routes suggested by popular navigation software (e.g. Google Maps, Waze)

Recreational Pressure on Ashdown Forest Special Protection Area and Special Area of Conservation

The TWB Local Plan sets out the housing targets for individual parishes in section 5 ('Place Shaping Policies'). Due to the likely small contribution to the overall recreational pressure in Ashdown Forest SPA / SAC, these are not considered individually relevant to this HRA. Instead the cumulative housing development across the borough is considered 'alone' and 'in-combination' with other plans with regards to potentially increasing recreational pressure in Ashdown Forest SPA / SAC.

We have identified the following policy in the Local Plan that provides a quantum and the location of new residential development within the District, which needs to be considered for Appropriate Assessment:

- Policy STR 1 The Spatial Development Strategy.

Background to evidence base

In 2010 a visitor survey of Ashdown Forest SAC and SPA was undertaken[44]. This survey fed into HRA reports of strategic documents at the time. These essentially identified a strategy broadly analogous to that devised for the Thames Basin Heaths; namely the identification of a series of zones around the SAC/SPA each of which triggered a combination of provision of alternative greenspace and improved access management. At that time, a 7km 'outer zone' for Ashdown Forest SAC and SPA was agreed with Natural England[45]. Affected authorities that provided development within this affected 7km 'zone' were required to provide a financial contribution to Suitable Alternative Natural Greenspaces (SANGs), an access strategy (SAMM) for Ashdown Forest and a programme of monitoring and research. This approach was supported by Natural England and the Ashdown Forest Conservators.

In 2016 Footprint Ecology undertook a further visitor survey[46] on behalf of the participating Councils, to provide comprehensive and current data on recreational use of Ashdown Forest. Results from the survey were also to inform the strategic implementation of access management, to tailor the long-term management strategy, and to inform the design and management of SANGs. Ensuring the latter is done appropriately is essential for SANGs to divert recreational pressure away from Ashdown Forest. Overall, the 2016 survey has resulted in a review of the zones, but the 7km zone is still recognised as the core zone requiring mitigation delivery.

Overview of visitor survey results

When considering the relevance of the visitor survey results for the TWB Local Plan HRA, interviewees that visit regularly (i.e. monthly, weekly or daily) are clearly most relevant, because these potentially represent a regular disturbance issue. In the following we therefore focus on results that relate to such regular visitors.

The 2016 survey identified that the 7km zone still captured most of the visitors (including the majority of regular site users) to the SAC/SPA. The survey identified that c. 81% of survey respondents whose postcodes could be mapped lived within 7km of the SAC/SPA boundary[47]. 75% of interviewees that were visiting weekly, lived within 5,952km of Ashdown Forest. It was further highlighted that most interviewees (84%)[48] whose postcodes were mapped were from Wealden District or Mid-Sussex District.

[44] Clarke RT, Sharp J & Liley D. 2010. Ashdown Forest Visitor Survey Data Analysis (Natural England Commissioned Reports, Number 048)
UE Associates and University of Brighton. 2009. Visitor Access Patterns on the Ashdown Forest: Recreational Use and Nature Conservation
[45] UE Associates. October 2011. Habitat Regulations Assessment for the Mid-Sussex District Plan
[46] Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.
[47] A total of 353 respondents out of a total of 434 responses. This is a relevant statistic because the third quartile (75%) is the most widely used basis across the UK to define the primary recreational zone around European sites for which mitigation for additional residents should automatically be provided.
[48] Excluding those who were on holiday or staying with friends or family

Survey results as relevant to Tunbridge Wells Borough

Overall, of the 452 visitors surveyed, a total of 23 visitors had travelled from Tunbridge Wells Borough, accounting for 5% of the visitors interviewed. While this highlights there is a recreational flux from Tunbridge Wells to the Ashdown Forest SPA / SAC, this is clearly considerably lower than for other surrounding authorities. Furthermore, only one visitor originated within the 7km 'mitigation buffer' which has been identified and agreed with all participating local authorities and Natural England on the basis that mitigating all net new housing within that zone will render insignificant the recreational effect of all planned housing growth, irrespective of location.

This is underlined by the fact that the percentage of frequent Ashdown Forest visitors captured if the whole of Tunbridge Wells Borough was included in the mitigation strategy (78.8%) is only marginally higher than if Tunbridge Wells Borough was excluded entirely (78.6%).

Approximately 80% of the Tunbridge Wells interviewees came from the settlements Langton Green, Rusthall and Royal Tunbridge Wells, all of which lie beyond the proposed 7km buffer zone. Langton Green is the closest, located approx. 7.4km from the boundary of the SPA / SAC.

The very low overall contribution of Tunbridge Wells Borough residents to the recreational footprint in Ashdown Forest is likely to be for the following reasons:

- Residents have to travel considerable distances between their homes and Ashdown Forest (7.4km – 14km).
- There are multiple large accessible natural greenspaces closer to these settlements, including Broadwater Forest (Warren), Whitehill Wood, Oxpasture Wood, Pembury Walks, Hargate Forest, Tunbridge Wells & Rusthall Common and Tudeley Woods Nature Reserve. Residents pass some of these sites on their way to Ashdown Forest.
- As shown in several previous studies, distance is a predictor of both the likelihood and frequency of visits. People from further away are less likely to visit and, if visiting, tend to visit infrequently. As such, residents from Tunbridge Wells are less likely to contribute any meaningful recreational pressure in Ashdown Forest.
- Dog-walking, exercising and walking are the most frequently undertaken activities and tend to source their participant pool from under 5km. Therefore, it is likely that the Ashdown Forest SPA / SAC will not be the primary target for these key recreational activities.

Nevertheless, the settlements of Langton Green, Rusthall and Royal Tunbridge Wells do make a small contribution to the visitor pressure in the SPA / SAC, including 3% of all dog-walkers (9 / 302 interviewees) and frequent visitors (11 / 364 interviewees based on people visiting at least once a month).

Effects alone and 'in-combination'

Policy STR 1 (The Spatial Development Strategy) details proposed housing that is located at a significant distance from the SPA / SAC, all being more than 7km distant. However, a small proportion of the dwellings projected to be built within the District will be classed as unallocated windfall and therefore some *could* be located within 7km of Ashdown Forest SAC/SPA, the zone within which 78% of all visitors to the Forest derive. There are several smaller settlements (e.g. Ashurst, Stone Cross and The Green) located within the 7km zone of influence for Ashdown Forest SPA / SAC. Given the small size of these settlements, it is likely that only small-scale windfall applications would occur here. These could, however, operate 'in-combination' with development within 7km of the SPA / SAC set out in the Local Plans for Wealden District and Mid-Sussex District in particular.

To be consistent with other authorities and conform to the Local Planning Authority's adopted Ashdown Forest Practice Note, TWB have adopted a policy (EN 11 – Ashdown Forest Special Protection Area and Special Area of Conservation) confirming the 7km mitigation zone around Ashdown Forest SPA / SAC. This policy states that '*All development that results in a net increase in housing within the 7km defined zone of influence, as set out in the Council's Ashdown Forest Practice Note (2018), will provide a Strategic Access Management and Monitoring (SAMMs) and a Suitable Alternative Natural Greenspaces (SANGs) contribution to address the impact of visitors from new development on Ashdown Forest. Contributions will be sought in accordance with the prevailing*

SAMMs and SANGs Strategy adopted by the Local Planning Authority and in force at the time of the application. Alternative provision(s) for mitigation to address the impact of visitors will only be considered where it can be demonstrated that it will be effective and deliverable over the lifetime of the development. Proposals for major development within, or adjacent to, the zone of influence will be considered on a case-by-case basis in accordance with the requirements of the Habitats Directive to determine what, if any, mitigation is required, including SAMMs and SANGs'. For further guidance please refer to the Practice Note for Ashdown Forest that accompanies the Habitats Regulations Assessment.'

There is a difference in the wording of this policy compared to that in the Regulation 18 Local Plan. In particular, the policy in the Regulation 18 plan referred only to SAMM contributions. The policy in the Regulation 19 plan has been amended to include both SAMM and SANG contributions in line with advice from Natural England.

This is a positive policy because it includes any net increase in housing and considers effects on the Ashdown Forest SAC / SPA. It is considered that, given the small contribution the district makes to recreational pressure in Ashdown Forest, a larger mitigation zone would capture a disproportionately large area of the district relative to the small contribution made by TWB residents to the overall recreational footprint in Ashdown Forest without being materially more effective in addressing recreational pressure. While there is strong scientific evidence to conclude that TWB's contribution to recreation in Ashdown Forest is insignificant, policy EN 11 ensures that the effect of any net new housing within 7km will be subject to appropriate mitigation, according to the SAMM and SANG approach adopted by surrounding authorities. Policy EN 11 also outlines that if proposals for major development within the 7km zone of influence *'…will be considered on a case by case basis in accordance with the requirements of the Habitats Directive to determine what, if any, mitigation is required, including SANGs'*. This ensures that even in the event of major housing development in the south-western tip of the borough, which is not currently proposed, effects on Ashdown Forest SPA / SAC would be mitigated appropriately.

Summary

Overall, it is concluded that the TWBC Local Plan will not result in an adverse effect on the integrity of the Ashdown Forest SPA / SAC through recreational pressure / disturbance either alone or 'in-combination' with other Local Plans.

6. Summary of Conclusions

Impact pathway: Atmospheric pollution

The qualifying features of Ashdown Forest SAC comprise heathland habitat types, all of which are sensitive to air pollution. Moreover, the qualifying species of Ashdown Forest SPA, the nightjar and Dartford warbler, both somewhat rely on heathland habitat for foraging and breeding and are therefore indirectly impacted by increases in atmospheric pollution through changes to habitat. Despite several significant roads, most notably the A26 and A275, traversing the SAC, the Air Quality Modelling Report found that changes to roadside air quality within 200m of Ashdown Forest SAC and SPA as a result of the projected development outlined in the TWB Local Plan in combination with other plans and projects are expected to result in a negligible impact (possibly in the form of a slight retardation effect of air quality improvement) on a small part of the designated site.

Therefore, it can be concluded that there **will be no adverse effects upon the integrity of Ashdown Forest SPA / SAC as a result of increased atmospheric pollution resulting from the Borough of Tunbridge Wells Local Plan.**

Impact pathway: Recreational pressure

Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reducing the breeding success of nightjar and Dartford warbler, which are ground nesting birds and the qualifying features of the SPA. However, Ashdown Forest is over 7km from Speldhurst parish, the nearest settlement with residential allocations in TWB, and research suggests that a very small proportion of the visitors to Ashdown Forest are from Tunbridge Wells. A visitor survey of Ashdown Forest carried out in summer 2016 found that, of 452 visitors surveyed, a total of 23 people surveyed had travelled from TWB, which accounts for 5% of the total visitors to Ashdown Forest SPA / SAC. Nonetheless, in order to be consistent with other authorities, TWB have chosen to be precautionary and confirmed in Policy EN 11 (‘Ashdown Forest Special Protection Area and Special Area of Conservation’) that a SAMMs and SANGs contribution will be required for any development within the 7km zone whilst also addressing the development’s impact on the SAC/SPA.

Therefore, it can be concluded that there **will be no adverse effects upon the integrity of Ashdown Forest SPA / SAC as a result of increased recreational pressure resulting from the Borough of Tunbridge Wells Local Plan.**

7. Appendices

Appendix 1: Screening of Plan Policies

Appendix 1 presents an HRA screening assessment of all the policies within the draft Local Plan, alone and 'in-combination' with other plans. Where policies have been coloured green in the 'Likely Significant Effect' columns, this indicates that the policy does not contain potential impact pathways linking to European designated sites and has been screened out from further consideration. Where policies have been coloured orange in the 'Likely Significant Effect' columns, this indicates that the policy provides for potential impact pathways linking to European designated sites and has been screened in for further consideration in this report.

Policy number/ name	Policy detail	Likely Significant Effect Alone	Likely Significant Effect 'In-Combination' with other plans
Section 4. The Development Strategy and Strategic Policies			
Policy STR1: The Development Strategy	The broad development strategy for Tunbridge Wells borough over the period 2020-2038, as shown indicatively on the Key Diagram (Figure 5), is to ensure that a minimum of 12,204 dwellings and 14 hectares of employment (Use Class B) land are developed, together with supporting infrastructure and services. To achieve this, the Local Plan: 1. Promotes the effective use of urban and previously developed (brownfield) land, having due regard to relevant Plan policies; 2. Looks to focus new development within the Limits to Built Development of settlements, as defined on the Policies Map, where proposals accord with other relevant policies of this Plan; 3. Provides for the growth of settlements, having regard to their role and function, constraints, and opportunities, together with the development of two strategic sites, namely: a. major,transformationalexpansionofPaddockWood(includingintoCapelparish), following garden settlement principles and providing flood risk solutions; and b. the creation of a new garden settlement: Tudeley	Likely Significant Effects Presents This policy identifies the quantum and the location of 12,204 new homes, and 14,000 m^2 of employment floorspace to be provided during the Plan period of 2020-2038. Potential impact	Likely Significant Effects Presents This policy identifies the quantum and the location of 12,204new homes, and 14,000 m^2 of employment floorspace to be provided during the Plan period of 2020-

	Village between Paddock Wood and Tonbridge; 4. Includes an allowance for potential delays or non-delivery of sites; 5. Providesforaprestigiousnewbusinessparktothenorthof NorthFarm/Kingstanding Way, Royal Tunbridge Wells, well connected to the improved A21; 6. ProvidesaframeworkforthepreparationofaholisticAreaPlanforRoyalTunbridge Wells Town Centre; 7. Provides for some reductions in the area of the Green Belt, notably for the strategic sites and around Royal Tunbridge Wells and Pembury, where exceptional circumstances warrant this, and where an effective long-term Green Belt is maintained; 8. Limits development within the High Weald Area of Outstanding Natural Beauty to that which can be accommodated whilst still conserving its key characteristics, this being mostly small-scale, only promoting larger proposals where exceptional circumstances are demonstrated; 9. Normally limits development in the countryside (being defined as that outside the Limits to Built Development) to that which accords with specific policies of this Plan and/or that for which a rural location is fully demonstrated to be necessary.	pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution	2038. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution
Policy STR2: Place shaping and design	All new development must aim to meet high standards of urban and architectural design and have regard to national and local design guidance, including the National Design Guide 2019, the Kent Design Guide, or any subsequent version, and any design guidance adopted by the Council. Where appropriate to the scale of the development, the Council will expect applicants to engage in early and effective discussions with the community and other relevant stakeholders. The Council will require the use of masterplanning, including the use of design codes and sustainable design standards where appropriate, for strategic and larger-scale developments where identified in allocation policies in this Plan. All new development must use the following principles relevant to its location, scale, and use: 1. Respond positively to local character and context to preserve and enhance the quality of existing communities and their environs, as well as taking the opportunity to create a new identity informed by local character and context, where appropriate;	There are no LSEs of this policy alone. This is a policy outlining the development strategy policy of the draft Local Plan. This is a policy outlining the standards relating to urban and architectural	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out

	2. Provide buildings that exhibit architectural quality within well-considered public and private realms; 3. Conserve and enhance assets of historic, landscape, or biodiversity value; 4. Enhance the public realm through additional landscaping, street furniture, public art, and other distinctive features that help to create a sense of place; 5. Seek to promote and encourage social interaction and active and healthy lifestyles; 6. Ensure all components of the proposal, such as buildings, car parking, and new connections, open space, and landscaping, are well integrated as part of the overall design, to be accessible, legible, adaptable, and inclusive to everyone, safe and well related to one another; 7. Prioritise the needs of pedestrians, cyclists, and public transport services; 8. Be based on measures to promote environmental sustainability, including energy and water efficiency measures, sustainable design and construction techniques, and provision of appropriate wastewater and flood mitigation measures; and 9. Protect the amenity of existing and future residents and users with regard to noise, vibration, smell, loss of light, privacy, and overbearing impact. Further detailed policies in relation to place shaping and design are included within the development management policies in Section 6 and also in the individual site allocation policies within the place shaping policies in Section 5 of this Local Plan.	design. It contains the positive provision of protecting and enhancing landscape and biodiversity assets. This policy neither provides the quantum or location of new development. There are no impact pathways present and this policy can thus be screened out.	'in-combination'.
Policy STR3: Brownfield Land	Proposals that provide for the effective use of redundant, disused, or under-utilised brownfield land and buildings in sustainable locations will be supported in principle. In particular: 1. Such proposals within settlements, as defined by their Limits to Built Development, will be encouraged, having proper regard to their detailed impacts, notably design, in accordance with Policy EN 1: Sustainable Design;	There are no LSEs of this policy alone. This is a policy setting out the strategy for redevelopment of brownfield land	There are no LSEs of this policy 'in-combination' with other plans. There are no impact

	2. Such proposals either within, or in short walking distance of, town and rural service centres, as defined in Policy ED9: Defined Town and Rural Service Centres, will be expected to make optimal use of land and buildings in accordance with Policy EN1: Sustainable Design and, where relevant, Policy H 2: Housing Density; 3. Such proposals in the countryside (i.e. brownfield sites outside defined Limits to Built Development) will be supported where: a. first consideration is given to the re-use of existing buildings, including any suitable extensions; b. they are compatible with and, where possible, enhance, the landscape setting and local amenities; c. for residential developments, the site is well related and accessible to a defined settlement and there is, or the development will provide, safe access by foot, cycling, or public transport for a high proportion of trips; d. for all proposals relating to existing brownfield sites in employment use, the criteria in Policy ED2: Retention of existing employment sites and buildings are met; e. if relevant, they represent an appropriate use of a heritage asset or, in respect of enabling development, this is necessary to secure its future, in accordance with Policy EN 5: Heritage Assets; f. there is no unacceptable highway impact and the nature and volume of traffic is otherwise compatible with the local road network; g. they are in accordance with other relevant development plan policies.	but does not promote a quantum or location of development. There are no impact pathways present and this policy can thus be screened out.	pathways present and this policy can thus be screened out 'in-combination'.
Policy STR4: Ensuring Comprehensive Development	A comprehensive approach to site development will be expected to ensure the good planning of the area and, in relation to allocated sites, to ensure that the policy provisions, read as a whole, are achieved. Where sites have several land use elements or are in multiple ownerships, this will be secured by an appropriate means of masterplanning, the form of which will include consideration of: - the strategic significance of the proposal; - the extent of different land uses proposed across the overall site; - whether there are multiple land ownerships forming the allocation. To ensure holistic and fully integrated approaches to the strategic developments proposed in this Local Plan, masterplans for the urban expansion of Paddock Wood (including land in east Capel) and the new garden settlement at Tudeley, will take the form of Supplementary Planning Documents. In all circumstances proper consideration should be given to how the policy requirements (such as access and connectivity, open space, drainage and other infrastructure, as well as affordable housing) relating to the site as a whole, with a phasing plan where appropriate, will be achieved. Delivery will normally be	There are no LSEs of this policy alone. This is a development management policy relating to the protection of landscape character. This is a positive policy that protects, preserves and enhances landscape	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	secured through a legal agreement. The Council strongly encourages, and will have regard to, the level of engagement of relevant stakeholders, including the local community, town or parish councils, service providers, environmental organisations, and other interested parties, in the preparation of masterplans or similar framework documents. Where necessary to achieve the Local Plan's strategic objectives and development strategy, the Council will use its Compulsory Purchase Order powers (and/or work with other authorities to use their Compulsory Purchase Order powers) to bring forward development in a timely and comprehensive way.	character. There are no linking impact pathways present and this policy can thus be screened out	
Policy STR 5: Infrastructure and Connectivity	It is essential that all new development will be supported by the provision of the necessary infrastructure, services, and facilities that have been identified to serve the needs arising from new development in a timely way and will be provided as follows: 1. Where development creates a requirement for new or improved infrastructure beyond existing provision, developers will be required to provide and/or contribute significantly towards the additional requirement being provided, to the agreement of the Council in collaboration with the relevant service provider; 2. Detailed specifications of the site-specific mitigation schemes/contributions required are included in the overarching place shaping policies and individual site allocation policies. Development proposals should seek to make provision for all the land required to accommodate any additional infrastructure arising from that development; 3. Dedicated planning agreements will be used to provide a range of site-specific mitigation in accordance with the Section 106 tests, which will normally be provided on-site but may, where appropriate, be provided in an off-site location or via an in lieu financial contribution. In some cases, separate agreements with utility providers may be required; 4. Infrastructure schemes that are brought forward by service providers will be encouraged and supported where they are in accordance with other policies in the Local Plan; 5. New residential and commercial development will be supported if sufficient infrastructure capacity is either available, or can be provided in time to serve the development; 6. For the identified strategic sites where the provision of a range of significant infrastructureprojectsarerequiredtomitigatetheimpactofdevelopmenttoparticular areas, the delivery of this	There are no LSEs of this policy alone. This is a development management policy relating to the provision of infrastructure and connectivity. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	will be agreed through a masterplanning process; 7. Due to the complexity of monitoring contributions and the delivery of infrastructure, the Council will require the payment of a monitoring fee, which will be secured through Section 106 agreements and agreed between the Council and developers. The following are the strategic priorities for infrastructure provision or improvements within the borough to deliver and support the growth set out in this Local Plan: **Education** Provision will be made for sufficient school places in the form of expanded or new primary and secondary schools, together with early years, childcare, and adult education facilities, with all relevant development contributing to these through land and/or contributions,and strategic developments providing land and contributing to the cost of delivering new schools. Any new provision will be determined through consultation with Kent County Council. **Health** Ensure that essential healthcare infrastructure is provided as part of new development in the form of new or expanded health care facilities. This should include primary and acute care, and any other supporting healthcare facilities, such as social care, that the Council is made aware of through consultation with the West Kent Clinical Commissioning Group or other relevant providers. **Water** Providing an adequate supply of fresh water and dealing with the removal of foul water is essential across the whole borough as part of any planned growth, and Southern Water and Southeast Water as the regulatory bodies have been fully consulted as part of the plan preparation process to ensure that the necessary provision is delivered in a timely way in accordance with Policy EN 24: Water Supply, Quality, and Conservation. Taking account of flood risk and the implications of proposed growth in areas that are at risk of flooding, and ensuring that any risk is not exacerbated but in fact improved, is a key priority of the Local Plan. Close liaison is required with Kent County Council as the Lead Local Flood Authority and the Environment Agency to ensure that adequate consideration is given to any development in flood prone areas and that appropriate mitigation and compensatory measures are put in place where necessary in accordance with Policies EN 25: Flood Risk and EN 26: Sustainable Drainage.		

	Utilities and Digital Infrastructure utilities Ensure that the provision of digital infrastructure and other utilities is supported, including that provided strategically, and for developers to ensure that such infrastructure is provided within sites from their point of connection to the strategic network to individual buildings in accordance with Policy ED3: Digital Communications and Fibre to the premises (FTTP). Community, public, and social services A range of community, public, and social services will be provided to support the needs of a growing population, including library provision, community centres and hubs, youth and adult services, as well as any additional emergency services as identified by the relevant lead agencies. **Sport and Recreation** Appropriate access to formal and informal sport and recreation provision will be provided as part of all new development to promote wellbeing and opportunities for sport and recreation to meet the needs of all communities across the borough. A borough-wide Sports Strategy has been developed in accordance with Policy OSSR 1: Retention of Open Space and OSSR 2: The Provision of Publicly Accessible Open Space and Recreation and a range of provision has been identified and provided for to support the growth over the plan period and will include indoor and outdoor sports provision, playing pitches, parks and recreation grounds, children's and youth play space, as well as amenity and natural green space. **Green, grey, and blue Infrastructure** Multi-functional green, grey, and blue infrastructure will be provided in both the rural and urban areas through a strategically planned and delivered network of high quality formal and informal green spaces and landscape features, including parks, open spaces, playing fields, play spaces, woodlands, hedgerows, green routes, water features, allotments, street trees, and community orchards. The Council has prepared a Green Infrastructure Framework 2019 to guide the provision of green, grey, and blue infrastructure and further detail is provided by Policy EN 14: Green, Grey, and Blue Infrastructure. **Waste and recycling** Provision will be made for sufficient waste capacity in the form of expanded or new waste infrastructure, with all relevant developments contributing to these through land and/or contributions and strategic developments providing land and contributing to the cost of delivering new waste infrastructure. Any new provision will be determined through consultation with Kent County Council. **Public Realm, Art, and Culture** Development across the borough should incorporate opportunities for the inclusion of increased art and cultural opportunities. Infrastructure will be provided to mitigate the impact on cultural need through the provision of buildings and spaces that allow for increased or improved cultural opportunities, and through the		

	provision of public art and the recognition of heritage assets. **Transport** The strategic approach to transport provision is included within Policy STR 6: Transport and Parking. The Council's Infrastructure Delivery Plan (IDP) will support the growth in the Local Plan. The IDP identifies the scope of infrastructure to be provided, the phasing of such infrastructure linked to the planned development, and the mechanisms by which the Council considers that the infrastructure will be delivered, including the use of Section 106 agreements, Infrastructure Levy, or equivalent policy as applicable.		
Policy STR 6: Transport and Parking	The transport and parking strategy is to: 1. Deliver future development within close proximity to existing settlements across the borough, or will be of a scale which supports the necessary infrastructure and services to allow the community to function self-sufficiently on a day to day basis; 2. Provide an integrated and comprehensive approach to transport provision, which offers choice and prioritises a) active travel and then b) public transport (rail, bus, car club, car share, and taxi), as an alternative means of transport to the private car whilst ensuring that c) there are necessary improvements to the existing highway network and infrastructure to mitigate and address the impact of development to an acceptable degree and ensure high way safety. This will include working with partners at both the strategic and local levels 3. As such the strategy will: - through the location of new development and the provision of active travel infrastructure maximise the internalisation of trips within settlements, both from new and existing development, thereby reducing the impact on the highway network through new development; - enable opportunities to be taken in relation to changing transport technology and usage, particularly in relation to personal electrical vehicles; - through providing alternatives to emission producing private car use support opportunities for improving air quality within the borough in accordance with Policy EN 21 (Air Quality); **Active Travel** Active travel (walking and cycling, and emerging electrical personal vehicles) will be prioritised through: 1. The creation of Low Traffic Neighbourhoods in the Main Urban Area (Royal Tunbridge Wells and	There are no LSEs of this policy alone. This is a development management policy detailing changes to the transport network and parking provision. Furthermore, it contains the positive provision of expanding the local cycling and public transport, which might lead to a reduction in the use of private motor vehicles. This policy neither provides the quantum or location of new development.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Southborough) and surrounds (Bidborough, Langton Green, and Rusthall), with enhanced, legible and safe cycling, pedestrian, and electrical personal vehicles routes delivered in line with the Council's Local Cycling and Walking Infrastructure Plan (evidence base and Active Travel Supplementary Planning Document). Such routes will also be provided in other settlements, including through the use of a Local Cycling and Walking Infrastructure Plan in Hawkhurst; 2. The development and delivery of the strategic sites (Paddock Wood including land in east Capel) and Tudeley Village) proposed in this Local Plan will have integrated active travel as a fundamental element to their layout and design, so that settlements are easy to navigate on foot or by bike, both in new development and through existing areas of settlements to access their centres and services; 3. The provision of inter-settlement walking, cycling, electrical personal vehicle and non-motorised user routes, into the centres, or key destinations, within settlements, including through enhancing routes such as Public Rights of Way for users of non-motorised transport. This will include links to destinations outside the borough, including Tonbridge; The provision of improved cycle parking and e-bike charging points and bike share opportunities. **Public Transport** The Council will work with partners to maximise use of public transport (rail, bus, car club, car share, and taxi), as an alternative means of transport to the private car by: 1. Establishing rapid bus/transport links, including from Paddock Wood to Tunbridge Wells, and Paddock Wood to Tonbridge (via Tudeley Village), and Tunbridge Wells to Tonbridge, and ensuring that the design of these strategic sites provides for attractive bus services with convenient access to the highway network; 2. Working with Network Rail and the Train Operating Company to provide station infrastructure improvements where necessary, and working strategically to retain and improve the rail network by increasing the attractiveness of travelling by rail, including to multiple destinations; 3. WorkingwithKentCountyCouncilandbusoperatorstoretainandenhanceexisting bus services and infrastructure, as well as exploring options for innovation vehicle-types and in demand responsive services; 4. Requiring robust travel plans for relevant developments (see Policy TP1: Transport Assessments/Statements and Travel Plans) to maximise opportunities for car sharing and mini-bus/shuttle bus use, opportunities for employers to stagger arrival and departure times to places of	Therefore, there are no impact pathways present and this policy can thus be screened out.	

	employment to avoid peak times, and residential developers to provide facilities for home or co-working; 5. Supporting the expansion of car clubs (which allow the booking/use of vehicles kept on publicly accessible land by individuals for a number of hours at a time) and opportunities for car sharing. **Highway Network** The Council will work with Kent County Council and Highways England to deliver strategic and local highway improvements to mitigate and address the impact on the highway network. These measures will be funded by development, although other funding opportunities will be investigated. A full list of the mitigation measures are provided in the Infrastructure Delivery Plan, but include: - part off-line, part-online improvements to the A228, as shown on the Policies Map; - theprovisionofahighwaylinkbypassingFive-OakGreen,asshownonthePolicies Map; - measures along the A228/A264, including junction capacity improvements at Woodsgate Corner and a roundabout at the Pembury Road/Halls Hole Road/ Blackhurst Lane. The routes for major and strategic road improvements, including a route for an entirely offline A228 strategic link (Colts Hill bypass) as part of the wider major roads network(to deliver wider economic benefits and links to north-east Kent, and potentially the Lower Thames Crossing), and the duelling of the A21 from Kippings Cross to Lamberhurst will be safeguarded– see Policy TP6 Safeguarding Highways. **New and emerging technology** TheCouncilwillrealiseopportunitiesforchangingtransporttechnologyandusagethrough: 1. Incorporating electric car charging points (or any new technology requirements) into new developments, and where possible into existing public and private car parks and suitable street furniture; 2. Exploring the potential for incorporating innovative smart travel solutions resulting from emerging transport technology and initiatives, such as Demand Responsive Transport (DRT), and Mobility as a Service (MaaS), into transport planning and new developments. **Design** The Council will ensure that transport infrastructure development or improvement schemes (including public realm and other works to historic routes, surfaces, and street furniture) take every opportunity to improve or enhance the historic environment and green, and blue infrastructure, and landscape connectivity in		

	accordance with the guidance in Historic England's national and regional Streets for All: Advice for Highway and Public Realm Works in Historic Places guidance. **Car parking** Car parking policy is set out in Policy TP 3: Parking Standards. The Council, as Local Planning Authority, will be closely involved with the Council's forthcoming Parking Strategy, to ensure an integrated approach to parking, transport, and land use planning.		
Policy STR7: Climate Change	All development within the borough will recognise the Climate Emergency and be supportive of the Council's ultimate target to achieve net zero emissions across the borough by 2030.This will be achieved by: **1. Effective spatial planning** Land use planning for the distribution of people and activities that allows for radical reductions in greenhouse gas emissions, including: a. reducing the need to travel, especially by private car; b. securing the maximum possible journeys made by active and sustainable transport for both people and freight; c. delivering a step change in energy efficiency improvements. **2. Implementing proactive policy on climate change mitigation** A proactive policy for low carbon design and construction will be implemented that follows the energy hierarchy (see the Glossary at Appendix 4) and supports the delivery of appropriate renewable energy generation. The embodied energy of existing buildings will be considered by prioritising restoration over demolition, and decentralised heating and cooling networks will be given particular consideration in the largest strategic development locations. **3. Implementing proactive policy on climate change adaptation** Development will be supported that minimises vulnerability and allows for communities, infrastructure, buildings, and ecology to adapt to the impacts of climate change, including: a. protecting existing green spaces and creating new, appropriate green infrastructure whilst balancing the need for built development; b. not increasing, and wherever possible reducing, surface water run off through the use of permeable	There are no LSEs of this policy alone. This is a positive policy outlining the response to climate change. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	surfaces and Sustainable Drainage Systems; c. avoiding overheating within buildings and the urban heat island effect; d. improving the efficiency of water use. **4. Partner engagement** The most effective and appropriate approaches, interim targets in actions plans, etc. will be determined by engagement with appropriate partners, including utility providers, communities, health authorities, regulators and emergency planners, statutory environmental bodies, local nature partnerships, local resilience forums, and climate change partnerships.		
Policy STR 8: Conserving and enhancing the natural, built, and historic environment	Development is expected to make a positive contribution to the natural, built, and historic environment of the borough. This includes landscape assets, biodiversity, geodiversity, priority habitats and species, statutory and locally designated sites and areas, and archaeological assets. This will be achieved by the following approach: 1. Development should contribute to, and enhance, the urban and rural landscapes of theborough,withparticularregardtothedesignatedHighWealdAreaofOutstanding Natural Beauty (AONB); 2. The landscape character of the borough will be protected through retention and enhancement of the key characteristics or valued landscape features and qualities, as well as through the restoration of landscape character, in accordance with the objectives of the Borough Landscape Character Assessment; 3. Development proposals must be informed by a clear understanding of thelandscape context (on- and off-site) and demonstrate how it has incorporated and enhanced site characteristics and landscape features, avoiding and minimizing harm wherever possible.Landscape mitigation,wherer equired,should be identified at the outset of the scheme design process to ensure that proposals are truly landscape-led and should be used to reinforce and restore landscape character. All new landscaping should make a positive contribution to landscape character; 4. Within the area designated as AONB, and its setting, development will be managed in a way that seeks to conserve and enhance the natural beauty of the area, commensurate with the "greatweight" afforded to AONBs within the NPPF. Applicants will be expected to demonstrate (through relevant documentation submitted as part of a planning application) how proposals have had regard to the objectives of the High	There are no LSEs of this policy alone. This is a positive policy outlining the aim to conserve biodiversity, priority habitats and species, and statutory designated sites. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Weald AONB Management Plan. Proposals for 'major'1development in the AONB will only be allowed in exceptional circumstances and where it is in the public interest. In such instances, effective mitigation should form an integral part of the development proposals; 5. A hierarchical approach to nature conservation and the protection of biodiversity will be applied across the sites and habitats of national, regional, and local importance within the borough. The objective is to achieve net gains for nature and protect and enhance sites of geological interest across the whole borough and where possible to secure the long-term management of sites, areas, and features important for biodiversity and geodiversity; 6. Opportunities and locations for biodiversity enhancements will be identified and pursued by the creation, protection, enhancement, extension, and long-term management of green corridors and through the development of green infrastructure networks in urban and rural areas to improve connectivity between habitats; 7. The designated and non-designated heritage assets of the borough, including historic field patterns, routeways, listed buildings, conservation areas, Scheduled Ancient Monuments, archaeological sites, and Historic Parks and Gardens, will be conserved and enhanced, and special regard will be had to their settings; 8. Regard shall be given to the Historic England Conservation Principles and the Council's Historic Environment Review, which identifies historic environment themes particular to the borough; and 9. The positive management of heritage assets through partnership approaches and measures will be encouraged, Including by the use of conservation area management plans.		
Policy STR 9: Green Belt	An effective Green Belt will be maintained through the application of national planning policy and relevant polices in this Local Plan, to meet the fundamental aim of preventing urban sprawl by keeping Green Belt land permanently open. This Plan removes land from the Green Belt which has been fully justified through the consideration of reasonable alternatives and it is supported by 'exceptional circumstances'. The areas of Green Belt proposed to be released are set out in the relevant Place Shaping Polices and include requirements to secure improvements to the environmental quality and accessibility of the surrounding Green Belt. 'Inappropriate development' in the Green Belt, as defined in the NPPF, will have to demonstrate very special circumstances which will need to outweigh the harm to the Green Belt by reason of inappropriateness, and any other harm. The Council will seek improvements to the environmental quality and accessibility of the	There are no LSEs of this policy alone. This is a development management policy relating to the preservation of the Green Belt. This policy	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and

	surrounding Green Belt from all relevant development2 within the Green Belt, including if appropriate in the form of financial contributions. This may relate to opportunities to provide access and outdoor sport and recreation; to retain and enhance landscapes, visual amenity, and biodiversity; or to improve damaged and derelict land.	neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	this policy can thus be screened out 'in-combination'.
Policy STR 10: Neighbourhood Plans	The preparation and production of Neighbourhood Plans will be supported by the Council, including in relation to providing environmental, economic, and social data and mapping, scoping, Strategic Environmental Assessment requirements, advice on plan production and drafting of policies to meet the'basic conditions',as well as by providing the resources necessary to undertake the latter stages for which the Council is responsible in a timely manner. For clarity, an up to date made Neighbourhood Plan forms part of the statutory development plan for the borough and, as such, planning applications will be determined in accordance with that Plan where a proposal is in its area, as well as the adopted Local Plan. Neighbourhood Plans will be given increasing weight as they progress through their formal stages. In the event of overlaps or conflicts with non-strategic Local Plan policies, particular regard will be given to the respective stages of plan making and to the locally-specific focus and evidence base of relevant Neighbourhood Plan Policies. This provision increases significantly when there is a post-examination draft Neighbourhood Plan.	There are no LSEs of this policy alone. This policy outlines the Council's support for Neighbourhood Plans. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Section 5: Place Shaping Policies			
Royal Tunbridge Wells			

Policy STR/RTW 1: The Strategy for Royal Tunbridge Wells	The strategy for the unparished area at Royal Tunbridge Wells, as defined on the Policies Map (Inset Map X), is to: 1. Deliver approximately 1,416-1,486* new dwellings including affordable housing, on 18 sites allocated in this Local Plan in the plan period (Policies STR2 and AL/RTW1, ALRTW3-ALRTW7, ALRTW9-ALRTW16, ALRTW21-ALRTW23. Of these sites, the following already have planning permission: AL/RTW1 for 108 dwellings, ALRTW4 for 89 units, AL/RTW9 for 69 units and AL/RTW10 for 30 dwellings; 2. Provide additional housing which may be delivered through the redevelopment and intensification of allocated sites and other windfall development inside the defined LBD; 3. Make the best use of previously developed land by the intensification of uses/sites whilst still protecting the town's important character and heritage; 4. Provide significant employment growth through the allocation of new business parks to be located at Land adjacent to Longfield Road to deliver approximately 90,000 sqm floorspace of new employment (Class E(g)(iii), B2 and B8); 5. Promote the retention, expansion, and intensification where relevant of existing employment premises and supporting leisure uses within the Key Employment Areas; 6. Develop a strategy for the Town Centre to provide the framework for the development of a future Town Centre Area Plan to ensure the long term vitality and viability of the centre over the Plan period; 7. Provide for a number of mixed use developments to deliver a range of uses providing employment as well as private and public services and facilities across the town; 8. Support active travel by delivering improvements to the local pedestrian and cycling network as set out in the Local Cycling and Walking Infrastructure Plan, including low traffic neighbourhoods and additional cycle parking in key locations. This will include through the provision of contributions; 9. Support improvements to the local bus network and infrastructure; 10. Deliver measures to reduce congestion on the radial routes into the town including the A26 and A264, while prioritising active travel. This includes the provision of a new roundabout at the junction	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes, employment land and retail space. A total of 1,416-1,486 homes and 90,000 m^2 of employment space is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.

	of Halls Hole Road, Pembury Road and Blackhurst Lane; 11. Plan for the expansion of electric vehicle charging points and car club; 12. Plan for the expansion of a number of existing secondary schools across the town; 13. Plan for the extension of St Peter's Primary School at Hawkenbury by one Form of Entry and Skinners Kent Primary School at Knights Wood by one Form of Entry to provide two forms of entry as and when needs require based on projections of pupil numbers and advice from Kent County Council Education over the course of the plan period; 14. Allocate land to provide for two new medical centres, at the TN2 Centre and at land at Showfields and Rowan Tree Road; 15. Allocate land to provide for a new sports hub at Hawkenbury Recreation Ground, to provide expanded and enhanced facilities to include standing/seating for supporters and other ancillary structures as well as the identification of a number of local sports hubs to be recognized as areas of future enhancements/expansion to meet a variety of sporting provision at the Nevill Sports Ground, Bayham East and St Marks Recreation Ground; 16. Provide for allotments, amenity/natural green space, parks and recreation grounds, children's play space and youth play space as required to meet needs and mitigate the impact of future development; 17. Retain and protect the existing public car parks within Royal Tunbridge Wells, as defined on the Policies Map; 18. Seek developer contributions, either in kind (normally land) and/or financial, from residential and/or commercial schemes to be used towards the provision of the above.		
Policy STR/RTW2 – Royal Tunbridge Wells Town Centre	Within the defined Royal Tunbridge Wells Town Centre, as defined on the Royal Tunbridge Wells Policies Map and set out within Policy ED9, this Local Plan sets out the framework for the provision of a Royal Tunbridge Wells Town Centre Area Plan setting out a strategic vision for the town centre over the plan period based on the following approach: 1. An overall vision for Royal Tunbridge Wells town centre building on its current success but setting out a flexible and adaptable approach to future uses and sites and ensuring the comprehensive and sustained development of the centre;	There are no LSEs of this policy alone. This policy identifies the location of new	There are no LSEs of this policy 'in-combination' with other plans.

	2. A mix of town centre uses to provide commercial, employment, cultural, and residential development to sustain the town's future vitality and viability. Schemes should provide a balanced mix towards meeting the requirements for town centre uses and housing delivery, whilst respecting and enhancing the town's distinct heritage and cultural assets; 3. The enhancement and creation of new public realm to be at the heart of any redevelopment or new development to improve the attractiveness of the centre and to facilitate events and cultural activities; 4. Improved connectivity and legibility between the core areas of the town centre and the wider town, alongside improved parking and active travel infrastructure, including: a. pedestrian and cycle friendly environments, with associated environments and infrastructure, including developments being designed on the basis of Low Traffic Neighbourhoods, and to link with adjacent Low Traffic Neighbourhoods; b. enhancement of the local bus network and associated infrastructure; c. extensionofexistingnetworkofelectricvehiclechargingpointsandthecarclub; d. sufficient parking to support the range of town centre uses; 5. The protection of the core retail areas alongside sensitive rationalisation of some peripheral areas to reflect changing needs and requirements. In particular, ground floor active retail and leisure frontages should be retained, whilst consideration is given to other uses such as residential and offices above; 6. The provision of enhanced leisure, tourism, and cultural facilities to enable a prosperous and thriving town centre attractive to residents and visitors; 7. Retentionofappropriateofficespaceandreconfiguration/repurposingofnewspace to enable modern and sustainable ways of working throughout the plan period to ensure the economic prosperity of the town centre; 8. Increased residential development as part of the appropriate mix of uses within the town centre to ensure a vibrant and viable centre. In addition to those sites which already have planning permission, or are subject to detailed allocations below, at least 150-200 additional residential units will be	homes, employment land and retail space. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.

	provided in the town centre. 9. The above will be delivered through the prioritization of the delivery of the Area Plan, and the continued promotion and support of proposals and schemes which contribute positively towards the range of uses within the town centre including for retail, leisure, service and residential uses. Within the town centre the enhancement and/or redevelopment of a number of key sites are considered key to the realisation of this strategy as identified on the Policies Map and set out below, including: • the Royal Victoria Place shopping centre, Calverley Road; • the existing civic complex (including the Town Hall, Assembly Hall Theatre and Police Station); • the former cinema site, Mount Pleasant Road; Mount Pleasant Avenue car park and the Great Hall car park and surrounds; • Torrington and Vale Avenue.		
Policy STR/SO 1: The Strategy for Southborough	The development strategy for Southborough is to: 1. Set Limits to Built Development for Southborough on the Policies Map (Inset MapX) as a framework for new development over the plan period; 2. Build approximately 42 new dwellings on two sites (Policies AL/SO1 and AL/SO3), including affordable housing, allocated in this Local Plan in the plan period. Of these sites, AL/SO1 already has planning permission for 16 dwellings; 3. The South borough Hub Recreation area is identified as a local sports hub as partof the Sports Strategy approach for the Main Urban Area; 4. Protect and retain the public car park(s) within Southborough, as defined on the Southborough Policies Map; 5. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. one new health facility to replace an existing facility;	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 135-205 homes (85 of which have an existing planning permission) is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'.

	b. new play space provision to reduce gap in access to provision; c. enhancements to natural greenspaces at Barnetts Wood and Southborough Common; d. additional natural greenspace and food growing areas/allotments; e. recreation and sports provision at Hawkenbury – site allocation AL/RTW 19, and/or at Land at and adjacent to Rusthall recreation ground, Southwood Road, Rusthall - site allocation AL/SP2; f. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/SS 1: The Strategy for Paddock Wood and East Capel	Significant growth around Paddock Wood and East Capel is proposed to deliver approximately 3,490-3,590 houses, as defined on the Policies Map. The development strategy for Paddock Wood and East Capel is to: 1. With policies STR/PW1 (the Strategy for Paddock Wood (Parish) and STR/CA1 (the strategy for Capel parish) set an illustrative Limits to Built Development for Paddock Wood, including land at East Capel, on the Policies Map (inset Map X) as a framework for the provision of an extended settlement over the plan period and beyond.Thisis facilitated through the release of Green Belt land; 2. Provide for the expansion of Paddock Wood and East Capel, which will deliver the following, on the broad locations as identified at Figure X: a. up to 3,590 dwellings; b. three neighbourhood centres providing around 2,000sqm commercial floorspace (Class E). The boundary of the neighbourhood centres will be defined through the Framework masterplan; c. two 2FE primary schools; d. a new sports and leisure hub, which could incorporate a swimming pool, indoor and outdoor sports,	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of up to 3,590 homes in Paddock Wood and East Capel is to be delivered in the 2020-2038 Local Plan period. Furthermore, a proportion of approx. 4,000	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'.

	and the potential for a co-located health centre: e. three pitch gypsy/traveller sites (to include one mobile home and one touring caravan per pitch); f. significant new land for employment uses, revitalising local employment, and with walkable links from the new neighbourhoods; g. a town-wide system of paths and cycle routes, linking out of the town to nearby villages and leisure routes such as the Hop Pickers Trail; h. a new north-south link over the railway line to the west of the town, linking neighbourhoods and public facilities; i. a Paddock Wood 'Wetland Park', a county quality water-based activity facility for sport, leisure and recreation based around locally distinctive habitats which also controls flood water before it leaves the site; j. a community hub; 3. Provide a mix of housing types, size and tenure to be provided to ensure a balanced, inclusive and accessible community. The exact mix to be agreed with the Local Planning Authority at the planning application stage. A minimum of X% affordable housing should be provided on site and phased through the development; 4. Provision to be made for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of the elderly. At least least one sheltered and one extra care housing scheme shall be provided within the strategic site; 5. Ensure the development champions the garden settlement principles. Planning applications need to demonstrate consideration of the associated key qualities as outlined in the supporting text (para. X); 6. Secure the phased delivery of highway and transport infrastructure including on and offline improvements to the A228 around Colts Hill and the provision of a new highwaywhich bypasses Five Oak Green as	dwellings will be delivered in conjunction with housing to be delivered in Paddock Wood. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.

	shown on Map X; 7. Provide new and improved bus connections to the planned new residential areas with Paddock Wood town centre, and the employment areas to the north of the railway line; 8. Provide walking and cycling linkages within the site, together with links to Paddock Wood town centre and surrounding countryside; 9. For development on land to the west, edged in blue on Figure X, to provide compensatory improvements to the Green Belt; 10. Consider the potential for mineral deposits on the land edged in blue and yellow on Figure Y, and any viably workable minerals should be extracted prior to development commencing on the site; 11. Incorporate zero and low carbon energy production during early design stages to provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles fundamental to the design,constructionand operation stages; 12. Ensure a drainage strategy is in place, in consultation with the Local Planning Authority, Kent County Council as the Drainage Authority and Southern Water prior to the grant of planning permission for any substantial development on the site, unless exceptional circumstances arise. This should demonstrate that the development will not exacerbate flooding elsewhere n. The development should also deliver storage, attenuation and mitigation measures to reduce the flood risk to particular residential areas in Paddock Wood; 13. Provide a scheme for the management and funding for green spaces and green infrastructure for both amenity and biodiversity for the lifetime of the development; 14. Secure developer contributions towards the strategic growth of this area and Land at Paddock Wood, either in kind (normally land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study (December 2020) (or a version of this document as amended), to include: a. highway improvements and mitigation measures, including:		

	i. on and off line works to the A228; ii. new bypass around Five Oak Green; b. provision, improvements and enhancement to bus, cycle routes and cycle corridors; c. primary and secondary education provision; d. health and medical provision; e. utility provision and upgrades; f. flood defences and mitigation measures; g. improvements and enhancement to sports and recreation provision including child and youth play space; h. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind. The development will be delivered through the production of four Framework Masterplan Supplementary Planning Documents (SPD). This will relate to an overall Structure Plan for the planned growth, and three further SPDs in relation to the following parcels of land, as shown in Figure Y: 1. North western parcel (edged in blue); 2. Northern parcel (edged in red); 3. South eastern parcel (edged in yellow). These Framework Masterplans will guide developers and the Local Planning Authority in respect of the garden settlement principles as we seek to create a new community at Paddock Wood. The SPD will set out guidance to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site. It will provide guidance on design, phasing and site access to ensure		

	comprehensive development and strong assimilation with the existing settlement at Paddock Wood. Proposals for the piece meal development of individual sites within the settlement will not be supported. Planning applications for development within this area should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application. It is highly likely the delivery of the development will require land equalisation agreements. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach.		
Policy STR/SS 2: The Strategy for Paddock Wood Town Centre	Within Paddock Wood Town Centre, as indicated on the Policies Map, this Local Plan shall set out the framework for provision of a Paddock Wood Town Centre Masterplan Supplementary Planning Document, setting out the strategic vision for the town centre over the plan period based on the following approach: 1. The definition of the extent of the Town Centre, including the identification of a primary commercial area; 2. A mix of town centre uses to provide commercial, leisure, residential and employment uses to sustain the town's future vitality and viability; 3. Increased residential development as part of the appropriate mix of uses within the town centre to ensure and vibrant and viable centre; 4. Provision of key pedestrian and cycle friendly environments, including linkages to the residential and employment areas beyond the town centre boundary; 5. Additional and improved linkages across the railway line for vehicles, pedestrians and cyclists; 6. Identification of key development sites, to deliver the policy considerations above and ensure the strategically planned growth of the town centre and careful integration to the expanded settlement at Paddock Wood and east Capel; 7. Rationalisation of car parking, including the provision of new (potentially multi-storey) car parks, to replace the potential loss of existing surface car parking;	There are no LSEs of this policy alone. This policy does not identify a specific a quantum and the location of new homes, employment land and retail space. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development

	8. Seek developer contributions, either in kind (normally land) and/ or financial, from residential schemes to be used towards the infrastructure asset out in the Strategic Sites Masterplanning and Infrastructure Study (December 2020) (or a version of this as amended). Proposals for the development within the town centre will not be supported that do not follow the principles set out within the Framework Masterplan.	screening assessment a conclusion of no LSEs is reached.	(STR 1) and economic (ED 1) policies have been screened in.
Policy STR/SS 3 The Strategy for Tudeley Village	A new garden settlement will be provided at Tudeley Village, as defined on the Policies Map. The development strategy for Tudeley Village is to: 1. Set an illustrative Limits to Built Development for Tudeley Village on the Policies Map (insert Map X) as a framework for the provision of a new garden settlement over the plan period and beyond; 2. Provide a new garden settlement which will deliver the he following, as identified at Figure Z: a. up to 2,800 dwellings (2,100 by 2038); b. a main village centre and up to three neighbourhood centres comprising a range of shops, services and employment uses of an appropriate scale to serve the new settlement. To include community and leisure facilities. The boundary of the village centre to be determined as part of the Framework Masterplan SPD; c. provision of employment floorspace; d. a 6FE secondary school to the south east of Tudeley Village; e. 3FE primary school; f. open space, leisure and recreation areas, including formal and informal space, children's and youth play space, sports pitches and allotments; 3. Provide a mix of housing types, size and tenure to ensure a balanced, inclusive and accessible community. A minimum of 5% self and custom built homes, and X – Y%	There are no LSEs of this policy alone. This policy identifies a specific a quantum and the location of new homes (2,8000 with 2,100 by 2038), employment land and retail space. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have

	affordablehousing,shouldbeprovidedonsiteandphasedthroughthedevelopment; 4. Provision to be made for accommodation to deliver mixed communities, including provision for those with different accommodation needs, including those of the elderly. At least least one sheltered and one extra care housing scheme shall be provided within the strategic site; 5. Ensure the development champions the garden settlement principles. Planning applications need to demonstrate consideration of the associated key qualities as outlined in the supporting text (para. X); 6. Secure the phased delivery of highway and transport infrastructure including on and offline improvements to the A228 around Colts Hill and the provision of a new highway which bypasses Five Oak Green as shown on Map X; 7. Requires a high quality layout and design. In particular: a. the layout should provide good levels of permeability to encourage more sustainable modes of transport. Walking and cycling linkages to be provided within the site, together with links to Tonbridge, Paddock Wood and the surrounding countryside; b. consideration should be given to the key landscape characteristics, views and the setting of the High Weald AONB; c. particular respect should be given to the setting of heritage assets, especially All Saints Church; d. zero and low carbon energy production to be incorporated to provide an exemplar scheme with climate change mitigation and adaptation measures and sustainable development principles fundamental to the design, construction and operation stages; e. high density development around the village centre and other key points within the development should be maximised in line with other design considerations; f. the design should incorporate means to ensure there is appropriate visual separation between Tudeley Village and Five Oak Green including potentially the use of structural planting on land outside of the allocation, but within the wider land ownership;	assessment a conclusion of no LSEs is reached.	been screened in.

	g. where possible, overhead power cables should be 'underground'; 8. Provide compensatory improvements to the Green Belt; 9. Consider the potential for Tunbridge Wells Sand Formation Mineral deposits across the site. Planning applications will need to be accompanied by a minerals impact assessment in line with the requirement of the Kent Minerals and Waste Local Plan; 10. Ensure a drainage strategy is in place, in consultation with the Local Planning Authority, KCC as the Drainage Authority and Southern Water prior to the grant of planning permission for any substantial development on the site, unless exceptional circumstances arise. This should demonstrate that the development will not exacerbate flooding elsewhere in the vicinity, particularly from Alder Stream at Five Oak Green. The compensatory improvements to the Green Belt should also deliver storage, attenuation and mitigation measures to reduce the flood risk to particular residential areas in Five Oak Green; 11. Provide a scheme of management and funding for green spaces and green infrastructure for both amenity and biodiversity for the lifetime of the development; 12. Secure developer contributions towards the strategic growth of this area and Land at Paddock Wood, either in kind (normally land) and/or financial, as set out in the Strategic Infrastructure Framework November 2020 (or a version of this document as amended), to include (Officer Note: TBC on receipt of final Structure Plan): a. highway improvements and mitigation measures, including: i. on and off line works to the A228; ii. new highway to bypass around Five Oak Green; a. provision,Improvementsand enhancementtocycle routesand cycle corridors; b. primary and secondary education provision; c. health and medical provision; d. improvements and enhancement to sports and recreation provision including child and youth play space; e. utility provision and upgrades; f. othernecessarymitigationmeasureswhicharedirectlyrelatedtothedevelopment and fairly and reasonably related in scale and kind.		

	The development will be delivered through the production of a Framework Masterplan Supplementary Planning Document (SPD) to guide development in respect of the garden settlement principles and creation of a new community at Tudeley Village. The SPD will set out broad principles to show how the above policy requirements, together with other policies within this Local Plan, should be delivered on the site and will the phasing for delivery of the key elements and associated infrastructure. The SPD will need to ensure all elements of the proposals are considered comprehensively, following a masterplan approach. Proposals for the piece meal development of individual sites/elements within the settlement without the comprehensive masterplan approach will not be supported. Planning applications for development within this area should be assessed by a Design Review Panel, at least once at pre-application stage and once following submission of a planning application. The Council will, if necessary, use its Compulsory Purchase Order powers to ensure the delivery of the appropriate masterplanned approach, including the delivery of infrastructure.		
Policy STR/PW 1 The Strategy for the parish of Paddock Wood	This policy should be read with Policy STR/SS1: The Strategy for land at Paddock Wood including east Capel and Policy STR/SS 2: Paddock Wood Town Centre. At the parish of Paddock Wood, as defined on the Policies Map, proposals shall accord with the following requirements: The development strategy for Paddock Wood parish is to: 1. With Policy STR/SS1: The Strategy for Land at Paddock Wood including east Capel, set illustrative Limits to Built Development for Paddock Wood on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Deliver approximately 3,490-3,590 dwellings and accompanying infrastructure through the planned extension to Paddock Wood (including land in Capel parish) (Policy X); 3. Deliver approximately 30 dwellings, commercial and leisure uses through the planned revitalisation of the town centre of Paddock Wood and east Capel (Policy X);	There are no LSEs of this policy alone. This policy identifies a specific a quantum and the location of new homes (up to 4,032), employment land and retail space. Potential impact pathways are present: • Recreational Pressure /	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-

	4. Deliver approximately 412 dwellings (40% affordable) at Land at Mascalls Farm (Policy X) – this includes 313 which already have planning permission; 5. Deliver a 2 FE expansion to the existing Mascalls Secondary School; 6. Provide a community hub; 7. Ensure all development contributes to the provision of flood storage/ attenuation/ mitigation measure and flood defences works to reduce the flood risk to particular areas of Paddock Wood and east Capel; 8. Consider the setting of the AONB for sites outside the AONB but within the High Weald National Character Area, or close to the boundary of the designated AONB landscape; 9. Avoid built development on slopes to the south of Paddock Wood; 10. Seek developer contributions, either in kind (normally land) and/ or financial, from residential schemes to be used towards the infrastructure asset out in the Strategic Sites Masterplanning and Infrastructure Study 2020 (or a version of this as amended).	Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/CA 1 The Strategy for Capel Parish	This policy should be read together with Policy X STRSS1 Land at Paddock Wood including east Capel and Policy STR/SS3 Tudeley Village The development strategy for Capel parish (excluding land which forms part of the Strategic Growth sites at Tudeley Village and Land east of Capel and Paddock Wood) is to: 1. Set Limits to Built Development for Five Oak Green Village on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Provide a new garden settlement at Tudeley Village, which will deliver approximately 2,800 dwellings and a range of associated services and infrastructure over the plan period and beyond (as set out in Policy STR/SS 3); 3. Accommodate approximately 2,060 dwellings on land at east Capel as part of the extension to Paddock Wood, and a range of associated services and infrastructure (as set out in Policy STR/SS 1);	There are no LSEs of this policy alone. This policy identifies a specific a quantum and the location of new homes (4,860), employment land and retail space. Potential impact pathways are	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and

	4. Providcompensatory improvements to the Green Belt, including measures to reduce flooding to particular areas of Five Oak Green; 5. Provide transport improvements, including online and offline improvements to the A228, potential provision of the safeguarded A228 Colts Hill bypass and a highway to bypass Five Oak Green; 6. Seek developer contributions, either in kind (normally land) and/ or financial, from residential schemes to be used towards the provision of: a. primary education facilities, namely the expansion of Capel Primary School by 1FE; b. open space, sports and recreations facilities, including improvements to the football pitches at Five Oak Green Recreation Ground.	present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/CRS 1: The Strategy for Cranbrook and Sissinghurst Parish	The development strategy for Cranbrook and Sissinghurst parish is to: 1. Set Limits to Built Development for Cranbrook and Sissinghurst, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Build approximately 339-359 new dwellings at Cranbrook (includes 180 new dwellings that have outline planning approval; Policy AL/CRS 2), and 35-40 at Sissinghurst, including affordable housing, as allocated under the subsequent site allocation policies; 3. Ensure that all development proposals establish an acceptable impact upon the Hawkhurst crossroads junction (A229/A268) and, if relevant, the Flimwell crossroads (junction of A21 and A268); 4. In relation to all development proposals for major development which would generate more than 100 Light Delivery Vehicles (cars and vans of less than 3.5 tonnes gross weight) or 25 Heavy Duty Vehicles (lorries, buses, etc over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through the northern arm of the cross-roads in Hawkhurst (i.e. approximately 250m to the north of the crossroads along the Cranbrook Road)) per day, be accompanied by an Air Quality Assessment, with the development providing appropriate mitigation measures;	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 339-359 new homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out

	5. Maintain and enhance linkages to, public rights of way or the local strategic cycle network, to include contributions towards the Bedgebury to Sissinghurst cycle path route; 6. Seek to retain land and buildings currently used for non-residential uses within the centres of Cranbrook and Sissinghurst for employment generating and community uses, and support proposals for such uses in suitable locations within the LBDs; 7. Retain the public car parks in Cranbrook, as defined on the Policies Map, in accordance with Policy TP4: Public Car Parks; 8. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. medical facilities that cover Cranbrook and Sissinghurst parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. primary education facilities, namely the expansion of the existing primary schools that serve Cranbrook and Sissinghurst parish; c. secondary education provision; d. provision of additional amenity/ natural greenspace, allotments, and improvements to childrens' and youth play space; improvements to the changing rooms and new pavilion at Cranbrook Rugby Club at Cranbrook; e. library provision, Adult Learning and Social Care, to include those services to be provided at the new Cranbrook Community Hub; f. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind. including potentially those identified in the Cranbrook & Sissinghurst Neighbourhood Plan.	Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.

Policy STR/HA 1: The Strategy for Hawkhurst Parish	The development strategy for Hawkhurst parish is to: 1. Set Limits to Built Development for Hawkhurst, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Build approximately 161-170 (net) new dwellings, including affordable housing, as allocated under the subsequent site allocation policies; 3. Ensure that all development proposals establish an acceptable impact upon the Hawkhurst crossroads junction (A229/A268) and the Flimwell crossroads (junction of A21 and A268); 4. Provide a comprehensive active travel strategy for the settlement of Hawkhurst, including to maintain and enhance, public rights of way and the local strategic cycle network, and linkages to them, to include contributions towards the proposed Bedgebury to Sissinghurst cycle path route; 5. In relation to all development proposals for major development which would generate more than 100 Light Delivery Vehicles (cars and vans of less than 3.5 tonnes gross weight) or 25 Heavy Duty Vehicles (lorries, buses, etc over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through the northern arm of the cross-roads in Hawkhurst (i.e. approximately 250m to the north of the crossroads along the Cranbrook Road)) per day, be accompanied by an Air Quality Assessment, with the development providing appropriate mitigation measures; 6. Retain the public car parks in Hawkhurst, as defined on the Policies Map, in accordance with Policy TP4: Public Car Parks, and to improve and increase provision of public parking to serve Hawkhurst, on sites near the settlement centre; 7. Safeguard the Gill's Green Key Employment Area, including its extension (as provided forby Policies AL/HA6 and 7), for future employment (B1/E, B2, B8) use in accordance with Policy ED 1; 8. Retain an appropriate mix of uses within the defined Primary Shopping Area, as defined on the Policies Map, in accordance with Policy ED 11; 9. Resist the loss of local shops, community facilities, and green spaces, in accordance with Policy ED12, and support the provision of any new retail development, community services, and open space, recreation	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes, employment land and retail space. A total of 161-170 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.

	facilities, etc. to meet local needs inaccordance with other policies within the Plan; 10. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. transport measures, particularly those related to active travel, to mitigate the impact on the crossroads at the centre of Hawkhurst (Highgate); b. medical facilities that cover Hawkhurst parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); c. the expansion of the existing primary school that serves Hawkhurst; d. youth and children's play space; e. improved/enhanced recreation/sports provision at King George V playing fields; f. a new community centre at Hawkhurst at the King George V playing fields; g. the proposed Cranbrook Community Hub, in relation to library, social care and adult education; h. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind, including potentially those identified or referenced in the Hawkhurst Neighbourhood Plan		
Policy PSTR/BE 1: The Strategy for Benenden Parish	The development strategy for Benenden parish is to: 1. Set Limits to Built Development for Benenden village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Build approximately 85-95 new dwellings, including affordable housing, as allocated under the subsequent site allocation policies; (note: Policy AL/BE3 land at Benenden Hospital (south) already has planning approval for 23 (net) dwellings; these are not included in the total allocations);	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes,	There are no LSEs of this policy 'in-combination' with other plans. The potential impact

	3. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. Medical facilities that cover Benenden parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. youth and children's play space; c. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind, including potentially those identified or referenced in the Benenden Neighbourhood Plan.	employment land and retail space. A total of 85-95 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/BI 1: The Strategy for Bidborough Parish	The development strategy for Bidborough parish is to: 1. Set Limits to Built Development for Bidborough village, as defined on the Policies Map (Inset Map X), as a framework for new development over the plan period; 2. Support active travel by delivering improvements to the local pedestrian and cycling network as set out in the Local Cycling and Walking Infrastructure Plan, including low traffic neighbourhoods and additional cycle parking in key locations. This will include through the provision of contributions; 3. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. new recreation/sports provision on land at and adjacent to Rusthall Recreation Ground (in Speldhurst	There are no LSEs. This policy does not identify a quantum and the location of new homes, employment land and retail space. Therefore, there	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered

	parish; see site allocation AL/SP2) to mitigate the impact from such development and/or new sports provision/facilities in Bidborough, which will cater for a range of ages; b. provision and enhancement of a range of play facilities at Bidborough play area, suitable for a range of ages, including youth provision; c. provision of additional allotments; d. secondary education provision; e. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	are no impact pathways present and this policy can thus be screened out.	significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/BM 1: The Strategy for Brenchley and Matfield Parish	The development strategy for Brenchley and Matfield parish is to: 1. Set Limits to Built Development for Brenchley village and Matfield village, as defined on the Policies Map (Inset Map X), as a framework for new development over the plan period; 2. Build approximately 41-60 new dwellings, including affordable housing, as allocated under the subsequent site allocation policies; 3. Retain the public car park in High Street, Brenchley, as defined on the Policies Map, in accordance with Policy TP 4: Public Car Parks; 4. Provide information boards (or similar) and installation of public art along the Hop Pickers Line. Other locally significant historical features, events, and personalities could be recognised as part of this approach. 5. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 41-60 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be

	be used towards the provision of: a. medical facilities that cover Brenchley and Matfield parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. improvements to changing rooms at the Brenchley War Memorial Ground, and/or potentially to new recreation/sports provision at Paddock Wood, as referred to in Policy XX; c. provision of a range of play facilities, including at Policy AL/BM1 Land between Brenchley Road, Coppers Lane and Maidstone Road and Policy AL/BM2 Land at Maidstone Road, suitable for a range of ages including child and youth provision; d. provision of amenity green space and additional allotments; e. secondary education provision; f. library provision; g. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/FR 1: The Strategy for Frittenden Parish	The development strategy for Frittenden parish is to: 1. Set Limits to Built Development for Frittenden village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period, incorporating the site allocation Policy AL/FR 1; 2. Deliver approximately 25-30 new dwellings (of which 40 per cent are to be affordable dwellings) on the site allocated Policy AL/FR1) in this Local Plan in the plan period; 3. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of:	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 25-30 homes is to be delivered in the 2020-2038	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered

	a. health and medical facilities that cover Frittenden parish (improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. primary and secondary education provision; c. improvements/enhancements to Frittenden Village Hall; d. youth play space; e. provision of additional allotments; f. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/GO 1: The Strategy for Goudhurst Parish	The development strategy for Goudhurst parish is to: 1. Set Limits to Built Development for Goudhurst village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Deliver approximately 26 (25 net) new dwellings (40 per cent affordable) as allocated under the subsequent site allocation policies; 3. Retain the Balcombes Hill public car park within Goudhurst, and as defined on the Policies Map, in accordance with Policy TP 4: Public Car Parks; 4. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. Medical facilities that cover Goudhurst parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities);	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 26 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can

	b. additional play space; c. improvements to allotments; d. community learning facilities; e. primary education facilities: f. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind, including potentially those identified or referenced in the Goudhurst Neighbourhood Plan.	present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/HO 1: The Strategy for Horsmonden Parish	The development strategy for Horsmonden parish is to: 1. Set Limits to Built Development for Horsmonden village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Deliver approximately 240-320 new dwellings, of which 40 per cent shall be affordable housing on three sites allocated in this Local Plan in the plan period (Policies AL/HO 1-3); 3. Provide information boards (or similar) and installation of public art along the Hop Pickers Line. Other locally significant historical features, events and personalities could be recognised as part of this approach; 4. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. medical facilities that cover Horsmonden parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. primary education facilities, namely the expansion of the existing primary school that serves	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 240-320 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'.

	Horsmonden parish; c. provision of additional allotments, amenity/natural green space and improvements to children's and youth play space; d. secondary education provision; e. provision of additional allotments, amenity/natural green space, and improvements to children's and youth play space; f. library provision; g. other necessary mitigation measures, which are directly related to the development and fairly and reasonably related in scale and kind.	• Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/LA 1: The Strategy for Lamberhurst Parish	The development strategy for Lamberhurst parish is to: 1. Set Limits to Built Development for Lamberhurst village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Build approximately 25-30 new dwellings (of which 40 percent shall be affordable housing) on land at Spray Hill allocated under the subsequent site allocation policy; 3. Retain the public car park at The Broadway, Lamberhurst, as defined on the Policies Map; 4. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. medical facilities that cover Lamberhurst parish (to be used towards improvements/reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. provision of additional allotments, amenity/natural green space and youth play space;	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 25-30 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out

	c. improvements to sports provision in Lamberhurst; d. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy STR/PE 1: The Strategy for Pembury Parish	The development strategy for Pembury parish is to: 1. Set Limits to Built Development for Pembury village as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period, incorporating the allocation of sites AL/PE 1-AL/PE 3 inclusive, AL/PE 5-AL/PE 7 inclusive, and AL/PE 4 in part into the Limits to Built Development; 2. Build approximately 389-417 new dwellings, of which 54 have existing planning permission*, of which 40 percent shall be affordable housing on Policies AL/PE1-AL/PE4 inclusive and 30 per cent shall be affordable on Policies AL/PE5 and AL/PE6**) as allocated under the subsequent site allocation policies; 3. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of: a. highway improvements and mitigation measures, including: i. speed reduction; ii. provision of a left hand turn from the A264 Pembury Road turning left into Tonbridge Road; iii. upgrade of signals at Woodsgate Corner crossroads; iv. relocation of pedestrian crossing point at Woodsgate Corner crossroads; v. improvement works to the access of the A21 roundabout, south bound exit; vi. provision of a left hand turn from Pembury High Street onto the A264 heading towards Tunbridge Wells at Woodsgate Corner crossroads; vii. Improvement work store-align lanes/pedestrian crossing point on the High Street side of Woodsgate Corner crossroads;	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 389-417 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching

	b. improvements and enhancement to cycle routes and cycle corridors; c. primary and secondary education provision; d. health and medical provision; e. improvements and enhancements to sports and recreation provision, including children's and youth play space; f. recreation and sports provision at Hawkenbury (site allocation Policy AL/RTW 19); g. allotments; h. community learning facilities; i. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	However, following the screening assessment a conclusion of no LSEs is reached.	development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/RU 1: The Strategy for Rusthall Parish	The development strategy for Rusthall parish is to: 1. Set Limits to Built Development for Rusthall village on the Policies Map (Inset Map X) as a framework for new development over the plan period; 2. Build approximately 15 new dwelling, (of which 30% are to be affordable dwellings), on one site, as allocated under Policy AL/RU 1; 3. Seek developer contributions from residential schemes, either in kind (normally land) and/or financial, to be used towards the provision of: a. additional recreation/sport provision on land at and adjacent to Rusthall Recreation Ground, as allocated under policy number AL/SP 2;	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 15 homes is to be delivered in the 2020-2038 Local Plan period.	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of

	b. highway improvement works, including speed reduction measures and signage; c. secondary education provision; d. children's play provision, including youth play provision; e. non-playing pitch facilities; f. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	individual parishes and this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/SA 1: The Strategy for Sandhurst Parish	The development strategy for Sandhurst parish is to: 1. Set Limits to Built Development for Sandhurst village, as defined on the Policies Map (Inset Map X) as a framework for new development over the plan period, incorporating the allocations AL/SA1 and AL/SA2 into the Sandhurst Limits to Built Development; 2. Build approximately, 20-30 new dwellings (including 40% affordable dwellings) on two sites at Sandhurst village, as allocated under policy numbers AL/SA1 and AL/SA2; 3. All development proposals for major development which would generate more than 100 Light Delivery Vehicles (cars and vans of less than 3.5 tonnes gross weight) or 25 Heavy Duty Vehicles (lorries, buses, etc over 3.5 tonnes gross weight) annual average daily traffic (AADT) movements through the northern arm of the cross-roads in Hawkhurst (i.e. approximately 250m to the north of the crossroads along the Cranbrook Road)) per day should be accompanied by an Air Quality Assessment, with the development providing appropriate mitigation measures; 4. Seek developer contributions, either in kind (normally land) and/or financial, from residential schemes to be used towards the provision of:	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes A total of 20-30 homes is to be delivered in the 2020-2038 Local Plan period. Potential impact pathways are present: • Recreational	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and this policy can thus be screened out

	a. health and medical facilities as appropriate that cover Sandhurst parish (to be used towards improvements/ reconfiguration of existing medical facilities or towards new premises providing medical facilities); b. youth play space; c. improvements to football pitches at Conghurst Lane Sports Ground (in neighbouring Hawkhurst parish), including improvements to drainage, and other recreation facilities; d. allotments; e. primary education provision; f. improvements to bus services including potential bus stops on the east side of the village; g. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Policy PSTR/SP 1: The Strategy for Speldhurst Parish	The development strategy for Speldhurst parish is to: 1. Set Limits to Built Development for the settlements of Speldhurst village and Langton Green, as defined on the Policies Map (Inset Map x) as a framework for new development over the plan period, incorporating the allocation AL/SP 1 into the Speldhurst Limits to Built Development; 2. Build approximately 10-12 new dwellings, (of which 40% are to be affordable dwellings), on one site at Speldhurst village, as allocated under Policy AL/SP 1; 3. Seek developer contributions from residential schemes, either in kind (normally land) and/or financial, to be used towards the provision of: a. new recreation/sports provision on land at and adjacent to Rusthall Recreation Ground (in Speldhurst parish, allocated under Policy AL/SP 2);	There are no LSEs of this policy alone. This policy identifies a quantum and the location of new homes. A total of 10-12 homes is to be delivered in the 2020-2038 Local Plan period.	There are no LSEs of this policy 'in-combination' with other plans. The potential impact pathways that are present are not considered significant at the level of individual parishes and

	b. secondary education provision; c. youth play space; d. allotments; e. other necessary mitigation measures which are directly related to the development and fairly and reasonably related in scale and kind.	Potential impact pathways are present: • Recreational Pressure / Urbanisation • Atmospheric Pollution However, following the screening assessment a conclusion of no LSEs is reached.	this policy can thus be screened out 'in-combination'. However, the overarching development (STR 1) and economic (ED 1) policies have been screened in.
Section 6: Development Management Policies			
Policy EN 1: Sustainable Design	**Sustainable Design** All proposals for development within the borough will be required to satisfy the following criteria, as applicable to the type of development proposed, and consideration of the criteria should be demonstrated in supporting statements submitted with an application. It is expected that any departure from this policy, including its individual criterion, must be robustly justified in information submitted in support of the application. For development proposals of over 20 units or 2,000sqm floorspace new build or conversion, a Construction Environmental Management Plan that provides details on all applicable topics above will be required at pre-commencement stage. These will include targets for diversion of waste from landfill and responsible procurement. The criteria below are relevant to the design, construction, and operation of the proposal and must be considered from the beginning of the design process. They should also not be read as an exhaustive list, but as an indicative guide to the main issues that need to be considered and addressed when submitting proposals for development. Additionally, the 'Planning Advice Note for Applicants/Agents: Information required when submitting a	There are no LSEs of this policy alone. This policy outlines criteria for sustainable design and construction. It includes the positive element of preserving and enhancing biodiversity. The policy neither provides the quantum or location of new development.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Planning Application', which is available on the Council's website*, provides information and guidance about the type of information that should be submitted to support planning application proposals. **Design, character, and site context** 1. Proposals should retain and, where appropriate, enhance buildings that contribute positively to the locality and street scene, heritage assets, open spaces, trees/vegetation, features of biodiversity/geodiversity, or other features important to the built or landscape character of the area, especially in the High Weald Area of Outstanding Natural Beauty, unless the proposed development is demonstrably improved overall; 2. Proposals should make efficient use of land and buildings, including through the reuse of buildings where practicable; 3. Siting, layout, density, spacing, orientation, and landscaping must respect site characteristics; including its topography, natural features, relationship with immediate surroundings, historic setting, and views into and out of the site; 4. The scale, form, height, massing, proportions, external appearance, and materials should be compatible with existing buildings, building lines, landscape, treescape, roofscapes, and skylines. 5. Where possible, materials should be used that are sustainably sourced by local suppliers and with low embodied carbon such as recycled or secondary aggregates and can be easily reused or recycled at the end of their life; 6. The design and layout shall be accessible to all, and maintain and maximise opportunities for permeability and linkages to the surrounding area, existing public rights of way, local services, and access to amenity open space, including through public transport and opportunities for active travel such as walking and cycling; 7. Buildings should be designed to be adaptable to the changing needs of occupiers over their lifetime, with residential development, where appropriate, making suitable provision for home working; 8. Proposals should be designed for significant carbon dioxide emissions reductions and more sustainable energy sources, through energy efficiency improvements and facilitating low and zero carbon technology	Therefore, there are no impact pathways present and this policy can thus be screened out.	

	to ensure development supports a path to net zero emissions by 2030; 9. Proposals should include infrastructure that meets modern communication and technology needs, and restricts the need for future retrofitting-including broadband, fibre to the premises (FTTP) where possible, high speed internet cabling/ducting, and provision of a power supply and infrastructure that would support green technology initiatives, such as electric vehicle charging points; 10. Proposals should incorporate measures for the adequate storage of waste,including recyclable waste, and domestic paraphernalia; 11. Proposals should follow the waste hierarchy during construction, by first minimising the generation of waste and then maximising re-use or recycling of waste. For all development, sending waste to landfill must be a last resort; 12. Proposals should encourage positive behavior change, such as provision of drinking fountains in public realm developments to discourage purchase of single use plastic. (See also Policies EN2: Sustainable Design Standards, EN3: Climate Change Mitigation and Adaptation, EN 4: Historic Environment, EN 5: Heritage Assets, EN 9: Biodiversity Net Gain, EN 10: Protection of Designated Sites and Habitats, EN 11: Ashdown Forest Special Protection Area and Special Area of Conservation, EN 12: Trees, Woodlands, Hedges, and Development, EN 16-19: Landscape policies, EN 24-26: Water related policies, ED 3: Digital Communications and Fibre to the Premises (FTTP) and TP 2: Transport Design and Accessibility). **Highway safety and access** 1. Vehicular access, parking provision, and pedestrian movement should be safely accommodated; 2. Traffic from new development should not result in severe residual cumulative impacts on the road network; 3. The proposal should include cycle storage/parking and infrastructure provision in accordance with Policy TP3: Parking Standards;		

	4. Car parking and/or servicing should be appropriate to site context and designed and located so as not to cause material harm to the visual amenity and not dominate the street scene and/or public realm. (See also Policies TP2: Transport Design and Accessibility and TP3: Parking Standards). **Water/flooding issues** 1. Proposals should use water efficiently; in the case of new homes by meeting the tighter Building Regulations optional requirement, and incorporating facilities to recycle, harvest, and conserve water resources wherever practicable; 2. Proposals should ensure there is adequate drainage provision so that surface water is appropriately controlled within the development site by using Sustainable Drainage Systems (SuDS), flood risk is managed on-site and off-site, and any existing flood risk in the locality is not exacerbated; 3. Proposals should avoid inappropriate (link to flood risk document) new development within areas at risk from flooding or mitigate any potential impacts of new development within such areas whereby mitigation measures are integral to the design of buildings. (See also Policies EN 24: Water Supply, Quality and Conservation, EN 25: Flood Risk and EN 26: Sustainable Drainage). **Landscape, trees, and amenity** 1. Proposals should be accompanied by an integral landscaping (both hard and soft) scheme, which contributes to, and enhances, the natural and local environment, including sympathetic boundary treatments and green infrastructure; 2. Any proposed new landscaping, and any existing landscape feature to be retained, shall include adequate provision for future tree and hedgerow growth, and management practices. (See also Policies EN 12: Trees, Woodlands, Hedges, and Development and EN 13: Ancient Woodland and Veteran Trees). **Biodiversity and geodiversity**		

	1. Proposals should maximise opportunities for increasing biodiversity potential, and retaining and enhancing blue/green infrastructure features, including SuDS; 2. Proposals that affect existing biodiversity, geodiversity, and blue/green infrastructure must be designed to avoid, mitigate, or compensate for any potential harm, resulting in a net gain; 3. Proposals should identify and not undermine the value of ecosystem services that the site provides. (See also Policies EN 9: Biodiversity Net Gain, EN 10: Protection of Designated Sites and Habitats and EN 11: Ashdown Forest Special Protection Area and Special Area of Conservation, and EN 26: Sustainable Drainage). **Residential amenity** Proposals should not cause significant harm to the amenities of occupiers of neighbouring properties and uses, and should provide adequate residential amenities for future occupiers of the development by ensuring: 1. That development does not result in, or is exposed to, excessive noise, vibration, odour, air pollution, activity, vehicular movements, or overlooking; 2. That the built form does not create an unacceptable loss of privacy and overbearing impact, outlook, or daylight and sunlight enjoyed by the occupiers of adjacent/nearby properties; 3. Provision of sufficient public and private outdoor and recreational space. (See also Policies EN 27: Noise, H 11: Residential extensions, alterations, outbuildings, and annexes and OSSR 2: The Provision of Publicly Accessible Open Space and Recreation). **Crime reduction** Proposals should create a safe and secure environment and incorporate adequate security measures and features to deter crime, fear of crime, disorder, and anti-social behaviour. **Design and construction guidance** Account must be taken of the guidance documents (and any successive guidance) listed above in paragraph		

<table>
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<td>6.23, where relevant, including Supplementary Planning Documents, the Kent Design Guide, Building for a Healthy Life, the National Design Guide, Conservation Area Appraisals, the High Weald AONB Management Plan, the High Weald AONB Housing Design Guide, and related supporting guidance. Registration with the Considerate Constructors Scheme (or equivalent) is strongly encouraged.

Community engagement

New development should be informed by effective engagement between applicants, local communities, neighbours of sites, local planning authorities, infrastructure providers and other interests throughout the planning process. Applications that demonstrate early, proactive, and effective engagement, and that the views expressed in that engagement have been properly considered, will be looked on more favourably than those that cannot.</td>
<td></td>
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<tr>
<td>Policy EN 2: Sustainable Design Standards</td>
<td>The following minimum design standards must be achieved for all major non-residential developments in the time frames shown. For residential developments, achieving the following minimum design standards will be strongly encouraged until national policy allows otherwise.
<table>
<tr><th>Residential or non-residential development</th><th>Number of dwellings</th><th>Year 2022-2025</th><th>Year 2026 onwards</th></tr>
<tr><td>Residential</td><td>10-150 dwellings</td><td>HQM *
3 Stars</td><td>HQM *
4 Stars</td></tr>
<tr><td>Residential</td><td>>150 dwellings</td><td>HQM *
4 Stars</td><td>HQM *
4 Stars</td></tr>
<tr><td>Non - residential</td><td>1,000-5,000m^2</td><td>BREEAM *
Very good</td><td>BREEAM *
Excellent</td></tr>
<tr><td>Non - residential</td><td>>5,000m^2</td><td>BREEAM *
Excellent</td><td>BREEAM *
Excellent</td></tr>
</table>
* Where HQM is the 'Home Quality Mark' and BREEAM is the 'Building Research Establishment Environmental Assessment Method'.</td>
<td>There are no LSEs of this policy alone.

This policy details sustainable design standards. The policy neither provides the quantum or location of new development.

Therefore, there are no impact pathways present and this policy can thus be screened out.</td>
<td>There are no LSEs of this policy ‘in-combination’ with other plans.

There are no impact pathways present and this policy can thus be screened out ‘in-combination’.</td>
</tr>
</table>

	Where applicable, work must begin to obtain the required design standard at an early stage in the design process so that benefits can be maximised, and this intention should be demonstrated in a Design and Access Statement. Unless agreed otherwise, compliance with this policy should be demonstrated via the following certificates (or future equivalent): 1. 'Pre-assessment estimator' at application stage; 2. 'Interim design' (HQM) or 'design stage' certificates prior to construction; 3. Final certificates for all schemes six months post completion. Developers implementing an alternative standard should submit equivalent certificates for each of these stages.		
Policy EN 3 Climate Change Mitigation and Adaptation	Subject to all other material considerations, proposals for zero carbon and low emission development, as well as development that allow communities, infrastructure, businesses, and the natural environment to adapt to the impacts of climate change, will be strongly supported. **Energy reduction in new buildings** Proposals for the construction of new buildings are required to incorporate design features that help deliver radical reductions in greenhouse gas emissions, particularly CO2 emissions, and thus help mitigate climate change impacts. This will be achieved using the measures set out below, unless superseded by national policy or legislation: 1. A 'fabric first' approach in which all development comprising the construction of new buildings is required to reduce operational CO2 emissions by at least 10% below the Target Emission Rate (TER) as set out in Building Regulations Part L (2013); 2. Requirement for major development comprising the construction of new buildings to reduce operational CO2 emissions by 15% using renewable energy generating technology, to be installed on site. The 15% reduction will be calculated only after the 'fabric first' approach has been applied. The 'fabric first' approach should be based upon a consideration of U-values, thermal bridging, air permeability, and thermal mass, and also features that affect lighting and solar gains, such as building	There are no LSEs of this policy alone. This policy details the Council's climate change adaptation approach. The policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	orientation and layout. Renewable energy generating technology includes photo voltaics, solar hot water, air/ground source heat pumps, wind turbines, hydropower, and biomass boilers*. Low carbon technology presented as an alternative to renewable energy generating technology, such as Combined Heat and Power (CHP), will be considered on a case-by-case basis, as will emerging new technology.The choice of technology to be installed will have consideration for site constraints such as shading, local air quality, and sensitive features such as the landscape and historic environment. All energy calculations should be made using recognized calculators such as the Standard Assessment Procedure (SAP) or Home Quality Mark method for residential buildings, or the Simplified Building Energy Model (SBEM) for non-residential buildings. The calculations should include all regulated emissions such as fixed heating, lighting, hot water, and ventilation. Unregulated emissions from appliances such as white goods should be considered wherever possible. Compliance with this policy should be demonstrated with a design stage Energy Strategy Report (major development) or Energy Statement (minor development), which is revisited during the construction phase to confirm its predictions are still valid and thus help avoid a 'performance gap'. Both submissions should contain adequate information to demonstrate how the energy hierarchy has been followed and energy reduction targets will be achieved. The level of detail provided should be proportionate to the size of the development. There may be exceptional circumstances where compliance with this policy would make the development not viable. In each case these circumstances would need to be fully demonstrated to warrant a departure from compliance with this policy. *using locally sourced fuel and outside of urban areas only. See Policy EN23-Biomass Technology. **Climate Change Adaptation** Where relevant, development must incorporate measures that adapt to the impacts of climate change. These could include, but are not limited to, the following measures: 1. Protection, and provision, of well connected, green infrastructure (especially trees) that facilitates native		

	species' movements, facilitates sustainable drainage, provides natural shading, and is well adapted to summer drought and increased winter rainfall (refer to Policy EN 14: Green, Grey, and Blue Infrastructure); 2. Reduction in flood risk and provision of infrastructure to protect vulnerable communities and habitats, and minimization of water consumption. Refer to Policies EN24: Water Supply, Quality and Conservation, EN 25: Flood Risk, and EN 26: Sustainable Drainage; 3. Reduction in the urban heat island effect by consideration of road and building surface materials and the role of green infrastructure; 4. Support for proposals and associated infrastructure that allow for more resilient forestry and agricultural practices; 5. Buildings designed and built to avoid overheating, especially those for vulnerable users such as hospitals, schools, and elderly care homes, by following the cooling hierarchy. The latest strategy published by the National Adaptation Programme should be referred to for advice and Dynamic Thermal Modelling should be used where applicable.		
Policy EN 4: Historic Environment	Proposals for development will be required to reflect the local distinctiveness, condition (state of repair), and sensitivity to change of the historic environment as defined in the guidance listed above in paragraph 6.55. All new development shall contribute to the overall conservation and, where possible, enhancement, of the historic environment of the borough. Applicants must demonstrate how their proposals have regard to the advice set out in government historic environment policy and guidance, including Historic England Good Practice Advice Notes and Historic England Advice Notes, and the themes in the Historic Environment Review. All proposals shall demonstrate: 1. How the development proposal would preserve or enhance the historic environment;	There are no LSEs of this policy alone. This policy relates to the provision of development in line with the historic character of TWB. It neither provides the quantum or	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be

	2. A clear consideration of the relationship of the proposal with the historic evolution of the borough; 3. An assessment of the historic character of the local area; 4. An understanding of heritage assets and their setting and associated significance, vulnerabilities, and opportunities.	location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	screened out 'in-combination'.
Policy EN 5: Heritage Assets	Proposals that affect a designated or non-designated heritage asset, or its setting, will normallyonlybepermittedwherethedevelopmentconservesorenhancesthecharacter, appearance, amenity, and setting of the asset, and in the case of historic parks and gardens, provides, where possible, improvement of access to it. Designated heritage assets are the subject of separate legislative planning requirements, as set out in the above supporting text for each heritage asset type, and proposals shall specifically have regard to these. Proposals that will assist in bringing a heritage asset at risk back into a use consistent with its conservation will be encouraged. Applications will be assessed with reference to the following: 1. the historic and/or architectural significance of the asset; 2. the prominence of its location and setting; 3. the historic and/or architectural significance of any elements to be lost or replaced. Proposals should also comply with the advice set out in the Conserving and Enhancing the Historic Environment Section of the NPPF (and any subsequent versions). Any development that might directly or indirectly affect the significance of a listed building, conservation area,	There are no LSEs of this policy alone. This policy relates to heritage assets present in TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	historic park and garden, scheduled ancient monument, historic landscape (including ancient woodland and veteran trees), archaeological site, or local heritage asset, will be required to submit a heritage statement, and/or where applicable, an archaeological assessment and/or management plan as above for historic parks and gardens, with any planning application, which can be included within a design and access statement. This includes development affecting their setting. The assessment of proposals should make reference to the Tunbridge Wells Borough Historic Environment Review, the Council's List of Local Heritage Assets, which includes buildings and historic parks and gardens of local importance, and relevant guidance. Although the Council does not hold an exhaustive list of non-designated heritage assets, it should be noted that these are often identified at the application stage of any proposal. Should permission be granted for the removal of part or all of a heritage asset, the Local Planning Authority will not permit the removal or demolition of the heritage asset until it is proven that the approved replacement development will proceed.		
Policy EN 6: Shop Fronts	Shop fronts that are of historic interest and architectural merit should be retained and those that have been lost should be reinstated. Proposals for new shopfronts, or alterations to existing shop fronts, will only be permitted where all of the following criteria are satisfied: 1. The shop front is correctly proportioned in relation to the width of the property (or a logical vertical sub-division created by the upper storey), in sympathy with the architectural style, materials, and form of the building(s) of which it would form part, except in cases where the building itself is architecturally incompatible with the character of the area. Where a single unit of occupation has been formed by amalgamating shop units, shop front design should relate to the original unit widths; 2. The shop front is in sympathy with the predominant architectural style and materials of neighbouring properties and the surrounding area; 3. Any blinds and security measures (where demonstrated to be necessary) shall be designed and sited to be unobtrusive and shall not harm the character and appearance of the building nor the street frontage; 4. Where a fascia is to be applied, it will be of an appropriate height, in scale with the overall height of the shop front and other elements of the building, and not intrude over the first floor level;	There are no LSEs of this policy alone. This policy details the character of shop fronts within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	5. Where illumination is required, it should be restrained and unobtrusively sited within the context of the appearance of the building and its setting, in accordance with the advice set out in the Professional Institute of Lighting Engineers Guidance Note 1 relating to The Reduction of Obtrusive Light or any successive guidance; 6. In conservation areas and premises fronting Camden Road, St John's Road, and Silverdale Road, Royal Tunbridge Wells, and London Road, Southborough, as defined on the Policies Map, the proposal will not result in the loss of a traditional shopfront, or features and details of architectural or historic interest.		
Policy EN 7: Advertisements	All advertisements will be required to satisfy all of the following criteria: 1. No advertisement should be obtrusive in appearance, appear dominant or overbearing in the street scene or landscape, cause visual clutter or result in a proliferation of signs, or cause significant harm to the appearance of any building or site on which it would be displayed because of its size, design, construction, or materials; 2. Where illumination is required, lighting sources should be unobtrusively sited, within the context of the appearance of the building and its setting, and the level of illumination should not cause significant harm to visual and residential amenity, having regard to the standards set out in the Institute of Lighting Professionals Guidance Note GN01: the Reduction of Obtrusive Light (or any successive guidance); 3. Any illumination should only be in use during business opening hours; 4. No advertisement should be so distracting or confusing that it would endanger highway or public safety; 5. In conservation areas, on listed buildings and non-designated heritage assets, the advertisement and any form of illumination should be designed, constructed, and sited so as to preserve or enhance the special character and appearance of the building and/or conservation area; 6. The advertisement should be compatible with conserving and enhancing the landscape and scenic beauty of the High Weald Area of Outstanding Natural Beauty.	There are no LSEs of this policy alone. This policy details the nature of advertisement within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 8: Outdoor Lighting and Dark Skies	In rural areas outside the Limits to Built Development there will be a presumption against outdoor lighting except where it is for a reasonable level of safety or security, or exceptional circumstances exist. Under such exceptional circumstances, and within the Limits to Built Development, lighting of outdoor areas will only be	There are no LSEs of this policy alone.	There are no LSEs of this policy 'in-

	permitted where all of the following criteria are met: 1. The level of lighting is the minimum amount necessary to achieve the purpose for which it is provided or otherwise justified on safety or security grounds and, in respect of the provision of any new street lighting, is agreed where possible with the local parish or town council; 2. The design and specification of lighting would minimise obtrusive light, in accordance with the Institute of Lighting Professionals Guidance Note GN01: the Reduction of Obtrusive Light (or any subsequent guidance) treating all rural areas as "intrinsically dark with natural surroundings"; 3. There are effective controls to reduce the extent of light spillage, such as through use of low-level lighting, motion sensors or other automated switching and dimming, and use of backscatter guards; 4. The means of lighting would not cause an unacceptable level of impact on wildlife, local heritage assets, or the wider landscape; 5. Low energy LED lighting would be used; 6. Where floodlighting of a landmark feature is proposed, the level and type of illumination would enhance the feature itself and be designed so as not to cause a nuisance.	This policy details the plan for outdoor lighting within TWB, aiming at the minimization of obtrusive light sources. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 9: Biodiversity Net Gain	Development will only be permitted where it meets all of the following criteria: 1. It can be demonstrated through the application of the Defra Biodiversity Metric (and any subsequent replacements), as part of a Biodiversity Gain Plan, that completion of the development will result in a measurable long-term net gain for biodiversity in both area and linear habitats, as follows: a. Net gain shall be provided on or adjacent to the site wherever possible and where provided offsite shall in terms of location and type be in accordance with the supporting text or as otherwise required by Supplementary Planning Guidance; b. The percentage of net gain shall be a minimum of 10% as required by legislation or greater where required by Supplementary Planning Guidance; c. The Biodiversity Gain Plan will include, as a minimum, the information set out in the supporting text or	There are no LSEs of this policy alone. This is a positive policy outlining that all development must satisfy strict criteria, including biodiversity net gain and appropriate mitigation	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out

	as otherwise required by supplementary planning guidance; 2. It can be demonstrated that the proposals have adopted a strict approach to the mitigation hierarchy (i.e. avoid, mitigate, compensate) and are able to justify all unavoidable impacts on biodiversity; 3. The proposed mitigation, compensation, and/or enhancement measures required to secure net gain for biodiversity are acceptable to the Council in terms of design and location, and are secured, on site, for the lifetime of the development, or off site for a minimum of 30 years, with appropriate funding mechanisms that are capable of being secured by condition and/or legal agreement. Funding for both on-site and off-site measures shall include a payment to the Council to cover the costs of independent review of Biodiversity Gain Plans and long-term monitoring.	measures. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	'in-combination'.
Policy EN 10: Protection of Designated sites and habitats	The positive management of designated sites and habitats is encouraged and promoted, as is their conservation and enhancement in accordance with their hierarchical status. Development proposals that would have a direct or indirect adverse effect on the nature conservation or geological interest of a designated site of national, regional, or local importance will not normally be permitted. Exceptions to this will only be permitted if all of the following criteria are satisfied: 1. The need for the development would clearly outweigh the affected nature conservation interest of the site; 2. There would be no reasonable, less damaging, alternative solutions, locations, or sites; 3. The design and layout of the scheme would minimize the potential impact on notable habitats, species, and any public enjoyment or access to the site; 4. That compensation, including management and monitoring, is provided in accordance with Policy EN 9: Biodiversity Net Gain; 5. In the case of designated geological sites: a. The geological interest of the site, and access to it, is not compromised; b. Where possible, access and/or interpretation is improved.	There are no LSEs of this policy alone. This is a positive policy outlining that all development must satisfy strict criteria. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 11:	All development that results in a net increase in housing within the 7km defined zone of influence*, as set out	There are no	There are no

Ashdown Forest Special Protection Area and Special Area of Conservation	in the Council's Ashdown Forest Practice Note (2018), will provide a Strategic Access Management and Monitoring (SAMMs) and a Suitable Alternative Natural Greenspaces (SANGs) contribution to address the impact of visitors from new development on Ashdown Forest. Contributions will be sought in accordance with the prevailing SAMMs and SANGs Strategy adopted by the Local Planning Authority and in force at the time of the application. Alternative provision(s) for mitigation to address the impact of visitors will only be considered where it can be demonstrated that it will be effective and deliverable over the lifetime of the development. Proposals for major development within, or adjacent to, the zone of influence will be considered on a case-by-case basis in accordance with the requirements of the Habitats Directive to determine what, if any, mitigation is required, including SAMMs and SANGs. For further guidance please refer to the Practice Note for Ashdown Forest that accompanies the Habitats Regulations Assessment. *The zone may be subject to revision to take account of new evidence on visitor patterns or monitoring. Any changes will take place through a supplementary planning document.	LSEs of this policy alone. This is a positive policy extending specific importance to the protection of Ashdown Forest SPA / SAC, including the contribution of TWB to a SAMMs strategy for housing within 7km. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 12: Trees, Woodlands, Hedges, and Development	Planning permission will not normally be permitted where the proposal adversely affects important trees, woodlands, and hedgerows, especially those that are: 1. Protected by a Tree Preservation Order (TPO); and/or 2. In a conservation area; and/or 3. Ancient woodlands or ancient and veteran trees; and/or 4. In historic parks and gardens; and/or 5. Within a recognised Nature Conservation Site; and/or	There are no LSEs of this policy alone. This is a positive policy extending protected status to important	There are no LSEs of this policy 'in-combination' with other plans. There are no

	6. In a recognised Area of Landscape Importance; and/or 7. Important landscape or townscape trees; and/or 8. An important contribution to green infrastructure or other important ecological networks. Developments will generally be expected to increase tree cover, especially in urban areas, and there will be a presumption in favour of the retention and enhancement of existing trees, woodland, and hedgerow cover on site, unless: a. The removal of any trees would be in the interests of good arboricultural practice; or b. The need and/or public benefit of the proposed development outweighs the amenity value of any trees or hedges removed. Where there is an unavoidable loss of trees on site, however, an appropriate number of suitable replacement trees (in terms of species and size) that replaces or exceeds that which is lost will be required to be planted on site. In exceptional circumstances; for example, where there is no appropriate space for planting on site, or the site is a constrained site within an urban setting, planting of suitable replacements (in terms of species and size) off site will be sought by way of appropriate funding mechanisms that are capable of being secured by condition and/or legal agreement. This does not necessarily replace the requirements of other policies with regard to net gain for biodiversity or green infrastructure, but may contribute to those objectives. Appropriate management measures will be required to be implemented to protect newly planted and existing trees, woodlands, and/or hedgerows. Advice note: Where trees on, or adjacent to, the site are likely to be affected by development, tree survey information in accordance with the current recommendations of BS 5837: Trees in Relation to Design, Demolition and Construction (or subsequent revision) should be submitted with planning applications as appropriate. The tree survey information should include protection, mitigation, and management measures, including arboricultural site supervision where required.	trees, woodlands and hedges. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 13: Ancient Woodland and veteran Trees	Loss or deterioration of irreplaceable habitats, including ancient woodland and aged or veteran trees found outside ancient woodland, resulting from development proposals shall not be allowed unless there are wholly exceptional reasons, as defined by the NPPF, and in such circumstances appropriate compensatory measures are provided. Where ancient wood pasture* and historic parkland are identified, they shall receive the same consideration	There are no LSEs of this policy alone. This is a positive policy extending	There are no LSEs of this policy 'in-combination' with other plans.

	as other forms of ancient woodland. Where development proposals may affect ancient woodlands, including translocated woodlands (translocated ancient woodlands will be treated the same as if they are ancient woodland),veteran rees, and their immediate surroundings, the following principles shall be used to guide both site selection and the design of development: 1. Avoidance of harm; 2. Provision of unequivocal evidence of need and benefits of the proposed development, and for the design of development: 3. Establishment of the likelihood and type of any impacts; 4. Implementation of appropriate and adequate mitigation, compensation, and management measures that respect the features and characteristics of the veteran trees and/or ancient woodland; 5. Provision of adequate buffers; 6. Provision of adequate evidence to support development proposals. *Ancient wood pastures are areas of grazed pasture, heath, or open hill with a scattering of open-grown veteran trees.	protected status to ancient woodland and veteran trees. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 14: Green, Grey and Blue Infrastructure	Development proposals will be expected to identify and protect existing green, grey, and blue infrastructure and maximise opportunities for new infrastructure that supports climate change adaptation and ecosystem services, and makes a positive contribution to strengthening and restoring a healthy and integrated network of habitats and green spaces for the benefit of nature, people, and the economy. Green, grey, and blue infrastructure may be a multi-functional feature, which includes the provision of improved connections for people, or stepping stones/corridors for wildlife. Proposals for new green, grey, and blue infrastructure should aim to improve connectivity and be informed by, and respond to: 1. Biodiversity opportunity areas statements; 2. County and borough green infrastructure plans and mapping; 3. Ecological surveys and identified priority habitats; 4. Kent Nature Partnership Biodiversity Action Plan; 5. Landscape character assessments; 6. River basin management plans. Opportunities for green (and grey and blue) infrastructure should have regard to other relevant policies for landscape, heritage, biodiversity, and trees and include, but are not limited to: a. Landscape buffers; and/or b. Green routes for walking, cycling, and horse riding; and/or	There are no LSEs of this policy alone. . This is a positive policy extending the responsibility to new development proposals to protect biodiversity and ecosystem services. It neither provides the quantum or location of new development.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	c. Swales and attenuation ponds as part of Sustainable Drainage Systems (SuDS); and/or d. Woodland creation; and/or e. Reinstatement of historic field patterns and hedgerows; and/or f. Restoration of important habitats and landscape features, such as gill streams, ponds, meadows, and heaths; and/or g. Creation of ponds and wetlands for wildlife. Even in urban areas where there is little existing green and blue infrastructure, all developments are expected to maximise opportunities for green and blue infrastructure and biodiversity enhancements, with a particular emphasis on water management, atmospheric pollution, and urban wildlife, and can include, but are not limited to, the following measures: i. Green/brown roofs and green walls; and/or ii. Rain gardens; and/or iii. Street tree and hedge planting; and/or iv. The addition of bird and bat boxes for urban species as indicated in Policy EN 9: Biodiversity Net Gai	Therefore, there are no impact pathways present and this policy can thus be screened out.	
Policy EN 15: Local Green Space	A Local Green Space is a designated area of green or open space that is demonstrably special to the local community that it serves. Development on these areas will not be permitted unless one of the following criteria is met: 1. The proposed development constitutes very special circumstances (such as essential utility infrastructure) that justify the need for development and it can be demonstrated that the need cannot reasonably be met outside the designated area or in some other less harmful way. Where this is the case, the public benefits of the development must demonstrably outweigh the harm caused to the designated area of Local Green Space; 2. The proposed development would incorporate and preserve the main features, use, and purpose of the designated area of Local Green Space on the same development site, including, where already in existence, continued community access to the area. The proposals may involve plans to expand the existing Local Green Space and/or improve its existing use and purpose, such as new recreational facilities; 3. The proposed development does not materially reduce the community use, detract from the function, or affect the appreciation of the designated area of Local Green Space. There will be acceptable provision to offset any loss of, or detriment to, the area of Local Green Space on, or close to, the site.	There are no LSEs of this policy alone. This is a positive policy aiming at the preservation of local green spaces. This is important because the accessibility of such local space will reduce the likelihood of people visiting the Ashdown Forest SPA / SAC, and as	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	For a full schedule of the designated Local Green Space sites in Tunbridge Wellsborough, see Appendix 2. All sites are also defined on the Policies Map.	such could contribute to reducing recreational disturbance. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	
Policy EN 16: Landscape within the built environment	Proposals for development affecting Areas of Important Open Space, Areas of Landscape Importance, or the Important Landscape Approaches to settlements, as defined on the Policies Map, will only be permitted in limited circumstances where no significant harm would be caused to the appearance and character of the area or approach, and the development would not materially detract from the contribution that area or approach makes to the locality. Where it is considered possible, the Local Planning Authority will ensure that the area is conserved and enhanced as part of the proposal. The effects of proposals on areas of landscape interest that are not covered by the above designations will be assessed in accordance with other relevant policies, including: Policies EN1: Sustainable Design, EN9: Biodiversity Net Gain, EN12 Trees, Woodlands, Hedges, and Development and EN 14 Green, Grey and Blue Infrastructure.	There are no LSEs of this policy alone. This is a positive policy aiming at the protection of Important Open Space. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

		policy can thus be screened out.	
Policy EN 17: Arcadian Areas	Proposals for development that would affect the character or appearance of an Arcadian Area, as defined on the Policies Map, will only be permitted if all of the following criteria are satisfied: 1. The proposal would result in a low density of development where building heights, site coverage, distance from site boundaries, and front and rear building lines respect the predominant characteristics of the area; 2. Existing and proposed landscaping, including adequate capacity for future plant growth, would dominate within the site and along boundaries; 3. Access widths would be narrow; 4. Buildings and parking would be well concealed in views from public places.	There are no LSEs of this policy alone. This policy details the protection of Arcadian Areas within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 18: Rural Landscape	Development will be required to: 1. Conserve and enhance the unique and diverse variety and juxtaposition of the borough's landscape and the special features that contribute positively to the local sense of place; 2. Include appropriate mitigation to ensure against significant harm to the landscape setting of settlements, including historic farmsteads and hamlets; 3. Not result in unsympathetic change to the character of a rural lane, which is of landscape, amenity, nature conservation, or historic or archaeological importance; 4. Restore landscape character where it has been eroded; 5. Preserve intrinsically dark landscapes in accordance with Policy EN 8: Outdoor Lighting and Dark Skies.	There are no LSEs of this policy alone. This policy details the protection of TWB's rural landscape. It neither provides the quantum or location of new	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be

		development. Therefore, there are no impact pathways present and this policy can thus be screened out.	screened out 'in-combination'.
Policy EN 19: The High Weald Area of Outstanding Natural Beauty (AONB)	All development within, or affecting the setting of, the High Weald Area of Outstanding Natural Beauty (AONB) shall seek to conserve and enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan. Development in the AONB should be limited in scale and extent, appropriate in terms of its nature and location, and should demonstrate a positive contribution to the objectives of the AONB Management Plan. It will need to: 1. Be sensitive to the topography and landscape features of the location; 2. Improve where possible connections between settlements and countryside through the provision of high quality green infrastructure (see Policy EN14: Green, Grey, and Blue Infrastructure); 3. Where present, protect, enhance, and restore key characteristics of historic route ways; 4. Retain and support the distinctiveness of individual settlements and their key characteristics; 5. Help restore the natural functioning of water courses; 6. Improve the management of associated agricultural land, woodland, and heaths; ; 7. Where possible and appropriate, improve public access to the countryside providing waymarking and interpretation material to assist in the public enjoyment, appreciation, and understanding of the AONB. Planning permission will be refused for 'major' development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest, in accordance with national policy.	There are no LSEs of this policy alone. This is a positive policy aimed at preserving the scenery and landscapes of the High Weald AONB. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 20: Agricultural	The Local Planning Authority seeks to protect best and most versatile agricultural land from significant, inappropriate, or unsustainable development. Where development of agricultural land is required, applicants	There are no LSEs of this	There are no LSEs of this

Land	should seek to use areas of poorer quality agricultural land in preference to that of higher quality, except where this would be inconsistent with other sustainability objectives. Planning applications that would result in the loss of best and most versatile agricultural land will need to justify why the loss of the agricultural land is acceptable and also assess the impact of the loss of the agricultural land on the wider farming resource, natural capital, and ecosystem services. Where site-specific ALC studies are not available, the Local Planning Authority will assume that the site is classified as best and most versatile.	policy alone. This is a policy outlining the protection of agricultural land from development. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 21: Air Quality	Development will not be permitted when it is considered that the health, amenity, or natural environment of the surrounding area would be subject to unacceptable air quality effects (that are incapable of being overcome by a condition or planning obligation), taking into account the cumulative effects of other proposed or existing sources of air pollution in the locality. Sensitive receptors will be safeguarded at all times. Where detailed assessments are required, developments are expected to be at least air quality neutral, with air quality positive proposals strongly encouraged. In the interests of improving air quality borough-wide, all relevant development is required to install the following small-scale mitigation measures: 1. Low NOx heating, i.e. emitting less than 40mg NOx per kWh; 2. Electric vehicle charging infrastructure (points and cabling; or any new technology requirements); 3. Cycle storage that is sufficient and convenient (see Policy TP3: Parking Standards). In accordance with Policy TP 1: Transport Assessments and Travel Plans, transport assessments and travel plans are required for proposals above the limits set out in Table 8. Policies STR6: Transport and Parking. TP1: Transport Assessments and Travel Plans, and TP 2: Transport Design and Accessibility, also set out that	There are no LSEs of this policy alone. This is a positive policy outlining the Local Plan's objective to improve the air quality in the borough, particularly through reducing nitrogen deposition. This	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-

	contributions towards mitigation measures may be considered necessary. Applicants should have regard to the Council's guidance note on Electric Vehicle Charging Points for New Development. The use of sustainable transport measures, such as supporting sustainable public transport, shared transport initiatives, cycle/footways, improved connectivity, and green infrastructure (for example, green roofs, hedges, and street trees) to reduce pollution concentrations and exposure, are strongly encouraged (see Policies STR 5: Infrastructure and Connectivity; STR 6: Transport and Parking; EN 14: Green, Grey, and Blue Infrastructure; TP2: Transport Design and Accessibility; TP3: Parking Standards; OSSR 1: Retention of Open Space; and OSSR 2: The Provision of Publicly Accessible Open Space and Recreation).	policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	combination'.
Policy EN 22: Air Quality Management Areas (AQMA)	Development within, or able to impact upon, an Air Quality Management Area must follow the approach outlined in Policy EN 21: Air Quality and will be required to undertake an emissions mitigation assessment and cost calculation. These requirements also apply in the event that the Council designates an 'Air Quality Protection Zone' or equivalent. Subject to the results of the assessment and calculation, a Section 106 agreement will be used to secure contributions to mitigate this impact.	There are no LSEs of this policy alone. This is a positive policy outlining the provision of AQMAs in TWB. This policy neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 23: Biomass	The Local Planning Authority will support the deployment of biomass technology in locations off the gas grid where coal and oil-fired plant are currently used and where no cleaner or greener feasible alternative is available. The biomass must be locally sourced, and the developer will reduce potential air quality impacts	There are no LSEs of this	There are no LSEs of this policy 'in-

Technology	from the expansion in biomass heat through the use of high quality, low emission plant. Applications for biomass burners (i.e. for those that require planning permission and are not 'permitted development') will require a detailed Air Quality Assessment that, as a minimum, will include the following information: 1. The thermal capacity of the proposed biomass technology, and, if possible, its make and model; 2. The type of fuel to be used (preferably locally sourced); 3. Confirmation that it will be an approved appliance, compliant with Defra's latest guidance and the Clean Air Act; 4. The precise location of the proposed stack(s). Applications for biomass technology that burn fuel at a rate of greater than 45.4kg/hr will be required to gain chimney height approval from the Local Planning Authority.	policy alone. This policy details the provision of biomass technology across TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy EN 24: Water Quality, Supply and Treatment	All development must ensure that there is, or will be, adequate water supply and wastewater treatment facilities in place to serve the whole development (including all phases where applicable). Improvements to supply and treatment facilities, the timing of their provision, and funding sources will be critical to the delivery of development and will be supported. The Borough Council will consult with the Environment Agency and/or the relevant utility provider to ensure adequate provision and impose appropriate conditions as necessary. Where necessary, occupation of development is to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Access to the existing sewerage system must be provided for future maintenance and upsizing purposes. Development will be only permitted where it can be demonstrated that it would not result in: 1. Unacceptable risk to the quality or quantity of surface and ground water resources (including reservoirs); 2. Changes to groundwater and surface water levels that result in adverse impacts on:	There are no LSEs of this policy alone. This policy contains the positive provision of ensuring adequate water supply and wastewater treatment throughout TWB to support the anticipated increase in	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	a. adjoining land; and/or b. existing abstractions, amenity uses, natural habitats, or agricultural activities, including fisheries; and/or c. the quality of groundwater resources or potential groundwater resources; and/or d. river flows or the potential yield of ground water resources. Development that requires an abstraction licence from local watercourses will only be permitted in exceptional circumstances and where it can be demonstrated that there will be no significant adverse impact on the ecological functioning of the watercourse. Work beneath the water table will not be permitted unless there is a comprehensive ground water management scheme agreed for the construction, operation, restoration, and on-going management of the proposal. In terms of water conservation, all development must be planned positively to minimise its impact on water resources. This includes: 1. Minimising use of mains water; 2. Incorporating water saving measures, such as rainwater harvesting and greywater recycling systems (in both new development and by retrofitting existing buildings). All new residential dwellings must be designed to achieve a maximum water consumption rate of 110 litres per person per day, as measured in accordance with an approved methodology. New development that supports South East Water's Water Resources Management Plan will be supported.	population. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	
Policy EN 25: Flood Risk	Proposals for new development should contribute to an overall flood risk reduction, and development will only be permitted where it would not be at an unacceptable risk of flooding on the site itself, and there would be no increase to flood risk elsewhere. The sequential test and exception tests established by the NPPF will be strictly adhered to across the borough. Where it is demonstrated that development is unable to take place in an area of lower flood risk,	There are no LSEs of this policy alone. This policy outlines the	There are no LSEs of this policy 'in-combination' with other plans.

	essential transport or utility infrastructure, or other appropriate development may be allowed as per an exception test if the development is designed to be compatible with potential flood conditions also taking into account wider sustainable development objectives, and: 1. Suitable flood protection and mitigation measures are incorporated into the development appropriate to the nature and scale of risk; 2. Comprehensive management and maintenance plans are in place for its effective operation during the lifetime of the development (taking account of climate change); 3. Adoption arrangements are secured (where applicable) with the relevant public authority or statutory undertaker; 4. It can be demonstrated that adequate resistance and resilience measures have been put in place to avoid any increase in flooding, either on site or elsewhere. Site-specific Flood Risk Assessments will be required for the following development proposals: a. Sites within Flood Zones 2 and 3; and/or b. Sites in Flood Zone 1 that: i. are larger than one hectare; or ii. have been identified by the Environment Agency as having critical drainage problems; or iii. have been identified in a Strategic Flood Risk Assessment as being at increased flood risk in the future; or iv. may be subject to other sources of flooding. The site-specific Flood Risk Assessment shall be in accordance with guidance set out within the Council's Strategic Flood Risk Assessment, including the requirement for a contribution towards any necessary new flood defence or mitigation measures. It should also include the submission of a Flood Risk Emergency Plan. Where relevant, the assessment should also address the risk of flooding from surface water, ground water, and ordinary watercourses. Where there is evidence that water from these sources either ponds or flows over the proposed site, the assessment should state how this will be managed, and what the impact on neighbouring sites will be as part of a cumulative assessment.	Borough's aim to reduce flood risk. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Measures identified to mitigate effects shall be installed and maintained at the developers' own expense, or put into a management company (with associated evidence that the management company will operate in perpetuity) to ensure their long-term retention, maintenance,and management. Other flood resilient and/or resistant measures may also be required, and their provision will be informed by the findings of a submitted Flood Risk Assessment.		
Policy EN 26: Sustainable Drainage	All development applications should include adequate drainage provision. Drainage should be considered as an integral part of the development design process, with Sustainable Drainage Systems (SuDS) utilised unless where demonstrated to be inappropriate. SuDS should be designed and implemented to be 'multi-functional', and deliver other Local Plan policy objectives where appropriate, such as the support for habitats and biodiversity, water efficiency, and quality improvements, reinforcing local landscape character, enhancing the design of development, and the provision of amenity, landscape, and recreational open space All developments should aim to deliver a net reduction in run off, exceeding greenfield run off rates (mimic natural flows and drainage pathways), and ensure that surface water run off should be managed as close to its source as possible using the following hierarchy: 1. discharge into the ground; 2. discharge to a surface water body; 3. discharge to a surface water sewer, highway drain, or other drainage system. All drainage schemes must: i. manage all sources of surface water, including exceedance flows and surface flows from off site; ii. provide for emergency ingress and egress; iii. ensure adequate drainage connectivity. It will not be acceptable for surface water run off to enter the foul water system. SuDS or other appropriate measures should:	There are no LSEs of this policy alone. This policy details the provision for sustainable drainage in development applications. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	a. maintain public safety; b. provide sufficient attenuation to surface water flows as appropriate; c. ensure that there is adequate treatment of surface water flows,such that there is no diminution in quality of any receiving watercourse; d. ensure protection of ground water; e. provide or enhance wetland habitat and biodiversity where possible; f. use surface water features first (underground storage crates should only be used in exceptional circumstances where other measures are not possible). On sites considered to constitute major and strategic development, it should be shown how this infrastructure will be delivered over the different building phases to ensure that schemes are delivered as envisaged, and that ongoing and future flood risk is managed. Approval of the design and long-term management and maintenance of SuDS will be required prior to the development commencing.		
Policy EN 27: Noise	Development will only be permitted where it can be demonstrated (in line with the requirements of the Council's latest adopted Noise and Vibration Supplementary Planning Document) that: a. For noise-generating development, nearby noise sensitive uses (existing or planned, either through an extant planning permission or allocation in the Local Plan) will not be exposed to noise impact that will adversely affect the amenity of existing or future users; or b. For residential and other noise sensitive development, users and occupiers will not be exposed to unacceptable noise disturbance from existing or planned uses. Where appropriate, proposals will be required to mitigate noise impacts through careful planning, layout, and design. In assessing mitigation proposals, account will be taken of: 1. The location, layout, and design of the proposed development; 2. Existing levels of background noise; 3. Measures to reduce or contain generated noise; 4. Hours of operation and servicing.	There are no LSEs of this policy alone. This policy outlines the aim of reducing noise from development to a minimum. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Where noise-generating development or noise sensitive development is proposed and is likely to result in, or be exposed to, significant or unacceptable noise disturbance, applications should be supported by a Noise Impact Assessment undertaken by a competent person (as defined by the NPPF). Planning conditions and/or other means, such as financial contributions via Section 106 agreements, will be used to ensure that mitigation measures are satisfactorily undertaken.	be screened out.	
Policy EN 28: Land contamination	Development proposals on a site that is known, or suspected, to be affected by contamination will only be permitted (in line with the requirements of the Council's latest adopted Contaminated Land Supplementary Planning Document) where practicable and effective measures are taken to avoid: 1. Exposing the future occupiers and users of the development or people in the locality to unacceptable risk to health; 2. Threatening the structural integrity of any existing building or structure built on, or adjoining, the site; 3. Causing the contamination of any water course, water body, or aquifer; 4. Causing the contamination of adjoining land, its residents or users, or allowing such contamination to continue; 5. Damaging or putting at unacceptable risk the quality of the natural environment. A Risk Assessment, undertaken by a competent person (as defined by the NPPF) which includes a desk study, site walkover report, and preliminary risk assessment, must be provided at the earliest stage (i.e. pre-application, or as part of the submitted application), detailing the methodology by which risks will be addressed and ensuring the treatment and/or removal of all contaminants prior to the commencement of development, or as agreed by the Local Planning Authority where phased development is proposed. Planning conditions and/or other means, such as financial contributions via Section 106 agreements, will be used to ensure that such measures are undertaken.	There are no LSEs of this policy alone. This policy contains the provision of reducing land contamination. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Housing Policies			
Policy H 1: Housing Mix	Proposals for residential development should support the creation and maintenance of balanced communities by providing an appropriate housing mix with a range of sizes, type, and tenure of dwellings.	There are no LSEs of this policy alone.	There are no LSEs of this policy 'in-

	The mix should reflect any requirements set out in relevant policies in the Local Plan or a 'made' neighbourhood plan for the area, and may be informed by intelligence on local housing needs and demand, including that contained in local planning evidence base documents, parish housing surveys and other relevant analyses.	This policy highlights that housing proposals should include a mix of dwellings. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy H 2: Housing Density	Development should make efficient use of land, having full regard to the context of the site, including its character, landscape setting, topography, surrounding built form and access to infrastructure and services.	There are no LSEs of this policy alone. This policy outlines the density of new housing developments. It neither provides the quantum or location of new development. Therefore, there are no impact pathways	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

		present and this policy can thus be screened out.	
Policy H 3: Affordable Housing	**Overall approach** 1. Sites comprising mostly greenfield land (i.e. non previously developed land) delivering a net increase of more than nine dwellings will be expected to include a minimum of 40% of the gross number of residential units as on-site affordable housing provision. Where this percentage is not a whole number, it will be rounded up to the next whole number; 2. Sites comprising over half brownfield land (i.e.previously developed land) delivering a net increase of more than nine dwellings will be expected to include a minimum of 30% of the gross number of residential units as on-site affordable housing provision. Where this percentage is not a whole number, it will be rounded up to the next whole number; 3. Timing of affordable on-site housing provision: a minimum of 50% of the affordable housing to be delivered on site will be expected to be completed and transferred to a registered provider prior to occupation of a maximum of 50% of the open market units to be provided on site; 4. Sites within the High Weald Area of Outstanding Natural Beauty delivering six to nine dwellings will be expected to provide a financial contribution towards the provision ofoff-site affordable housing (land and build costs) based on 20% of the gross number of residential units to be provided on sites comprising mostly greenfield land, and 15% of the gross number of residential units to be provided sites comprising over half brownfield land. Where a financial contribution for off-site provision of affordable housing is payable, this shall be payable upon commencement of development, or as otherwise agreed with the local planning authority. **Local Connection** All forms of affordable housing will be provided on the basis of a 'local connection cascade'. The details of this cascade will be determined on a case by case basis, but will follow the general approach of prioritizing households with an established local connection (and for social and affordable rent) in housing need to the parish or town through residence or place of work, then households from surrounding parishes in	There are no LSEs of this policy alone. This policy sets out TWB's goals regarding affordable housing. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	the borough, and then wider. This will be secured by a Section 106 agreement. **Tenure** The general approach to tenure provision of on-site affordable housing should be that 60% is provided as social rent and 40% as intermediate tenures or other affordable routes to home ownership, subject to consideration of any subsequent local policy and/or evidence. **Exceptional Circumstances** There may be exceptional circumstances where the provision of on-site affordable housing is not viable. The Council considers that the following may represent exceptional circumstances, but in each case these circumstances would need to be fully demonstrated to warrant a departure from compliance with this policy: 1. The developer has provided written evidence that no Registered Provider will take the units and this had been demonstrated to the satisfaction of the Council and/or; 2. It is demonstrated that there is no realistic prospect of providing affordable housing by another means, other than through a Registered Provider; and/or 3. In relation to the tenure mix, where it can be demonstrated that the values of shared ownership or intermediate rented units would be too high in that particular locality: and/or 1. It can be demonstrated that the provision of the policy-compliant level of affordable housing would make the development unviable; 2. Where the Council considers that full provision of on-site affordable housing cannot be delivered, alternative delivery will be considered in the following order: a. the full affordable housing provision to be provided by the applicant on an alternative site agreed with the Council in (sequentially) (i) the settlement and (ii) the parish of the application site; and/or		

	b. a reduced level of affordable provision on the application site; and/or c. a variation in the tenure of the affordable housing; and/or d. the applicant to make land available elsewhere in (sequentially) (i)the settlement, (ii) the parish and (iii) the borough to provide the affordable housing for a registered provider; and/or e. a financial contribution in lieu of on-site affordable housing. **Design and layout approach to affordable housing** Affordable housing must be well integrated into the development: integration, together with the application of high quality design, use of good quality materials, and landscaping, should mean that the affordable housing is not visually distinguishable from the market housing (see Policy EN 1: Sustainable Design). Affordable housing should be sited so that it has equitable access to existing and new amenities in the locality, including recreation, leisure, open spaces, and community facilities. Homes may be 'clustered' to assist with management, but such clusters must be spread evenly across the development. In the case of developments that are flats and, where management and service charge arrangements are a practical consideration, the affordable units may be clustered together; for example, by block or staircase. **Building standards for affordable housing** All affordable housing should meet, as a minimum, the Building Regulation Standard Part M4(2). Where affordable housing is designed for households with a disability, the homes should meet the higher M4(3) standards: see Policy H 3: Housing for Older People and People with Disabilities.		
Policy H 4: Estate Regeneration	Proposals for estate regeneration will be supported, subject to any net loss in affordable housing being justified only in exceptional circumstances by the delivery of significant improvements to the quality, design, mix, and form of dwellings, and other public benefits.	There are no LSEs of this policy alone. This policy contains TWB's approach to estate regeneration. It neither provides	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways

		the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	present and this policy can thus be screened out 'in-combination'.
Policy H 5: Rural Exception Sites	Where no alternative site is available to meet local housing needs inside the Limits to Built Development, as defined on the Policies Map, development for rural exception housing outside the Limits to Built Development, will be permitted provided all of the following criteria are satisfied: 1. The site would be well related in scale and location to the settlement and its services. If the site is located further away from the main settlement, the developer will need to provide evidence that this is the closest available site, and how pedestrian links will be provided to the settlement; 2. The development would be of a suitable size and character in terms of layout, materials, and landscaping in relation to the settlement (and accords with other criteria set out in Policy EN 1: Sustainable Design; 3. The need for a local needs housing development can be demonstrated either through a parish or ward survey, drawing on information from the Housing Register and/or other local evidence. Information that is based on a wider geographic area will not be accepted as supporting evidence; 4. The local needs for affordable housing would not otherwise be met; 5. The development would not normally contain any open market housing. In exceptional circumstances, and in accordance with the NPPF, the inclusion within the scheme of a small proportion of open market housing may be considered acceptable in order to cross-subsidise the delivery of the affordable housing. Such proposals would require the submission of a full viability assessment to demonstrate that the market housing would only be built for enabling purposes. Enabling purposes would be strictly defined as allowing the affordable units to be built, with no extra profit being generated.	There are no LSEs of this policy alone. This policy provides for rural exception sites to be developed outside the Limits to Built Environment. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	Eligibility for rural exception housing will be determined through the Council's Housing Allocations Policy and through strict local connection criteria through residence, close family connection, and/or permanent employment in the parish or town. To ensure that the rural exception sites only provide housing for people with a local connection, eligible people will be those who live in accommodation that is unsuited to their circumstances through physical, medical, or social reasons and which is incapable of being improved or rendered suitable, including through repairs, adaptations, etc. at a reasonable cost, and satisfies one of the residential qualifications below: a. has lived in the parish or town continuously for the last three years; or b. has previously lived in the parish or town for a total of five years out of the last 10 years; or c. c. has immediate family who have lived continuously in the parish or town for the last three years; or for a total of five years out of the last 10 years; or d. be in, or about to take up, permanent employment in the parish or town; or e. e. provides an important service that requires residence in the parish or town.		
Policy H 6: Housing for Older People	Development proposals should have regard to meeting the housing needs of older people and people with disabilities in a manner proportionate to the scale of the proposal This includes: 1. Adaptations and alterations, including conversions and extensions, to enable people to live in their home, which will be supported where these meet the requirements of Policy H11 Residential extensions, alterations, outbuildings and annexes; 2. All new build housing development will be expected to meet the optional technical standard M4(2) for accessible and adaptable dwellings, as set out in the Building Regulations, unless demonstrably unviable; 3. On new build housing developments of 20 or more homes, at least 10% of homes should be suitable for older people in that they are bungalows or 1 or 2 bed flats/houses; 4. On new build housing developments of 20 or more homes, at least 5% of the affordable housing element will be expected to meet the optional technical standard M4(3) for wheelchair user dwellings, to support people with physical disabilities, where a need has been identified in the parish or ward (by the Housing Authority); 5. In addition to sites specifically allocated for specialist housing, such schemes, will be supported on sites	There are no LSEs of this policy alone. This policy outlines the provision of housing for older people in TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	identified for residential development and other suitable sites, including extensions to existing schemes, particularly inaccessible locations, subject to other policies of the Local Plan being satisfied. **Amenity space and parking provision** Older persons' housing should incorporate amenity, or garden space appropriate to the nature of the scheme. Housing schemes for older people will not be required to make contributions to provide for children's play space. Sheltered housing schemes (including Extra Care or equivalent) that make an appropriate contribution to communal amenity space are not required to make provision for open space for youth or adult use. On-site parking will be required, for both residents and visitors, and should not diminish the character of the street scene. Where appropriate, pick up and drop off facilities for taxis (with suitable kerbs), minibuses, and ambulances will be required, as well as suitable on-site storage and charging facilities for mobility scooters. **Affordable housing** Affordable housing should be provided in accordance with the general affordable housing policy, Policy H3: Affordable Housing		
Policy H 7: Rural Workers' Dwellings	Outside the Limits to Built Development as defined on the Policies Map, proposals for the erection of a rural worker's dwelling will not be permitted unless all of the following criteria are satisfied: 1. It is established to be essential for the proper functioning of the enterprise for a full time worker, or one who is primarily employed in the business, to reside on the site to provide essential or emergency on-site care for agricultural, or business, or forestry purposes that could not be carried out satisfactorily by the worker living off-site; even with the use of up to date technology; 2. No existing accommodation on the site or in the immediate area is suitable (such as by conversion), to achieve the essential functioning of the enterprise; 3. A dwelling has not been sold off separately from the site or holding during the previous 10 years, nor has the site formed part of a larger unit previously served by such a dwelling at any time during this period; 4. The size and scale of the new dwelling would be appropriate for the purpose for which it would be required	There are no LSEs of this policy alone. This policy states that rural workers' dwellings shall only be permitted in exceptional circumstances. It neither provides the quantum or location of new development.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	in relation to the income the unit can sustain and the needs of the business enterprise, and would provide reasonable family accommodation. An independent report will be required, showing the need for development and financial soundness of the business. This should cover existing and future requirements, and the number of workers that will be involved. It is expected that this report, and any assessment required to be undertaken by the Council, will be funded by the applicant; 5. That if the unit and business concerned have not been established for three years, the business has demonstrated it will be financially sound. If the unit and the business concerned has been established for at least three years, it should have been profitable for at least one of them, be currently financially sound, and have a clear prospect of remaining so; 6. The location, scale, and design of the dwelling should not significantly harm the visual amenities of the landscape character when assessed against other relevant policies of the Plan; 7. In all cases, the granting of planning permission will be subject to conditions or legal agreement restricting the occupancy of the dwelling to rural workers, and permitted development rights will be removed. **Note: Temporary permission** If a new dwelling is required, it should be provided by a caravan in the first three years. There should be a firm intention and ability to continue with the business. Temporary permission will not be granted in locations that would not permit a permanent dwelling. When temporary permission is granted, it should not be assumed that permanent permission will automatically follow, as establishing an essential need for, and the ability to sustain, the residence will need to be reapplied. In all cases, the granting of planning permission will be subject to conditions or legal agreement restricting the occupancy of the dwelling to rural workers, and permitted development rights will be removed. Where the Local Planning Authority is concerned about misuse, the history of the holding will be investigated.	Therefore, there are no impact pathways present and this policy can thus be screened out.	
Policy H 8: Self Build and Custom Housebuilding	The Council will encourage self-build and custom house building schemes on non-allocated windfall developments (subject to compliance with other Policies in the Local Plan). In addition, the Council will require approximately 5% (rounded up to the nearest whole number) of dwellings (as serviced plots) of the total net number of dwellings at the following site allocations:	There are no LSEs of this policy alone. This policy	There are no LSEs of this policy 'in-combination' with other

	a. Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road (Policy AL/RTW 5); b. Land to the west of Eridge Road at Spratsbrook Farm (Policy AL/RTW 16); c. The Strategy for Tudeley Village (STR/SS 3); To be provided for self-build and custom housebuilding. The provision of self-build and custom house building development will be in addition to the level of affordable housing required by Policy H 3: Affordable Housing. Unless the proposal is for a small scheme for which the applicant(s) intends to reside in themselves, once planning permission has been granted, the self-build and custom housebuilding plots will need to be advertised and marketed to the Council's Self-Build and Custom Housebuilding Register and through any relevant trade organisations for at six months. This marketing, including at what point it should begin in the site's development and how, may be secured through a Section 106 agreement or condition. Evidence of this marketing will also be required as part of any Section 106 agreement or condition. If a plot/s has been marketed for six months, and a buyer has not been found, it is advisory that the plots are then offered to the Council to increase the chance of plots being developed. If a buyer is not found then the owner of the plot can build for sale on the open market.	neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy H 19: Gypsies and Travellers	To meet the accommodation needs for Gypsies and Travellers over the plan period, proposals for additional pitches as identified in Table 9 above as shown on the Policies Map, will be permitted subject to providing the highlighted site-specific mitigations and meeting all the criteria below, as applicable: 1. The density of pitch provision within the application site is maximised, having regard to the minimum separation distances between mobile homes/caravans/etc as required by any relevant legislation or guidance; 2. The proposal would not cause harm to character or appearance of the landscape, and must be well-screened by existing or additional native vegetation and physically contained by landscaping. This screening should be maintained permanently, and while additional planting could supplement existing landscaping, it should not be used as the only way the impact of new developmentis mitigated.High fences will not be acceptable for the purposes of screening; 3. Any accommodation provided on the site must be consistent with a nomadic lifestyle;	There are no LSEs of this policy alone. This policy provides details regarding gypsy and traveler sites. It neither provides the quantum or location of new development. Therefore, there are no impact pathways	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	4. The scale of the proposed development, when considered together with existing gypsy and traveller pitches on the site and within the parish, must not be of an unduly large scale relative to the nearest settled community; 5. Foul drainage to a public sewer should be provided where possible. Where it is not, evidence will need to be provided showing that suitable alternative facilities can be provided; 6. Parking provision must be made in accordance with the parking standards as set out in Policy TP 3: Parking Standards; 7. There is adequate provision for storage and maintenance of equipment, where required. Proposals that would result in a reduction of the number of pitches within the borough will be refused unless a suitable replacement is found, or the need no longer exists. In exceptional circumstances, other proposals for Gypsy and Traveller pitches will be permitted where all of the above criteria are met.	present and this policy can thus be screened out.	
Policy H 10: Replacement dwellings outside the Limits to Built Development	Outside the Limits to Built Development, as defined on the Policies Map, proposals for replacement dwellings in the same residential curtilage as an existing dwelling, will be required to satisfy all of the following criteria: 1. The existing dwelling must benefit from a lawful residential use (this does not include any form of temporary planning permission, a residential use that has been abandoned or has any planning conditions relating to occupancy restrictions). In addition, mobile homes and other forms of temporary accommodation will not be classed as an existing residential dwelling for the purposes of this policy; 2. Demolition of all or part of the existing dwelling must be justified on the basis that the existing structure is rendered unsafe; for example, unsound construction, subsidence, or is inherently constructed to a poor quality/constructed of poor materials and it would not be viable to rectify these as part of a modernisation or refurbishment project. Demolition may also be justified where a building Is poorly sited, such as immediately adjacent to a highway, or is considered to be unduly obtrusive by virtue of its design and/or use of materials; 3. Where the existing dwelling is a heritage asset, first consideration should be given to its retention, having	There are no LSEs of this policy alone. This policy details the dimension / measurement of replacement dwellings in TWB. It neither provides the quantum or location of new development. Therefore, there	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	regard to relevant NPPF policies. Where a dwelling is to be replaced: a. The scale, form, external appearance, height, and massing of the replacement dwelling and any associated development and works, shall be no more visually obtrusive in the landscape than the original dwelling (the building as it existed on 1 July 1948, or, in the case of a building constructed after 1 July 1948, as it was first built) and shall be compatible with its rural location in terms of architectural and visual amenity, landscape setting, and any existing surrounding development; b. Any proposed increase in volume, including any previous additions to the property, will not result in an increase of more than 50% of the gross volume of the original dwelling (the gross volume will be ascertained by external measurements taken above ground level and include the volume of the roof), subject to a maximum of 250 cubic metres (gross). All other existing outbuildings, including garages, will be excluded from the calculation of the volume of the original dwelling. If the existing dwelling has already been extended by 50% (or more) above the original, then no further increase in volume will be permitted for the replacement dwelling; c. The replacement dwelling shall be located on the footprint of, or as close as practically possible to, the existing dwelling, unless an alternative location would result in clear landscape,access, or local amenity benefits. In the event that the dwelling is relocated, the removal of the existing dwelling upon completion of the new dwelling will be secured by way of planning condition or legal agreement; d. The proposal shall not cause significant harm to the amenities of occupiers of neighbouring properties and uses in terms of loss of privacy immediate outlook, daylight, and sunlight. In order to protect the character of the dwelling and the landscape, and particularly in sensitive locations, such as the Area of Outstanding Natural Beauty and Green Belt, permitted development rights for any further extensions, alterations, outbuildings, hardstanding, and boundary treatments may be removed and external lighting strictly controlled.	are no impact pathways present and this policy can thus be screened out.	
Policy H 11: Residential extensions, alterations,	Extensions, alterations, outbuildings, and annexes to existing dwellings both within and outside the Limits to Built Development, as defined on the Policies Map, will be permitted if in accordance with all of the following criteria:	There are no LSEs of this policy alone.	There are no LSEs of this policy 'in-combination'

outbuildings, and annexes	1. They are compatible with the character and appearance of the main dwelling and its setting in terms of design, siting, layout, size, mass, height, form (including roof form), external finishing materials, and detailing; 2. They do not significantly harm the amenities of neighbouring properties in terms of direct overlooking to main habitable room windows and/or private amenity areas resulting in loss of privacy; 3. They do not significantly harm the amenities of neighbouring properties in terms of loss of immediate outlook/dominance, resulting in an overbearing impact, loss of daylight/sunlight, and over shadowing of habitable (as defined above) room windows and private amenity areas; 4. They would retain usable and reasonable external space for garden/amenity, refuse, recycling, and cycle storage, and the parking and turning of vehicles to meet the continuing needs of the dwelling. In all cases, the proposal will be ancillary to the main dwelling in terms of use and scale and shall not be used for separate occupation or be capable of being sold separately. Where appropriate, these restrictions will be secured by way of planning condition or legal agreement. In addition to the above criteria, residential extensions outside the Limits to Built Development, as defined on the Policies Map, shall only be permitted where: a. the scale, form, and massing of the proposal would not result in a disproportionate addition over and above the size of the original dwelling (the building as it existed on 1 July 1948, or, in the case of a building constructed after 1 July 1948, as it was first built) and would not detract from its rural setting and the visual amenities of the surrounding countryside; and b. proposed extensions, including any previous additions to the property, would not result in an increase of more than 50% of the gross volume to the dwelling (based on external measurements taken above ground level and including the volume of the roof) of the original dwelling, subject to a maximum of 250 cubic metres (gross). All other existing detached outbuildings, including garages, will be excluded from the calculation of the volume of the original dwelling. In the case of a dwelling already having been extended by 50% (or more) above the original, then no further increase in volume will be permitted and permitted development rights for further extensions/structures may be removed.	This policy addresses changes to existing housing in TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	with other plans. There are no impact pathways present and this policy can thus be screened out ‘in-combination’.
Policy H 16:	Outside the Limits to Built Development, as defined on the Policies Map, extensions to residential curtilages	There are no	There are no

Residential extensions, alterations, outbuildings, and annexes in the Green Belt and outside the Limits to Built Development	will not be permitted unless it can be shown that all of the following criteria can be met: 1. It is reasonably necessary for the safe access and proper management of a dwelling, such as the provision of sufficient outside space for the servicing and maintenance of the property; and it is demonstrated in a design and access statement that all other alternative options to address a particular issue have been investigated, with the reasoning for discounting those set out; 2. The proposed means of enclosure and any gates would be sympathetic to the character of the adjoining countryside; 3. It would be an appropriate size in the context of the site and would not result in an unacceptable impact on the landscape character of the area; 4. It would not result in unacceptable harm to the amenity of users of publicly accessible open spaces and Public Rights of Way in the surrounding landscape; 5. The proposal would not adversely affect the proper functioning or use of adjoining agricultural land. In exceptional circumstances, extensions to residential curtilages may be permitted where, as a direct result, there would be clear landscape and/or biodiversity benefits through the realignment of the boundary, restoration of landscape features, or the removal of elements that detract from the landscape. In order to protect landscape character, and particularly in sensitive locations, such as the Area of Outstanding Natural Beauty and Green Belt, permitted development rights for extensions to the dwelling, outbuildings, hardstandings, and boundary treatments may be removed and external lighting strictly controlled.	LSEs of this policy alone. This policy relates to design changes of existing residential dwellings outside the Limits to Built Development. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Economic Policies			
Policy ED 1: The Key Employment Areas	The Key Employment Areas, as defined on the Policies Map, are designated for the provision of employment uses to serve the borough over the plan period. The retention of existing, and proposals for new, employ ment provision, to include the following uses, will be acceptable within these defined areas. Defined Key Mix of uses appropriate	Likely Significant Effects Presents This policy identifies the location of new	Likely Significant Effects Presents This policy

	Employment Area		employment areas to be provided during the Plan period of 2020-2038. Potential impact pathways are present: • Urbanisation • Atmospheric Pollution	identifies the location of key new employment areas to be provided during the Plan period of 2020-2038. Potential impact pathways are present: • Urbanisation • Atmospheric Pollution
	Royal Tunbridge Wells Town Centre	Class E – including retail, financial, professional services and other business uses , food and drink, non residential institutions, assembly and leisure, education and health Class F – appropriate leisure uses Class C – Hotels, dwelling houses and residential Institutions and other sui generis uses of an appropriate type and scale including drinking establishments and hot food takeaways		
	Royal Tunbridge Wells North Farm/Longfield Road area	Class B – general industry and storage and distribution Class E – financial, professional and other business uses, retail, food and drink and leisure Class F – appropriate leisure uses and other sui generis uses of an appropriate type and scale		
	Southborough High Brooms Industrial Area	Class E – financial, professional and other business uses and appropriate leisure uses Class F – appropriate leisure uses Class B8 - storage and distribution and other sui generis uses of an appropriate type and scale		
	Paddock Wood Eldon Way and West of Maidstone Road	Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution		
	Paddock Wood Transfesa Road East and West	Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution		
	Gill's Green Business Park	Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution		

	Capel Farm Brook Class E – financial, professional and other business uses Class B2 – general industry Class B8 - storage and distribution Proposals for the retention of existing floor space and the encouragement of new floor space in the Key Employment Areas on allocated and non-allocated and vacant sites, and through the intensification or redevelopment of existing sites, will be supported in principle.		
Policy ED 2: Retention of existing employment sites and buildings	Existing employment sites and buildings will be retained in their existing use or an alternative employment generating use to support the vibrant and balanced economy of the borough, taking into account whether they: 1. Are well located to a main road and public transport networks; 2. Provide, or are physically and viably capable of providing, through redevelopment, good quality modern accommodation attractive to the market; 3. Are capable of meeting a range of employment uses to support the local economy. Applicants seeking to redevelop/convert existing employment buildings and sites must demonstrate the following: a. provide robust evidence to show that the site has been proactively marketed, at the appropriate price, and using relevant publications, for the existing use or other potentially suitable employment generating uses; b. provide evidence that there is no prospect of the existing buildings, or the partial or comprehensive redevelopment of the existing buildings, continuing for the current use; c. marketing must be for a period of at least 18 months at a time when the site is available, or will be available within an acceptable timeframe, with an appropriate agent; d. where it has been demonstrated, through an independent assessment, that the current use is no longer viable and that there is no reasonable prospect of continued use or take up of other employment generating uses during the plan period, proposals for redevelopment must consider alternative uses in the following order	There are no LSEs of this policy alone. This economic policy contains the provision of retaining key employment areas in TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	i. other business uses; ii. all other non-residential, employment generating uses; iii. residential employment generating uses (C1, C2); iv. a mixture of residential and employment generating uses, including 'live/work' units; v. wholly residential schemes (C3). Redevelopment of employment buildings and sites for mixed use may be permitted where such development: 1. Would facilitate the regeneration of the site to more effectively meet the needs of modern business; 2. Where the employment capacity of the site, represented by commercial floorspace, is maintained; 3. Where a mixed use development would represent a sustainable approach consistent with the general distribution of development. Where the review of submitted information by an independent consultant is considered necessary, it is expected that the applicant will cover the cost of this.		
Policy ED 3: Digital communications and fibre to the premises (FTTP)	Proposals to improve the digital communications network in Tunbridge Wells borough, including through the provision of mobile data networks (such as 5G mobile data), will be supported, subject to compliance with relevant policies in this Plan, and with national policy. All residential and employment developments within the Limits to Built Development of Royal Tunbridge Wells, Southborough, Paddock Wood and land at east Capel, Hawkhurst, Cranbrook, Pembury, and Tudeley Village, including site allocations promoted in this Plan, will enable FTTP or other wireless solutions. In other areas, all residential developments over five dwellings and employment proposals of 500sqm or more (including through conversion) will enable FTTP or other wireless solutions. For schemes under these thresholds, the Council's expectation is that provision for FTTP or other wireless solutions will be achieved, wherever practical.	There are no LSEs of this policy alone. This economic policy contains the provision of digital communications and fibre internet to TWB homes. It neither provides the quantum or location of new development.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-

	For sites of less than five dwellings or 500sqm of employment space, or where it can be demonstrated that FTTP is not practical due to special circumstances, (such as issues of viability, the inability to provide the appropriate physical trench, and proximity to the nearest break out point on the fibre network), then other non-Next Generation Access technologies, including wired and wireless infrastructure, providing all-inclusive internet access speeds in excess of 24Mbps, should be delivered wherever practical.	Therefore, there are no impact pathways present and this policy can thus be screened out.	combination'.
Policy ED 4: Rural Diversification	Development that forms part of a farm diversification scheme, or otherwise helps maintain the viability of rural businesses engaged in sustainable land management, will be permitted where the following criteria are met: 1. A diversification/farm business plan is submitted, which demonstrates that the proposed development does not cause severance or disruption to the agricultural holding and would not necessitate the need for additional buildings to continue farm operations as a result of the reuse of existing buildings for other uses; 2. The proposed development will need to demonstrate that the proposals will stimulate new economic activity with a use appropriate to its rural location; 3. The development reuses or replaces existing buildings where feasible. Where this is not feasible, the development should be related physically and functionally to existing buildings, be of an appropriate scale, and retain agricultural character; 4. Any new building should respond sensitively to its rural setting in terms of its scale, layout,design, and use of materials, and have regard to the Farmsteads Assessment Guidance for Tunbridge Wells Borough SPD (2016), where relevant; 5. The proposed development would not create an unacceptable impact on the local road network, or require highway improvements that would harm the landscape or ecological value of rural roads in the area. Where the above requirements are satisfied, the Council will, where appropriate: a. remove permitted development rights for any new buildings; and/or b. use conditions attached to the planning permission, or require the applicant to enter into a legal agreement to ensure that any new building is tied in perpetuity to the existing agricultural holding;	There are no LSEs of this policy alone. This economic policy encourages development that diversifies farming / agricultural uses in TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	and/or c. enter into a land management agreement/plan where appropriate.		
Policy ED 5: Conversion of Rural Buildings outside the Limits to Built Development	Priority will be given to the retention and conversion of existing agricultural or other suitable buildings in the countryside for business, recreation, and tourism uses. The conversion of such buildings to residential use will only be permitted in exceptional circumstances in accordance with the criteria set out below. Proposals for the conversion of existing agricultural or other suitable buildings outside the Limits to Built Development, as defined on the Policies Map, will be required to satisfy all of the following criteria: 1. Conversions to alternative uses shall not compromise the existing or likely future operation or management of the land for farming or forestry, or result in the need for further buildings as a result of displacement; 2. The building is of permanent, substantial and sound construction and capable of conversion to the proposed use without significant reconstruction, modification, or additions. Any required extensions will be modest in size, and the minimum necessary for the use proposed; 3. The proposed use will not be harmful to the character, amenity, and tranquillity of the area; 4. Proposed alterations to the building and provision of, or changes to, access arrangements shall be inkeeping with the character and appearance of the building and its wider landscape setting in terms of materials, design, and form, and shall not cause harm to the local landscape character or features; 5. A full programme of works detailing exactly what the conversion entails, from initial structural survey and analysis work through to completion, shall be submitted with any planning application. The programming of the work to be undertaken will be controlled by way of a planning condition attached to any permission granted; 6. The building should be capable of conversion without requiring additional outbuildings or a material or significant change to the setting of the building;	There are no LSEs of this policy alone. This economic policy outlines the plans for prioritizing the conversion of existing buildings for business use. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	7. The curtilage of the building shall be drawn as tightly as possible, while allowing adequate space for parking/turning for the proposed use, and the storage of business equipment where applicable, without detriment to the visual amenities of the countryside or the local landscape character; 8. The new development shall not significantly increase traffic to cause material harm to the safety of the local highway network; 9. Landscaping proposals (hard and soft landscaping), including details of sensitive boundary treatments and any changes in levels, shall be designed to enhance both the immediate landscape setting of the building and the wider rural locality. Additionally, for residential conversions: a. The building shall be worthy of retention for its historic or architectural value and makes a positive contribution to the landscape character, or is required as part of a whole farm plan and no other use is viable; b. The building should form part of a farmstead or be in a sustainable location with suitable access, including safe options for non-motorised transport, to existing services and facilities. The conversion of buildings that are physically, or appear, separated from existing farms and other built development, such that it would significantly harm the rural landscape, will not be permitted; c. It shall be demonstrated that the living conditions of future occupiers will not be harmed by proximity in relation to existing neighbouring uses, including farm activity (such as the movement of farming equipment, livestock, crop spraying), noise, and odours; d. It has been clearly demonstrated that reasonable attempts have been made, without success, to secure a business reuse for the building and that uses other than e. residential are not viable. This should include details of active marketing at an appropriate value/rate and any interest received for a minimum period of 18 months. Where a conversion is permitted for tourism accommodation, a holiday occupancy condition will be attached preventing the use as a sole or main residence. In order to protect the character of the building and the landscape, such as the Area of Outstanding Natural Beauty and Green Belt, permitted development rights for extensions, alterations, outbuildings, hardstanding,		

	and boundary treatments may be removed and external lighting strictly controlled.		
Policy ED 6: Commercial and Private Recreational (Including Equestrian) Uses in the Countryside	Proposals for the development of commercial recreational uses in the countryside will only be permitted where: 1. Priority is given to the conversion of existing buildings over newly built development; and in the case of a new facility, it is satisfactorily integrated with existing buildings where they are present; 2. All new development is appropriate and sympathetic to its surroundings in terms of design, scale, siting, external materials, and appearance to avoid an adverse impact on the wider landscape, and the application demonstrates how it has regard to the advice documents listed in the supporting text above; 3. Proposals are not sited in prominent or isolated locations; 4. The proposal would not have a detrimental impact on the landscape setting of the area (including any existing trees and hedges), protected species and biodiversity, sites of nature conservation interest, archaeological, or heritage assets; 5. Proposals sited in the High Weald AONB conserve and enhance its special landscape character and setting; 6. There is no significant detrimental impact on residential amenity; 7. Consideration is given to the cumulative impact of such development and its associated facilities (for example, access and hardstanding, storage and utilities) on landscape character and features; 8. The proposal is accompanied by an integral landscaping scheme, including sympathetic boundary treatments that reflect the character of the adjoining countryside; 9. Access and parking provisions are acceptable and the use does not significantly increase traffic to the detriment of the rural area or highway safety;	There are no LSEs of this policy alone. This economic policy contains detail about development of recreational sites in the countryside. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	10. Where appropriate, adequate provision is made for the security of the site in terms of the proposed development in relation to the manager/owner of any animals; 11. Adequate provision is made for foul and surface water drainage; 12. The proposal would not involve any changes inland levels by raising, excavation, or other engineering works which would be harmful to the character, appearance, and landscape setting of the area. Proposals will only include external lighting where it is demonstrated to be necessary, and designed so as not to impact any neighbouring properties or the wider countryside, the details, design, siting, and intensity of which should be submitted with any development proposal. External lighting will not normally be permitted in rural areas in accordance with Policy EN 8: Outdoor Lighting and Dark Skies.		
Policy ED 7: Retention of, and improvements to existing, and the promotion of new tourist accommodation and attractions	**Retention of existing tourist accommodation** The retention of existing tourism accommodation (both serviced and non-serviced) will be supported where it is well located and attractive to the market. Where proposals are brought forward for the change of use of existing tourism accommodation, the following criteria considerations will be applied: 1. Sufficient evidence of marketing the building as an operational tourist facility over the last three years, or number of years trading if less. This should include brochures, advertisements, websites, entries in accommodation guides, etc; 2. Sufficient evidence that the property has been marketed for sale for at least 18 months at a market price, which reflects the existing use as tourism accommodation, and the condition of the building. Evidence of marketing the property should be submitted to the Council: to include details of agent/sused; copies of brochures and advertisements and dates; records of response; interest shown; and offers received with reasons for being rejected, if appropriate; 3. Sufficient evidence of a comprehensive Business Plan to include any upgrading or promotion of the premises by the present owner to increase its attractiveness to the market. The Council may require the review of this submitted information by an independent consultant: it is expected	There are no LSEs of this policy alone. This economic policy contains the provision of retaining and promoting new tourism opportunities within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	that the applicant will cover the cost of this. **New, or improvements to, tourism accommodation and visitor attractions** New visitor accommodation and visitor attractions and the upgrading of any existing provision will be supported, where it increases the range and/or quality of tourist facilities. Proposals to provide new sustainable tourism accommodation development, including hotels, guesthouses, bed and breakfast establishments, outdoor accommodation, self catering accommodation, and new visitor attractions will be supported subject to the following: a. The anticipated traffic generation will not harm highway safety and whether the location is readily accessible by a range of means of transport, including walking and cycling, and by public transport; b. Acceptable impact on local and landscape character, particularly in relation to impact on the designated Area of Outstanding Natural Beauty and openness of the Green Belt; c. Consideration of the relationship to existing tourism development and facilities, including whether the proposal will contribute to the diversification of tourist attractions in the borough; d. The impact on residential amenity in the locality. The proposal will be assessed against all other relevant policies in the Local Plan.	policy can thus be screened out.	
Policy ED 8: Town, Rural Service, Neighbourhood and Village Centres Hierarchy	To ensure the long-term vitality and viability of the centres across the borough, the Council will apply a 'town centre and allocated site first' approach to proposals for retail, leisure, and other main town centre uses. Development should be appropriate to the size and function of the centre within which it is to be located. The defined centres hierarchy for the borough includes the defined primary regional, town, rural service, neighbourhood centres, and village settlements (as defined by the Limits to Built Development).	There are no LSEs of this policy alone. This economic policy details the settlement	There are no LSEs of this policy 'in-combination' with other plans.

Type of Centre	Centre
Primary Regional Town Centre	1. Royal Tunbridge Wells
Town Centre	1. Cranbrook 2. Paddock Wood 3. Southborough
Rural Service Centre	1. Hawkhurst
Neighbourhood Centres	1. Hawkenbury 2. High Brooms 3. Knights Wood 4. North Southborough 5. Sherwood 6. Showfields 7. Silverdale 8. St Barnabas and possibly to include parts of Camden Road? 9. St Johns 10. St Peters 11. Within Paddock Wood including land in east Capel*
Village Settlements	1. Benenden 2. Bidborough 3. Brenchley 4. Five Oak Green 5. Frittenden 6. Goudhurst 7. Horsmonden 8. Lamberhurst 9. Langton Green 10. Matfield 11. Pembury

hierarchy within TWB. It neither provides the quantum or location of new development.

Therefore, there are no impact pathways present and this policy can thus be screened out.

There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	12. Rusthall 13. Sandhurst 14. Sissinghurst 15. Speldhurst 16. Tudeley Village *New neighbourhood centres will be designated as part of the extension of Paddock Wood (including land in east Capel) and at the new Tudeley Village, which is expected to include a village centre, as well as a number of smaller neighbourhood centres, to be defined through the masterplanning process and the resultant SPD.		
Policy ED 9: Defined Town and Rural Service Centres	Within the town and rural service centres, as defined on the Policies Map, planning permission will be granted for development of a range of appropriate uses where they contribute to the vitality and viability of the centre and/or respond to changing needs/trends over the life of the Local Plan. The Council will seek to enhance the established character and diversity of centre uses, and may resist the over-concentration of particular uses that would be detrimental to the character and function of an area, or to the vitality or viability of the centre. Development proposals within the defined centres should be of an appropriate scale in accordance with its functional position in the retail hierarchy as set out in Policy ED 8.	There are no LSEs of this policy alone. This economic policy outlines the service needs for town and rural service centres. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy ED 10: Sequential test	**Sequential Test**	There are no LSEs of this	There are no LSEs of this

and local impact test	1. Proposals for retail, office, and leisure uses should be located in an identified centre, unless: a. by means of a sequential approach, it is demonstrated that the proposal could not be accommodated firstly on a site within an existing centre; secondly, on a site located at the edge of an existing centre; then thirdly, it is demonstrated that where the proposal could not be accommodated on a site within or at the edge of an existing centre, it is located in a well-connected and accessible out-of-centre location (in accordance with criterion 2 below); and b. by means of an impact assessment (as set out below) it is demonstrated that a retail, office, or leisure proposal would not result in a significant adverse impact, cumulative or otherwise, on the vitality and viability of an existing centre or undermine the delivery of a site allocated for the use proposed; or c. the development is on a site allocated for that use in the Plan; or d. the development is designed to only serve the needs of the neighbourhood. 2. Proposals located at the edge of an existing centre or out of centre should ensure the provision of specific measures that will improve the quality and function of sustainable connections to the centre, in particular walking and cycling routes, and public transport links. The nature and extent of the measures will be directly related to the scale of the proposal. **Local Impact Test** 3. Applications for development above the following thresholds outside of the town and rural service centres, as defined on the Policies Map, should be accompanied by an impact assessment: a. where there is a potential impact on Royal Tunbridge Wells: 1,000sqm (net); b. where there is a potential impact on Southborough, Paddock Wood, Cranbrook and/or Hawkhurst: 280sqm (net) ; 4. The impact assessment should include: a. the impact of the proposal on existing, committed, and planned (where this information is publicly available) public and private investment in the above centres in the catchment area of the proposal;	policy alone. This is an economic policy relating to impact testing of town centre proposals. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	b. the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years fromthetimetheapplicationis made. For major schemes where the full impact will not be realised in five years, the impact should also be assessed up to 10 years from the time the application is made; c. the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed. 5. Applicants should demonstrate flexibility on issues such as format and scale, and will be expected to provide the Council with robust evidence of this. 6. Where an application fails to satisfy the sequential test, or is likely to have an adverse impact, it will be refused.		
Policy ED 11: Primary Shopping Areas and Retail Frontages	Primary Shopping Areas and Primary Retail Frontages within the centres of Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook, and Hawkhurst are defined on the Policies Map. 1. To ensure that commercial uses defined by Use Class E Commercial, Business and Services remain the predominant uses within the defined Primary Shopping Area and defined primary retail frontages, new development, including that with residential above ground floor, will be permitted where: a. The proposal is forCommercial E Class use at ground floor (or ground floor plus higher storeys); or b. The proposal is for other town centre uses falling outside of Class E that would support the overall vitality and viability of the centre and fall within sui generis uses to include the following: i. public houses, wine bars or drinking establishments; ii. hot food takeaways; iii. live music venues; and 2. Change of use of ground floor premises in these areas will be permitted where the proposed use: a. Retains an active frontage and maintains or enhances the vitality, attractiveness, and viability of the primary shopping frontage and the wider commercial area; or b. Is complementary to the shopping/commercial function of the area and provides a direct service to the public; c. Is for a temporary period to occupy temporarily vacant units such as for occupiers testing new business concepts, a pop-up store or for use for events which would support the vitality and viability of	There are no LSEs of this policy alone. This is an economic policy addressing the development of shopping areas in town centres. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	the Town Centre; and d. Does not result in an over-concentration of sui generis uses within one area, and contributes to an appropriate mix and diverse offer. Change of uses of ground floor premises to residential or other non-commercial or suit generis type uses as listed above will not normally be permitted, although changes of use to residential at first floor in such locations generally will be supported and encouraged, subject to conformity with other policies in the Local Plan.	be screened out.	
Policy ED 12: Retention of Local Services and Facilities	Proposals that would result in the loss of a local facility or service which serves a local need will not be permitted unless it can be clearly demonstrated that: 1. Suitable and/or comparable alternative provision is available within the defined centre or close locality; 2. For commercial uses, it is: a. not viable, or unlikely to become commercially viable, to operate the number of existing services/facilities within the centre, b. it has been the subject of appropriate marketing for a period of 18 months and consideration has been given to other alternative commercial uses; 3. In the case of public facilities, demand within the locality no longer exists, or there are clear operational reasons for closing, or moving the facility and the wider importance of the facility to the community has been taken into account. The Council may require the review of any submitted information by an independent consultant; it is expected that the applicant will cover the cost of this.	There are no LSEs of this policy alone. This economic policy contains the provision of retaining local services near identified centres. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Transport and Parking Policies			
Policy TP 1: Transport	Development proposals must:	There are no LSEs of this	There are no LSEs of this

Assessments, Travel Plans and Mitigation	1. Demonstrate that the impacts of trips generated to and from the development are accommodated, remedied, or mitigated to prevent significant residual impacts, including where necessary an exploration of delivering mitigation measures ahead of the development being occupied; and 2. Provide a satisfactory transport assessment for proposals that reach the required threshold levels set by Kent County Council's Guidance on Transport Assessments and Travel Plans and in Highways England guidance (see Table 8 above); and 3. Demonstrate that the development complies with the requirements of Policy EN 23: Air Quality and the 'emissions mitigation assessment and cost calculation'. Furthermore, all development will be required to be accompanied by a transport assessment and a travel plan if the location of the development has existing traffic issues or lack of transport infrastructure, as identified by the Local Highway Authority. Where adequate transport infrastructure is not available to serve the development, the Local Planning Authority will seek the provision of, or contributions towards, appropriate measures that will address the identified inadequacy, and which will enable active travel and provide other highway improvements. As such, where a proposal necessitates highway improvements, the developer will be required to meet the cost of the improvements where these are fairly and reasonably related to the development.	policy alone. This policy details that all new development must be accompanied by a transport assessment. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy TP 2: Transport Design and Accessibility	Development proposals will only be permitted provided all of the following criteria are met: 1. The development is accessible to all and permeable by all relevant modes of transport, with priority given to active forms of travel in accordance with Kent County Council's Design Guide. This will include suitable arrangements for access by large vehicles. This will take account of public transport (buses), goods, emergency, and waste collection vehicles for delivery, servicing, and drop-off. The development must also be able to accommodate the swept path of vehicles on proposed new infrastructure. This should include the largest vehicles expected to access the area; and 2. There is public transport service and infrastructure provision within reasonable close proximity; and 3. If located on, or adjacent to, a cycle route, the development will maintain and enhance, or provide a segregated link to (via the development site), the cycle route with reference to the Council's latest Cycling	There are no LSEs of this policy alone. This policy establishes the transport infrastructure requirements for all new developments. It neither provides the quantum or	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be

	Strategy. Maintenance will be delivered through commuted sums to Kent County Council; and 4. Where already in existence, the public rights of way network should be safeguarded. Re-routing of existing public rights of way will be permitted provided that the network is overall enhanced. If there is an opportunity to do so, the development should also consider creating a new public right of way to improve connections to, and/or within, the site, or to enhance the existing local network, including improvements to signage. Where appropriate, financial contributions to improvements to off-site public rights of way will be sought; and 5. Roads within the development are designed and delivered in accordance with the Manual for Streets guidance and, in historically sensitive areas, Historic England's national and regional Streets for All: Advice for Highway and Public Realm Works in Historic Places guidance; and 6. All facilities and services open or provided to the public within the development will be made available for use by persons with disabilities in accordance with Article 9 (accessibility) and 19 (living independently and being included in the community) of the United Nations Convention on the Rights of Persons with Disabilities; and 7. The development incorporates self-enforcing measures into the design that encourages vehicle speed reduction and if appropriate the developer will be required to investigate amending external speed limits adjacent to, and in the vicinity of, the site's access; and 8. Suitable provision is made for car club facilities, car share, and/or cycle share as deemed appropriate; and 9. Suitable provision is made for electric car charging points (or any new technology requirements). The developer must refer to the minimum standards set out in the Local Planning Authority's latest Electric Vehicle Charging Points for New Development Guidance Note for Applicants [(79)]. Shared space schemes, where there is a level surface, will also only be permitted in the following instances: a. Raised junctions, speed tables, speed bumps, and other related traffic calming features; and/or b. Pedestrian crossings; and/or c. Cul-de-sacs servicing 25 properties or less; and/or	location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	screened out 'in-combination'.

	d. Schemes where the contract to construct has already been awarded (or planning/technical design has been approved).		
Policy TP 3: Parking Standards	**Size of parking spaces** Car parking spaces are expected to be provided in accordance with the following sizes: 1. If parking space does not have a wall on any side = 2.6m (width)/5m (length); 2. If parking space has a wall on one side = 2.7m (width)/5m (length); 3. If parking space has a wall on both sides = 2.9m (width)/5m (length). In new residential development at least 15% of all proposed parking spaces must be 3.5m (width)/7.5m (length) in size in order to accommodate light goods vehicles. **Layout and landscaping of parking spaces/areas** All parking will be expected to be delivered on site in a suitable layout. Tandem parking will not be considered acceptable unless it can be demonstrated that the design of the development does not allow for parking on the road/street. Car barns will also only be considered when they are open on three sides and permitted development rights will be removed to prevent subsequent alteration. Additionally, all communal parking facilities must have at least two entry/exit points for pedestrians (to encourage activity and pedestrian movement through these), and must be subject to passive surveillance. Ideally these will be linked to, or located at, the edge of open spaces. It is also essential that new development is not dominated by parking. Proposals must therefore indicate how robust and appropriate soft landscaping will be incorporated into, and around, parking areas. (See Policy EN1: Design and other development management criteria) **Residential parking standards** The residential parking standards detailed within the table below will apply to proposals that are classed under Use Class C3 (dwellings) in accordance with the Council's Residential Parking Standards Topic Paper, unless there are exceptional circumstances, which are listed within the policy.	There are no LSEs of this policy alone. This policy provides for the standard of parking (e.g. number of spaces) within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

When considering whether a room is a 'bedroom', regard will be given to its position within the property, whether there is a window to the room, and whether it can accommodate a single adult bed, which can be accessed through an internally opening door with space for storage of domestic items/clothes, etc., within that room.

	Zone A	Zone B	Zone C
Zone Definition	Royal Tunbridge Wells Town Centre Area	Inside the Limits of Built Development of: Royal Tunbridge Wells (excluding Zone A), Southborough (within Southborough parish), Rusthall (within Rusthall and part of Speldhurst parish), Pembury, Paddock Wood, Cranbrook, and Hawkhurst (Highgate and The Moor)	Everywhere in the borough excluding Zone A and Zone B
Parking Standard Definition	Mandatory	Minimum	Minimum
1 Bed Flat	1	1	1
1 Bed House	1	1	1
2 Bed Flat	1	1	1.5

2 Bed House	1	1	1.5
3 Bed Flat	1	1.5	2
3 Bed House	1.5	1.5	2
4+ Bed Flat	1.5	1.5	2
4+ Bed House	2	2	2.5
Additional Visitor Parking	0.2 per unit	0.2 per unit	0.2 per unit

* Garages will not be counted within parking standards unless they are of a minimum 3.6m (width)/7m (length) in size. If a garage of this minimum size is to be incorporated into the proposal, a condition may be applied that removes permitted development rights for conversion of the garage. Car ports, car barns, and communal parking courts will also be counted towards the overall parking provision.

Within Zone A (Royal Tunbridge Wells Town Centre Parking Area, as defined on the Royal Tunbridge Wells draft Policies Map), proposals shall deliver mandatory parking provision per residential unit. Within Zones B and C, as defined in the table above, developers will be required to provide minimum

parking standards per residential unit. It is expected that all provision of parking space should be delivered on site.

Residents of new residential developments that are within a Controlled Parking Zone will not be eligible for parking permits. Traffic Regulation Orders will therefore be amended so that new residential developments are excluded from Controlled Parking Zones. It is expected that the cost of advertising and administering any change to the Traffic Regulation Order in association with this will be met by the developer. This will also apply to suitable areas deemed eligible for car club development, including new significant developments, within any Zone, that would benefit from a 'Community Car Club'. The developer of these proposals will also be expected to make an appropriate contribution to, or provide at least one parking space and support a car club car for a specified period of time for, the Local Planning Authority's Car Club programme. Developers are advised to refer to the Local Planning Authority's latest Guidance for Developers, Planners and Sustainability on Car Club Set

Up (*add link)* document and Section 106 Planning Obligations Good Practice Guide [(81)]. Equally, the provision of a cycle share/hire scheme may be deemed appropriate and decided on a site by site basis.

Residential Institutions (Use Class C2) will be required to provide parking standards in accordance with the maximum standards outlined within Kent County Council's SPG4 or in later guidance if superseded.

Safe and secure cycle parking provision within all new residential development will be required at the minimum standards outlined within Kent County Council's SPG4 or in later guidance if superseded.

Non-Residential Parking Standards

All proposals for non-residential development within the borough shall apply the maximum parking standards in accordance with the standards outlined within Kent County Council's SPG4 or in later guidance if superseded. These standards are listed in the table below:

Use Class	Maximum Parking Standard per Use Class
A1 Food Retail up to 1,000m²	1 space per 18m²
A1 Food Retail of 1,000m² and over	1 space per 14m²
A1 Non-Food Retail	1 space per 25m²
A2 Use Class	1 space per 20m²
A3 Use Class	1 space per 6m²*
A4 Use Class	1 space per 10m²*
A5 Use Class	1 space per 8m²*
B1 Office Use (up to 500m²)	1 space per 20m²
B1 Office Use (up to 2,500m²)	1 space per 25m²
B1 Office Use (2,500m² and over)	1 space per 30m²
B1 High Tech/Research/Light Industrial	1 space per 35m²
B2 Use Class	1 space per 50m²

B8 Storage and Distribution	1 space per 110m²
B8 Wholesale Trade	1 space per 35m²
C1 Hotels	1 space per bedroom*

* These use classes are also required to deliver one space per two staff in addition to the standard set out above.

All floorspace references in this table refer to gross external floorspace.

The parking standards, parking space design and dimensions, and guideline walking distances to facilities for persons with impaired mobility for all non-residential development will be in accordance with those outlined within Kent County Council's SPG4 or in later guidance if superseded.

Safe and secure cycle parking provision within all new non-residential development will also be required at the minimum standards outlined within Kent County Council' s SPG4 or in later guidance if superseded.

Contributions/provision towards car club and/or cycle share/hire may be deemed appropriate and decided on a site by site basis.

Exceptional circumstances

In exceptional circumstances, the Local Planning Authority may require proposals to depart from the parking standards of both residential and non-residential developments if any of the following apply:

1. A bespoke parking standard is included as part of a site-specific allocation policy in this Local Plan, including in those to be determined by a masterplanning approach, or in a made neighbourhood plan that seeks to take into account specific local circumstances in that area. These parking standards will have primacy over the requirements within this policy. In relation to masterplanning this is especially recommended as there is the potential that Paddock Wood (including land in Capel parish) and particularly Tudeley Village could be designed with highly sustainable transport links/permeability/accessibility; and/or

2. Where there is a relevant parking standards policy in a made neighbourhood plan; and/or

	3. Where an operator or potential occupier requires either more or less parking spaces to cater for their specific operational needs, such requirements can be clearly evidenced, and where their presence has wider planning benefits; and/or 4. To ensure the successful restoration, refurbishment, and reuse of listed buildings, or buildings affecting the character of a conservation area; and/or 5. To allow the appropriate reuse of the upper floors of existing buildings in town centres or above shop units, where it can be demonstrated that this reuse will have wider planning benefits; and/or 6. Should independently verified viability evidence demonstrate that achieving the required parking standard would both render the scheme unviable, and that there are overriding planning benefits to justify that the development should proceed; and/or 7. Where approval is obtained from both Kent County Council and the Local Planning Authority for the development of advanced technology vehicle systems (including those that are autonomous) that will provide for transport needs within the community being served, and which may link and contribute to existing or new similar systems servicing other nearby towns, town centres, and transport services. The promoter of such a system must show a compelling justification that the removal or substantial reduction or modification in the need for parking spaces in accordance with the requirements within this policy can be sustained without detriment to the local road network or town centres. Where appropriate, the Local Planning Authority will pursue the use of Controlled Parking Zones (CPZs) to support the wider strategy for the management of on-street parking in accordance with the approach outlined in this policy.		
Policy TP 4: Public Car Parks	The Local Planning Authority will seek to retain public car parks in the borough, as defined on the draft Policies Map. Development will only be permitted on these public car parks provided at least one of the following criteria is met: 1. The proposed development would result in net additional, or no net loss of, public car parking space on site	There are no LSEs of this policy alone. This policy provides for the retention of all	There are no LSEs of this policy 'in-combination' with other plans.

	and will not reduce accessibility. This may be achieved by providing additional storeys and/or underground parking, or if the proposed developed area is exterior to the area of the site that is used for public car parking; or 2. The car park could be relocated elsewhere within close proximity, which would both not result in net loss of car parking places, unless the car parking demand was considered less than that which was provided on the proposed development site, and which would not result in an increase in on-street car parking or have any significant negative impacts on the traffic within the area; Or 3. The demand for car parking places in the car park being proposed for development is evidenced to be, and with regard to likely future trends, easily accommodated within an existing nearby public car park, which would not result in an increase in on-street car parking or have any significant negative impact on the traffic within the area, or on accessibility to the alternative car park; or 4. The community benefits arising from development on the public car park is considered to be greater than that of the harm caused from the loss of public car parking spaces.	public car parks within TWB. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Policy TP 5: Railways	**Safeguarding Railway Land** Development that is located adjacent to Network Rail's land, assets, and/or operational railway infrastructure will not be permitted if the development will have a negative impact on the safe and continuous operation of the associated railway service(s) in accordance with Network Rail's standard guidelines. Land surrounding railway stations that are suitable for development for the purpose of commuter car and/or cycle parking, bus interchanges, or station facilities, will be safeguarded to make way for potential future provision, expansion, and/or proposals promoted by National Rail policies, by Network Rail, by train operators, or by the Local Planning Authority. **Tunbridge Wells Central to Eridge Railway Line** The Local Planning Authority will safeguard the Tunbridge Wells Central to Eridge railway line, as defined on the draft Policies Map, by refusing proposals that would compromise the re-opening of the rail line and/or its use as a green infrastructure corridor.	There are no LSEs of this policy alone. This policy details plans regarding the safeguarding of railway land. It neither provides the quantum or location of new development. Therefore, there are no impact pathways	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.

	The Former Paddock Wood to Hawkhurst (Hop Pickers) Line The Local Planning Authority will also safeguard the Paddock Wood to Hawkhurst former railway line, as defined on the draft Policies Map, by refusing proposals that would compromise its use as a green infrastructure corridor.	present and this policy can thus be screened out.	
Policy TP6: Safeguarding Roads	1. The three locations detailed below, as defined on the draft Policies Map, are safeguarded for the widening, alteration, improvement, or dualling of existing roads, or the provision of new roads. 2. The Local Planning Authority will refuse proposals for development that would compromise the implementation of either proposed schemes (e.g. the off-line A228), or potential road improvements/widening (e.g. at Halls Hole Road) in these locations. **Land for 'offline' A228 strategic link** Land is safeguarded for the provision of an 'offline' A228 strategic transport link and junctions, as indicated on the draft Policies Map. **A21 Kippings Cross to Lamberhurst Improvements** The Highways Agency proposes to construct an upgrade of the A21 from Kippings Cross to Lamberhurst Bypass, as defined on the draft Policies Map, and the Local Planning Authority will safeguard the preferred alignment by refusing proposals. **Land at Halls Hole Road** This site is safeguarded for future road improvements/widening.	There are no LSEs of this policy alone. This policy details plans regarding the safeguarding of roads. It neither provides the quantum or location of new development. Therefore, there are no impact pathways present and this policy can thus be screened out.	There are no LSEs of this policy 'in-combination' with other plans. There are no impact pathways present and this policy can thus be screened out 'in-combination'.
Open Space, Sport, and Recreation Policies			
Policy OSSR 1: Retention of Open Space	Existing open space, sports, and recreational buildings and land, including playing fields, as defined on the Policies Map, unless allocated for another purpose/use/development in this Local Plan, should be retained and not be built on unless it can be demonstrated that: 1. An assessment has been undertaken that has clearly shown the openspace,buildings, or land to be	There are no LSEs of this policy alone. This is a positive	There are no LSEs of this policy 'in-combination' with other

<table>
<tr>
<td></td>
<td>surplus to requirements in terms of quantity, contribution to local character, and setting, and that there is no need for an appropriate alternative community, sports, or recreational use; or

2. The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

3. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use; or

4. The proposal is a mixed use scheme with demonstrable open space, sports, and recreational provision, and healthy living benefits that mitigate the loss; or

5. In relation to recreational buildings, it can be demonstrated that there is suitable alternative provision on the site, or in the vicinity of the site, or if operated on a commercial basis, the facility is no longer viable and has been marketed for 12 months by appropriate agents for the use, and has been advertised at an appropriate level.</td>
<td>policy detailing the retention of open space for recreational purposes. This could be important in reducing recreational pressure on Ashdown Forest SPA / SAC. It neither provides the quantum or location of new development.

Therefore, there are no impact pathways present and this policy can thus be screened out.</td>
<td>plans.

There are no impact pathways present and this policy can thus be screened out ‘in-combination’.</td>
</tr>
<tr>
<td>Policy OSSR 2: The Provision of Publicly Accessible Open Space and Recreation</td>
<td>1. For new housing or mixed use development sites, the Local Planning Authority will seek to deliver the following categories of publicly accessible open space, sports, and recreation provision in accordance with the specified minimum standards asset out below, and further detailed within the Open Space Supplementary Planning Document:

Eligible types of residential development

<table>
<tr><th>Category</th><th>Open Market housing/flats</th><th>Affordable Housing</th><th>Housing for the active elderly</th><th>Permanent mobile homes</th></tr>
<tr><td>Play Space</td><td>Y</td><td>Y</td><td>Not applicable</td><td>Y</td></tr>
</table>
</td>
<td>There are no LSEs of this policy alone.

This is a positive policy detailing the provision standards (in terms of area and distance) of recreational greenspace for new</td>
<td>There are no LSEs of this policy ‘in-combination’ with other plans.

There are no impact pathways present and this policy can thus be</td>
</tr>
</table>

Outdoor Sports Space	Y	Y	Y	Y
Parks and Gardens	Y	Y	Y	Y
Amenity Open Space	Y	Y	Y	Y
Natural Green Space	Y	Y	Y	Y
Allotments	Y	Y	Y	Y

Requirement for open space, sport and recreation facilities

Type of Provision	1-19 dwellings	20-49 dwellings	50-99 dwellings	100+ dwellings
Allotments	N	N	N	Y
Amenity / Natural Green Space	N	Y	Y	Y
Parks and Recreation Ground	N	N	N	Y
Play Space (Children)	N	N	Y	Y
Play Space (Youth)	N	N	N	Y

Key: Y - on-site provision normally sought, N - improvements to existing (off-site provision normally required

*the minimum size of amenity natural green space considered acceptable as part of new development is 0.15 ha , i.e. for developments that require on-site provision, but which would result in less than 1.15 ha of

development. This could be important in reducing recreational pressure on Ashdown Forest SPA / SAC. It neither provides the quantum or location of new development.

Therefore, there are no impact pathways present and this policy can thus be screened out.

screened out 'in-combination'.

amenity/natural green space against the standard, the minimum size of amenity/natural green space is 0.15 ha.

Open Space Type	Quantity standard for new provision (HA/1000)*	Access standard (radius from open space)**
Amenity Green Space (above 0.15 ha in size) e.g. Areas of informal open space and general recreational areas	0.8	600 metres or 12-13 minutes straight line walk time
Natural Green Space e.g. meadows, woodlands, river valleys, wetlands)	0.8 to include natural and amenity green space for new provision	Accessible Natural Greenspace Standard (ANGST) At least one accessible 20ha site within 2km of home One accessible 100ha site within 5km of home One accessible 500ha site within 10km of home A minimum of 1ha statutory Local Nature Reserve per 1000 population
Park and Recreation Grounds e.g. General recreation grounds which may also include other facilities,	1.1	600 metres or 12-13 minutes straight line walk time

play space, outdoor sports space			
Play Space (Children) e.g. Equipped play areas catering up to the age of around 12	0.04	480 metres or 10 minutes straight line walk time	
Play Space (Youth) e.g. Skateboard parks, basketball courts, hangouts and shelters and Multi use games areas catering for age 13-17	0.04	720 metres or 15 minutes straight line walk time	
Allotments e.g. Land used for growing of own produce – does not include private gardens	0.3	720 metres or 15 minutes straight line walk time	

*/** The Access Standards are set out within Section 6 of the Open Space, Sport and Recreation Study and will be explained fully within the Open Space Supplementary Planning Document.

1. If open space, sports, and recreation provision cannot be provided in full on development sites due to site constraints or location, or other site specific factors, then provision should be provided off site where it is within the distance from the development site identified in the accessibility standard;

2. If other schemes and projects have been identified that would better meet the need for open space provision in the locality as part of new development, contributions may be sought in lieu of applying the access standards where relevant;

3. Exceptionally, a financial contribution in lieu of open space will be acceptable, provided:

    a. The proposed development site would be of insufficient size in itself to make the appropriate new provision; or
    b. The open space cannot be accommodated on site due to site constraints or location, and alternative appropriate off-site provision cannot be identified;

	4. Where it can be demonstrated that existing open space provision can either wholly or partially mitigate the impacts of development in accordance with the above standards, the Local Planning Authority may seek a reduced level of provision or financial contribution. Developers should take full account of open space requirements at an early stage of the development management process, and are encouraged to engage with the Local Planning Authority to determine the most appropriate quantum, type, and location of open space provision; 5. The Local Planning Authority will seek to ensure the provision of the typologies of open space that are most needed in the relevant area, taking account of the above standards and the quality assessment set out in the relevant study, as well as the suitability of the site to accommodate the identified needs; 6. Proposals for, and including, new publicly accessible open space and recreation provision will, where feasible, seek to reinforce existing landscape character, as defined in the Borough Landscape Character Assessment SPD where appropriate; 7. Proposals for, and including, new publicly accessible open space and recreation provision shall respect the amenities of neighbouring occupiers, by ensuring that development does not result in excessive levels of noise or light pollution. 8. Opportunities for formal community use agreements of existing and proposed facilities should be explored to increase existing provision to the general public. The Open Space Supplementary Planning Document will contain further detail on how the policy will be applied and implemented, and quality standards that the Local Planning Authority will have regard to in all new developments and for the improvement of existing provision where relevant.		

Appendix 2: Initial screening process of individual site allocations.

Appendix 2 presents an initial sift of proposed residential and employment site allocations within the Local Plan from the point of view of HRA. All site allocations have been coloured green in the 'HRA implications' column, this indicates that the allocations do not contain potential impact pathways linking to European designated sites and have been screened out from further consideration both alone and 'in-combination'. Individual residential site allocations have been screened out with regards to recreational pressure because they are located more than 7km from Ashdown Forest SAC and SPA. Individual residential and employment site allocations have been screened out with regards to air pollution because they are located more than 200m from a European designated site.

Site Ref	Settlement/ Site Allocation name	No of Residential Units	Amount of Employment Space	Distance from Internationally Designated Sites	HRA Implications
Royal Tunbridge Wells Area Policies AL/RTW Residential and Employment Site Allocations.					
AL/RTW 1	Former Cinema Site, Mount Pleasant Road	100	Not Specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 2	Land at the Auction House, Linden Park Road	None	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 3	Land at Lifestyle Ford, Mount Ephraim, Culverden Street, Rock Villa Road	100	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different

					areas.
AL/RTW 4	Land at 36-46 St. John's Road	65-90	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 5	Land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road	100	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 6	Land at 202 and 230 Upper Grosvenor Road	40-45	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 7	Land at former Gas Works, Sandhurst Road	170-200	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 8	Site AdTN2 Centre and adjacent land, Greggs Wood Road, Sherwood	None	None	More than 10km away from Ashdown Forest	No HRA implications. Due to the relatively long

				SPA/SAC.	distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 9	Land at Beechwood Sacred Heart School	69	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 10	Montacute Gardens	30	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 11	Former Plant & Tool Hire, Eridge Road	45	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 12	Land at Tunbridge Wells Telephone Engineering Centre, Broadwater Down	50	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall

					strategic policies for the different areas.
AL/RTW 13	Turners Pie Factory, Broadwater Lane	100	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 14	Land at Wyevale Garden Centre, Eridge Road	25-30	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 15	Land at Showfields Road and Rowan Tree Road,	155	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 16	Land to the west of Eridge Road at Spratsbrook Farm	120	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 17	Land adjacent to Longfield Road	None	80,000 m^2	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little

					employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 18	Land at the former North Farm landfill site, North Farm Lane and land at North Farm Lane, North Farm Industrial Estate	None	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 19	Land to the north of Hawkenbury Recreation Ground	None	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 20	Land at Culverden Stadium, Culverden Down	30	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/RTW 21	Land at Colebrook Sports Field, Liptraps Lane	80	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

AL/RTW 22	Land at Bayham Sports Field West	20-25	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Southborough Area Policies AL/SO Residential and Employment Site Allocations					
AL/SO 1	Speldhurst Road former allotments (land between Bright Ridge and Speldhurst Road)	16	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/SO 2	Land at Mabledon House	Not specified	A luxury hotel up to a maximum of 200 rooms	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Policy AL/SO 3	Land at Baldwins Lane, North Farm Road	26	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

Paddock Wood Area Policies AL/PW Residential and Employment Site Allocations					
AL/PW 1	Land at Mascalls Farm	412	None	More than 20km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Cranbrook and Sissinghurst Area Policies AL/CRS Residential and Employment Site Allocations					
AL/CRS 1	Land at Brick Kiln Farm, Cranbrook	180	None	More than 25km away from Ashdown Forest SPA/SAC.	Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 2	Land south of Corn Hall, Crane Valley, Cranbrook	35-45	None	More than 25km away from Ashdown Forest SPA/SAC.	Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 3	Turnden Farm, Hartley Road, Cranbrook	160-170 (124-134 net new housing)	Not specified	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 4	Cranbrook School	None	Not specified	More than 25km away	No HRA implications.

				from Ashdown Forest SPA/SAC.	Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 5	Sissinghurst Castle Garden	None	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 6	Land south of The Street, Sissinghurst	20	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/CRS 7	Land at corner of Frittenden Road and Common Road, Sissinghurst	15-20	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Hawkhurst Area Policies AL/HA Residential and Employment Site Allocations					
AL/HA 1	Land at the White House, Highgate Hill	43	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there

					are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HA 2	Brook House, Cranbrook Road	25	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HA 3	Former site of Springfield Nurseries, Cranbrook Road, Hawkhurst	24	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HA 4	Land off Copthall Avenue and Highgate Hill	70-79	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and relatively little additional housing involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HA 5	King George V Playing Fields, The Moor	None	Not specified	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

AL/HA 6	Hawkhurst Station Business Park	None	Not specified	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HA 7	Site at Limes Grove	None	Not specified	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Benenden Area Policies AL/BE Residential and Employment Site Allocations					
AL/BE 1	Land adjacent to New Pond Road (known as Uphill)	18-20	None	More than 30km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/BE 2	Feoffee Cottages and land, Walkhurst Road	23-25	None	More than 30km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/BE 3	Land at Benenden Hospital (south of Goddards Green Road), East End	22-25	None	More than 30km away from Ashdown Forest	No HRA implications. Due to the relatively long

				SPA/SAC.	distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/BE 4	Land at Benenden Hospital,North of Goddards Green Road, East End	22-25	None	More than 30km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Brenchley and Matfield Area Policies AL/BM Residential and Employment Site Allocations					
AL/BM 1	Land between Brenchley Road, Coppers Lane, and Maidstone Road	30-45	None	More than 15km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/BM 2	Land at Maidstone Road	11-15	None	More than 15km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

Frittenden Area Policies AL/FR **Residential and Employment Site Allocations**					
AL/FR 1	Land at Cranbrook Road, Frittenden	25-30	None	More than 32km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Goudhurst Area Policies AL/GO **Residential and Employment Site Allocations**					
AL/GO 1	Land east of Balcombes Hill and adjacent to Tiddymotts Lane	14	None	More than 20km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/GO 2	Land at Triggs Farm, Cranbrook Road	12 (11 net new homes)	None	More than 20km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Horsmonden Area Policies AL/HO **Residential and Employment Site Allocations**					
AL/HO 1	Land adjacent to Furnace Lane and Gibbett Lane	45-55	None	More than 20km away from Ashdown Forest	No HRA implications. Due to the relatively long

				SPA/SAC.	distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HO 2	Land south of Brenchley Road and west of Fromandez Drive	80-100	None	More than 20km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/HO 3	Land to the east of Horsmonden	115-165	None	More than 20km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Lamberhurst Area Policies AL/LA Residential and Employment Site Allocations					
AL/LA 1	Land to the west of Spray Hill	25-30	None	More than 15km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

Pembury Area Policies AL/PE **Residential and Employment Site Allocations**					
AL/PE 1	Land rear of High Street and west of Chalket Lane	50-60	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 2	Land at Hubbles Farm and south of Hastings Road	80	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 3	Land north of the A21, south and west of Hastings Road	80	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 4	Land at Downingbury Farm, Maidstone Road	25	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

AL/PE 5	Land at Sturgeons fronting Henwood Green Road	19	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 6	Woodsgate Corner, Pemsbury	80 units of extra care accommodation or up to 120 units of residential home/nursing care	Not specified	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 7	Land at Cornford Court, Cornford Lane	None	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/PE 8	Owlsnest, Tonbridge Road	76 bedspace care home	None	More than 10km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Rusthall Area Policies AL/RU 1 Residential and Employment Site Allocations					
AL/RU 1	Lifestyle Motor Europe, Langton Road	15	None	More than 7km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little

					employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Sandhurst Area Policies AL/SA **Residential and Employment Site Allocations**					
AL/SA 1	Land on the south side of Sayville, Rye Road and west of Marsh Quarter Lane	10-15	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
AL/SA 2	Sharps Hill Farm, Queen Street	10-15	None	More than 25km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.
Speldhurst Area Policies AL/SP **Residential and Employment Site Allocations**					
AL/SP 1	Land to the west of Langton Road and south of Ferbies	10-12	None	More than 7km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to the relatively long distances and few units / little employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different

					areas.
AL/SP 2	Land at and adjacent to Rusthall recreation ground, Southwood Road	None	None	More than 7km away from Ashdown Forest SPA/SAC.	No HRA implications. Due to no additional housing or employment space involved, there are no impact pathways present. We have 'screened in' the overall strategic policies for the different areas.

Appendix 3: Ashdown Forest Air Quality Impact Assessment as relevant to the Borough of Tunbridge Wells Local Plan.

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Tunbridge Wells Local Plan Appendix 3: Ashdown Forest Air Quality Impact Assessment 2020

Traffic-Related Effects on Ashdown Forest SAC

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The methodology adopted and the sources of information used by AECOM in providing its services are outlined in this Report. The work described in this Report was undertaken between November and December 2020 and is based on the conditions encountered and the information available during the said period of time. The scope of this Report and the services are accordingly factually limited by these circumstances.

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Contents

1 Introduction

1.1.1 Ashdown Forest is an extensive area of common land lying between East Grinstead and Crowborough entirely within Wealden District. The soils are derived from the predominantly sandy Hastings Beds. It is one of the largest single continuous blocks of heath, semi-natural woodland and valley bog in south-east England, and it supports several uncommon plants, a rich invertebrate fauna, and important populations of heath and woodland birds. It is both a Special Area of Conservation (SAC) and Special Protection Area (SPA)

1.1.2 The SPA is designated for its populations of breeding Dartford Warbler *Sylvia undata* and Nightjar *Caprimulgus europaeus*. The SAC is designated for its Annex I habitats, namely Northern Atlantic wet heaths with *Erica tetralix* and European dry heaths; as well as for its Annex II species, namely Great Crested Newts.

1.1.3 Exhaust emissions from vehicles are capable of adversely affecting the protected heathland found in Ashdown Forest. Accordingly, in September 2017 AECOM undertook an air quality impact assessment for Lewes District Council and South Downs National Park Authority, which modelled forecast traffic growth on key roads within 200m of Ashdown Forest SAC over the period 2017 to 2033, including that expected due to the quantum and distribution of growth in the adopted Lewes Joint Core Strategy (as it relates to Lewes District outside the South Downs National Park) and the South Downs Local Plan. Tunbridge Wells Borough Council subsequently commissioned AECOM to use the same traffic and air quality models to undertake an analysis for the emerging Tunbridge Wells Local Plan. Sevenoaks District Council also commissioned an analysis.

1.1.4 Since that time, several methodological elements from the original assessments have changed (such as the release of a new version of the Emission Factor Toolkit and Air Quality Consultants CREAM tool for forecasting ammonia emissions from traffic). As such, the assessment exercise for Tunbridge Wells Local Plan has been comprehensively updated. The methodology used in this analysis is compliant with the requirement of the Conservation of Habitats and Species Regulations 2017 (as amended) to consider whether an adverse effect on the integrity of a European site will result either alone, or in combination with other plans and projects.

1.1.5 In addition to determining the total cumulative 'in combination' effect on roadside air quality at Ashdown Forest SAC, the calculations presented in this analysis also consider the contribution of Tunbridge Wells Local Plan to that 'in combination' effect. This is necessary to determine whether the contribution is ecologically material and thus whether mitigation of that contribution is required.

2 Methodology

2.1.1 Vehicle exhaust emissions generally only have a local effect within a narrow band along the roadside, within 200m of the centreline of the road. Beyond 200m emissions are considered to have dispersed sufficiently that atmospheric concentrations are essentially background levels. Within 200m, the rate of decline is steeply curved rather than linear. In other words, concentrations will decline rapidly as one begins to move away from the roadside, slackening to a more gradual decline over the rest of the distance up to 200m. This means that the impacts are always worse at the side of key roads, so by focussing there a worst-case assessment is undertaken using long road lengths (800m to 4,000m).

2.1.2 Traffic on every road will make a very small contribution to the 'background' air pollution across a large geographic area, as well as its much greater contribution to changes in roadside air quality. AECOM have represented this background component through the use of background pollutant maps in line with Defra guidance. However, these emissions can disperse hundreds of kilometres from the source. As such, the incremental contribution that all vehicles make to background NOx and nitrogen deposition is properly considered at the national and international scale and is being addressed through national and international initiatives such as improved emissions technology and the government's Clean Air Strategy. AECOM takes the view that the purpose of a plan-level HRA is to determine whether there is a significantly elevated local effect which therefore needs addressing at the local level above and beyond the national/international measures that are being implemented.

2.1.3 There are two measures of particular relevance regarding air quality impacts from vehicle exhausts and which are modelled using standard forecasting. The first is the concentration of oxides of nitrogen (known as NOx) in the atmosphere. At high concentrations NOx can be directly toxic to vegetation[1] but its main importance is as a source of nitrogen, which is then deposited on adjacent habitats[2]. The guideline atmospheric concentration advocated by Government for the protection of vegetation is 30 micrograms per cubic metre (μgm^{-3}), known as the Critical Level, as this concentration relates to the growth effects of nitrogen derived from NOx on vegetation. There is also a 24hr critical level available but the Centre for Ecology & Hydrology among others have noted that the '*UN/ECE Working Group on Effects strongly recommended the use of the annual mean value, as the long-term effects of NOx are thought to be more significant than the short-term effects*'[3] and Natural England have previously advised that the annual mean should be used.

2.1.4 The second important metric is a measure of the rate of the resulting nitrogen deposition. The addition of nitrogen is a form of fertilization, which can have a negative effect on heathland and other habitats over time by encouraging more competitive plant species that can force out the less competitive species that are more characteristic. Unlike NOx in atmosphere, the nitrogen deposition rate below which we are confident effects would not arise is different for each habitat. The rate (known as the Critical Load) is provided on the UK Air Pollution Information System (APIS) website (www.apis.ac.uk) and is expressed as a quantity (kilograms) of nitrogen over a given area (hectare) per year ($kgNha^{-1}yr^{-1}$).

2.1.5 A third pollutant included in this assessment is ammonia emissions from traffic as recent evidence indicates that vehicles can contribute significantly to ammonia at a very local scale (i.e. very close to the road), although on a larger scale agriculture is a much more significant source of ammonia than traffic. In ecological terms ammonia differs from NOx in that it is not only a

[1] APIS identifies that negative effects of NO_2 in atmosphere (as distinct from its role in nitrogen deposition) are most likely to arise in the presence of equivalent concentrations of sulphur dioxide (SO_2). Vehicle exhausts do not emit SO_2 and APIS indicates that background SO_2 concentrations at the SAC are very low (a maximum of 1 μgm^{-3}) compared to critical levels for SO_2 of 10-20 μgm^{-3}. Since the SO_2 concentrations are so low no synergistic effect with NOx is expected.

[2] For example, the APIS website states that *'It is likely that the strongest effect of emissions of nitrogen oxides across the UK is through their contribution to total nitrogen deposition…'*
http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm

[3] Sutton MA, Howard CM, Erisman JW, Billen G, Bleeker A, Grennfelt P, van Grinsven H, Grizzetti B. 2013. The European Nitrogen Assessment: Sources, Effects and Policy Perspectives. Page 414. Cambridge University Press. 664pp. ISBN-10: 1107006120
June 2011. Manual on Methodologies and Criteria for Modelling and Mapping Critical Loads & Levels and Air Pollution Effects, Risks and Trends. Chapter 3: Mapping Critical Levels for Vegetation

source of nitrogen but can also be directly toxic to vegetation even in very low concentrations. Using the process set out in Design Manual for Roads and Bridges, ammonia emissions for traffic are not normally calculated. However, for completeness, they have been included in this iteration of AECOM's modelling, both in terms of atmospheric concentrations and as a source of nitrogen. To include ammonia emissions from traffic the CREAM tool produced by Air Quality Consultants Ltd has been used.

2.1.6 Finally, and for completeness, rates of acid deposition have also been calculated. Acid deposition derives from both sulphur and nitrogen. It is expressed in terms of kiloequivalents (keq) per hectare per year. The thresholds against which acid deposition is assessed are referred to as the Critical Load Function. The principle is similar to that for a nitrogen deposition Critical Load, but it is calculated very differently.

2.2 Traffic modelling

2.2.1 Two road links within 200m of Ashdown Forest Special Area of Conservation (SAC) were identified for investigation: the A26 and the A275. These links were chosen as they are representative points on the roads through the SAC likely to experience an increase in flows as a result of growth in Tunbridge Wells Borough.

2.2.2 Traffic data were generated for each of these links for three scenarios, described in this report as:

- Base Case
- Do Nothing (DN)
- Do Something (DS)

2.2.3 The Base Case uses measured flows, percentage Heavy Duty Vehicles (HDVs) and average vehicle speeds on the relevant links, either as provided by Wealden District Council (WDC) (for the A275) or based on measured flows from Department for Transport traffic counts (for the A26). The Wealden traffic counts for the A275 were for 2014 (either undertaken in that year or adjusted to that year). For the purposes of consistency with previous Tunbridge Wells Local Plan modelling exercises, which used a base year of 2017 these data were 'grown' by AECOM transport planners to 2017. The DfT counts for the A26 are from 2018 but it is considered that little difference in flows is likely to have occurred between 2017 and 2018 so 2018 counts are used as a proxy for the 2017 base year.

2.2.4 The Do Nothing scenario is the term used in this report to describe the future flows on the same roads at the end of the Tunbridge Wells Local Plan period (2038), without consideration of the role of the Tunbridge Wells Local Plan. This therefore presents the expected contribution of other plans and projects to flows by 2038. The end of the Local Plan period has been selected for the future scenario as this is the point at which the total emissions due to Tunbridge Wells Local Plan will be at their greatest. The scenario is calculated by extrapolating the observed traffic data. The Do Nothing scenario adds all traffic growth expected by 2038 that will result in additional journeys on the modelled road links.

2.2.5 For the purposes of 'in combination' assessment (i.e. incorporating growth into the model due to multiple Local Plans and Core Strategies for surrounding authorities) it was decided that modelling the adopted Local Plans directly would not reflect actual housing growth in those authorities by 2038 because:

1. They include a large number of allocations that are historic (i.e. already delivered and occupied) and these are already part of the measured base flows.
2. Adopted plans for these authorities may not accurately reflect growth to 2038 because all the adopted plans for the boroughs/districts immediately around Ashdown Forest SAC finish considerably before that year. This means that there will be several years of growth which is not covered by most adopted plans.

2.2.6 Expected development in these authorities over the period to 2038 was therefore included in the model by using the National Trip End Model Presentation Program (TEMPRO). TEMPRO produces a growth factor that is applied to the measured flows. It is based on data for each local authority district in the UK (distributed by statistical Middle Layer Super Output Area[4]) regarding

[4] Middle Layer Super Output Areas are a geographical hierarchy designed to improve the reporting of small area statistics in England and Wales. They are a series of areas each of which has a minimum population of 5,000 residents. They have a mean population of 7,200 residents.

future changes in population, households, workforce and employment (in addition to data such as car ownership) but is not limited to a given period of time. Traffic growth factors are utilised for the statistical Middle Layer Super Output Areas (MSOAs) within which the modelled links are located. TEMPRO has the advantages of being forecastable to 2038 and beyond, using growth assumptions that are regularly updated and distributed to the level of Middle-Layer Super Output Area (of which there are 21 in Wealden District alone) and of being an industry standard database tool across England meaning that modelling exercises that use TEMPRO will have a high degree of consistency.

2.2.7 The other authorities immediately surrounding Ashdown Forest are those in which development is most likely to influence annual average daily traffic flows through the SAC. For those authorities (notably Sevenoaks, Tunbridge Wells, Rother, South Downs National Park, Lewes, Wealden, Mid-Sussex and Tandridge) scrutiny of the relevant adopted Local Plans or Core Strategies and the associated housing growth rates in TEMPRO resulted in the conclusion that the adopted plans (and TEMPRO) currently underestimate growth to 2038 and this could in turn materially affect the estimation of 2038 AADT flows on the relevant roads. The decision was therefore made to raise the growth allowances for these authorities to reflect their most recent Objectively Assessed Need (OAN) at time of traffic modelling. The OAN figure was derived from published information released by the Councils themselves or (in the case of Mid-Sussex) by their Local Plan inspector. Although housing growth rates were adjusted upwards, expected broad housing distributions were not altered. Employment growth assumptions in TEMPRO for these authorities were not adjusted. The authorities and their quanta and broad distributions of housing growth as considered in our analysis are as follows:

- Sevenoaks = 698 dwellings per annum
- Rother = 483 dwellings per annum
- Wealden = 949 dwellings per annum
- Tandridge = 645 dwellings per annum
- Mid Sussex = 1,026 dwellings per annum
- SDNP within Lewes District = 78 per annum
- Lewes District outside SDNP = 291 per annum

2.2.8 For all these authorities the forecast delivery of dwellings (per annum) was multiplied by 21 to reflect the period between 2017 (base year) and 2038 (assessment year).

2.2.9 The Do Nothing (and thus Do Something) Scenario is therefore intentionally precautionary and allows for growth over the period to 2038 beyond that in adopted Local Plans in those authorities immediately surrounding Ashdown Forest SAC.

2.2.10 TEMPRO provides a consistent and standard approach to traffic forecasting when a large number of sources (e.g. local authority areas) are involved. However, a more nuanced forecast can be obtained by creating a bespoke model that manually distributes trips according to journey to work data. This approach provides a better understanding of where traffic associated with the proposed Local Plan development is likely to be most concentrated.

2.2.11 Whereas other authorities were captured using TEMPRO, Tunbridge Wells growth was modelled in more detail using site allocations and quanta provided by Tunbridge Wells Borough Council for their Local Plan, as well as an allowance for windfall, distributed based upon historic growth patterns in the borough. Account was also taken of the stock of consented but, as of 1st April 2020, unbuilt developments in the borough. The modelling for 2038 is therefore based on delivery of 13,453 net new dwellings in Tunbridge Wells borough, which exceeds the 12,200 net new dwellings identified in the Local Plan.

2.2.12 The Do Something scenario reflects the role of the Tunbridge Wells Local Plan at 2038, in addition to growth in other authorities. Detailed modelling of Local Plan growth locations undertaken by the AECOM transport planning team was added to the adjusted TEMPRO growth for all other authorities. To build the Local Plan model, housing and employment sites were geographically assigned to 'distribution groups' across Tunbridge Wells Borough using GIS software. The distribution of each of these groups was calculated using Census 2011 journey to work data, and the trips associated with each distribution group then manually assigned across the network. Site allocations were grouped by model area, the trip generation calculations (housing and employment) were then updated, the relevant distribution was applied and growth for Tunbridge Wells already allowed for in TEMPro from 2017 onwards was adjusted to avoid double counting.

2.2.13 The 'in combination' growth scenario is therefore the Do Something flows, as these include existing traffic, all future journeys arising from within Tunbridge Wells Borough due to the Local Plan (from AECOM's model), and future traffic arising from all other authorities (from TEMPRO, adjusted for expected higher growth rates in some authorities). The difference between the Do Something scenario and the Do Nothing scenario illustrates the role of the Tunbridge Wells Local Plan including unimplemented permissions as of April 2020 in changing future flows compared to what would be expected without the Local Plan.

2.3 Air quality calculations

2.3.1 Using these scenarios and information on total traffic flow, average vehicle speeds and percentage Heavy Duty Vehicles (which influence the emissions profile), AECOM air quality specialists calculated expected NOx concentrations, nitrogen deposition rates, ammonia concentrations and acid deposition rates at receptor points along each modelled road link. The predictions for NOx and nitrogen deposition are broadly based on the assessment methodology presented in Design Manual for Roads and Bridges document LA105 but with significant modifications, notably the inclusion of ammonia modelling. The methodology is presented in Appendix B.

2.3.2 Given that the assessment year (2038) is a considerable distance into the future, it is important for the air quality calculations to take account of improvements in background air quality and vehicle emissions that are expected nationally over the plan period. Making an allowance for a realistic improvement in background concentrations and deposition rates is in line with the Institute of Air Quality Management (IAQM) position[5] as well as that of central government[6]. Background nitrogen deposition rates were sourced from the Air Pollution Information System (APIS) website[7]. Although in recent years improvements have not kept pace with predictions, the general long-term trend for NOx has been one of improvement (particularly since 1990) despite an increase in vehicles on the roads[8]. In contrast, there is no forecast improving trend for ammonia concentrations.

2.3.3 Examination of background nitrogen dioxide (NO_2) monitoring sites in the region within which Ashdown Forest is situated show a general reduction since 1991. While some background sites in the region show a more static trend since c.2012 (notably Lullington Heath near Eastbourne) this is likely to partially result from differences in climatic/meteorological conditions from year to year, rather than increases in nearby traffic flows as these latter would not be expected to significantly influence an area relatively remote from significant roads. There has also been a long-term improving national trend for nitrogen deposition, although the rate of improvement has been much lower than for NOx[9]. According to Plantlife, '*There is an overall decreasing trend in the percentage of UK habitats affected by nitrogen deposition, with levels exceeding critical loads dropping from 75% of UK sensitive habitats in 1996, to 62.5% in 2011-2013'*[10]. The trend has also been observed and documented by the European Union and has been recently used by them to develop a tool to monetise the biodiversity benefit of such improvements[11]. These results are the (inter)national manifestation of a trend which can also be discerned locally as is shown for example in the graphs below.

[5] http://www.iaqm.co.uk/text/position_statements/vehicle_NOx_emission_factors.pdf

[6] For example, The UK Government's recent national Air Quality Plan also shows expected improvements over the relevant time period (up to 2030) https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017

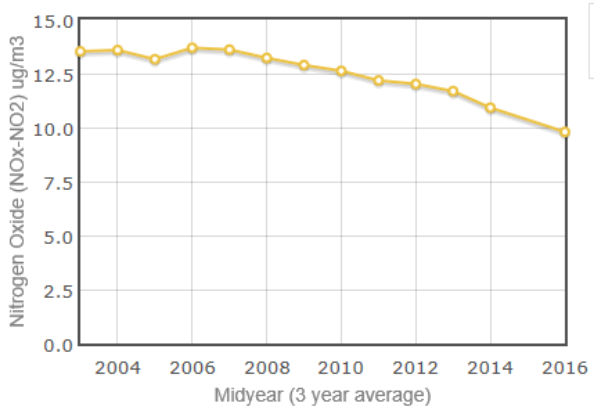
[7] Air Pollution Information System (APIS) www.apis.ac.uk

[8] Emissions of nitrogen oxides fell by 72% between 1970 and 2017. Source: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/778483/Emissions_of_air_pollutants_1990_2017.pdf [accessed 24/04/19]

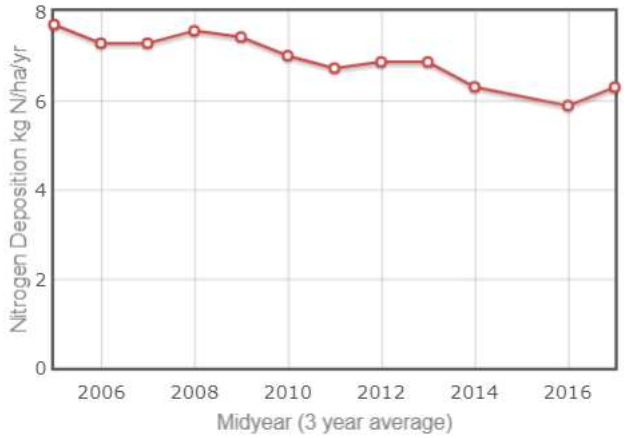
[9] Total nitrogen deposition (i.e. taking account of both reduced and oxidised nitrogen, ammonia and NOx) decreased by 13% between 1988 and 2010. This is an improvement of 0.59% per annum on average.

[10] https://www.plantlife.org.uk/application/files/1614/9086/5868/We_need_to_talk_Nitrogen_webpdf2.pdf

[11] Jones, L., Milne, A., Hall, J., Mills, G., Provins, A. and Christie, M. (2018). Valuing Improvements in Biodiversity Due to Controls on Atmospheric Nitrogen Pollution. Ecological Economics, 152: 358-366. http://ec.europa.eu/environment/integration/research/newsalert/pdf/monetising_biodiversity_benefit_of_reducing_nitrogen_pollution_in_air_522na2_en.pdf



Graph of the trend in average NOx concentrations for the 1km grid square within which Ashdown Forest SAC is situated, from 2003 to 2016 as presented on www.apis.ac.uk. According to APIS background NOx concentrations at the SAC reduced by 3.7 μgm^{-3} over this 13-year period, notwithstanding traffic growth over that same period.



Graph of the trend in oxidised nitrogen deposition to short vegetation (as opposed to forest) for the 5km grid square within which Ashdown Forest SAC is situated from 2005 to 2017 as presented on www.apis.ac.uk. According to APIS oxidised nitrogen deposition at the SAC reduced by 2kgN/ha/yr over this 12-year period, notwithstanding traffic growth over that same period. Total nitrogen deposition (i.e. oxidised nitrogen from NOx and reduced nitrogen from ammonia) remained stable within the same 5km grid square, but this is likely to be mainly as a result of non-road sources of nitrogen within the wider area, principally livestock and fertiliser. The effects of improving vehicle emissions are felt most strongly close to the road and the trend in total nitrogen is close to the road is thus more likely to reflect the improving trend in oxidised nitrogen across the grid square rather than the more static trend for total nitrogen.

2.3.4 The reductions in NOx and nitrogen deposition occurred notwithstanding increased traffic growth over the same time period and is most likely attributable to improvements in emissions technology in the vehicle fleet (i.e. motorists replacing more polluting vehicles associated with earlier Euro standards with less polluting vehicles associated with more recent Euro standards). This improving trend can be expected to continue, and indeed steepen, as drivers continue to replace older cars with newer vehicles and as further improvements in vehicle emissions technology are introduced. For example, the latest (Euro6/VI) emissions standard only became mandatory in 2014 (for heavy duty vehicles) and 2015 (for cars) and the effects are not therefore visible in the data available from APIS because relatively few people will have been driving vehicles compliant with that standard as early as 2016/17. In contrast, far more drivers can be expected to be using Euro 6 compliant vehicles by 2036 since vehicles that are not compliant with Euro 6 ceased manufacture in 2015.

2.3.5 Both NOx concentrations and the component of deposition most associated with combustion processes such as traffic (oxidised nitrogen) can be expected to continue to fall over the long time period (20 years) covered by the Local Plan even if there may be short periods where concentrations and deposition rates fluctuate. This is because cleaner vehicles are entering the vehicle fleet and are being tested using more stringent procedures as ultra-low emission vehicles increase in numbers. For NOx the improvement predictions in the Emission Factor Toolkit (v. 10.1) have been used. This is due to research published in 2020 which confirmed that the latest EFT is likely to underestimate improvements in NOx[12]. No improvement in background ammonia has been factored into the assessment. Note that the EFT only forecasts to 2030. Therefore, 2030 emission factors have been used with 2038 traffic data. This is likely to overestimate NOx emissions for the assessment year (by omitting 8 years of expected improvements) and is thus considered highly precautionary.

2.3.6 For nitrogen deposition the assessment allows for an improvement in background nitrogen deposition of 1.4 kgN/ha/yr over the period to 2038. This is based upon work undertaken for the Joint Nature Conservation Committee which has published the results of the Nitrogen Futures project[13]. That project investigated whether a net improvement in nitrogen deposition (including expected development over the same period) was expected to occur to 2030 at a national scale, under a range of scenarios. The report concluded that *'The scenario modelling predicts a*

[12] '*…the balance of evidence suggests that, on average, NOx concentrations are likely to decline more quickly in the future than predicted by the EFT*'. Source: https://www.aqconsultants.co.uk/news/march-2020/defra%E2%80%99s-emission-factor-toolkit-now-matching-measu

[13] https://hub.jncc.gov.uk/assets/04f4896c-7391-47c3-ba02-8278925a99c5

substantial decrease in risk of impacts on sensitive vegetation by 2030, under the most likely future baseline [a scenario called '2030 NAPCP+DA (NECR NOx)'[14]]. *This is estimated to achieve the UK Government's CAS target for England, defined as a 17% decrease in total reactive N deposition onto protected priority sensitive habitats, with a predicted 18.9% decrease* [for England] *from a 2016 base year'*. The report predicted a fall in nitrogen deposition by 2030 under every modelled scenario.

2.3.7 Background nitrogen deposition at Ashdown Forest was specifically discussed in Annex 5 of the report as a case study. The report concluded regarding that SAC that *'The emission reductions predicted between the 2017 and 2030 baseline scenarios cover a range of sectors, including road transport, and so improvements are predicted to occur over the whole site, including the worst-affected roadside locations'*. This was the case under all modelled scenarios. The Ashdown Forest modelling predicted a 1-2 kgN/ha/yr reduction in background nitrogen deposition to low growing vegetation between 2016 and 2030 (i.e. 14 years), depending on scenario. It is therefore considered that a 1.4 kgN/ha/yr allowance over the 21 years between 2017 and 2038 is in line with the Nitrogen Futures work and is suitably precautionary.

2.3.8 Not to make *any* allowance for these improvements would result in increased emissions of oxides of nitrogen and nitrogen dioxide concentration over the plan year period as an increased number of vehicles is expected on the roads. This is not expected to occur as can be seen from previous long-term trends in the UK, which at worst show slowing of improvements over extended periods, not worsening. Historical records (e.g. Defra monitoring trends) show that as increased vehicles enter the fleet that these increases are offset by the improvements in the emissions of the newer vehicles and the removal of older vehicles. To avoid showing a worsening between the current and future situation some improvements need to be considered as applied by AECOM.

2.3.9 In 2018 the Court of Justice of the European Union (CJEU) ruled in cases C-293/17 and C-294/17 (often dubbed the Dutch Nitrogen cases). One aspect of that ruling concerned the extent to which autonomous measures (i.e. improvements in baseline nitrogen deposition that are not attributable to the Local Plan) can be taken into account in appropriate assessment, the CJEU ruled that it *was* legally compliant to take such autonomous measures into account provided the benefits were not 'uncertain' (paras. 130&132). Note that previous case law on the interpretation of the Habitats Directive has clarified that 'certain' does not mean absolute certainty but '*where no reasonable scientific doubt remains*'[15] [emphasis added].

2.3.10 The forecasts for improvements in NOx emission factors, background concentrations and background deposition rates used in this report are considered to have the requisite level of certainty. This is because a) to a large extent they build upon established historic trends in NOx and oxidised nitrogen deposition and b) for total nitrogen deposition they are based on a cautious use of evidenced central government forecasts associated with uptake of technology that has either already been introduced or is widely expected within the professional community to be introduced and effective before 2030, as illustrated in the Nitrogen Futures project:

- When it comes to forecasting the NOx emissions of additional traffic, it would overestimate those emissions to assume that by 2036 the emission factors will be no different to those in 2017; to make such an assumption would be to fail to take account of the expected continued uptake of Euro 6 compliant vehicles between 2017 and 2036 and would assume (putting it simply) that no motorists would replace their cars during the entire plan period. For example, the latest (Euro 6/VI) emissions standard only became mandatory in 2014 (for heavy duty vehicles) and 2015 (for cars) and the effects will not therefore be visible in the data available from APIS because relatively few people will have been driving vehicles compliant with that standard as early as 2017. Far more drivers can be expected to be using Euro 6 compliant vehicles by the end of the Local Plan period (2038).
- The air quality modelling tools available only go to 2030. Therefore, the modelling includes an inherent caution as 2030 NOx emissions factors are taken to be a proxy for 2038, whereas NOx emissions are actually likely to be better in 2038 than in 2030. In addition, the modelling does not allow for the recent Government announcement that the

[14] The research team considered this the most likely scenario to occur by 2030 as it would achieve the legally mandated National Air Pollution Control Programme (NECR) targets. It includes policies that had already been adopted or implemented, plus additional measures which are currently in development. These additional measures are represented by the UK's National Air Pollution Control Programme (NAPCP).

[15] Case C-239/04 Commission v Portugal [2006] ECR 10183, para. 24; Holohan et al vs. An Bord Pleanála (C-461/17), para. 33

ban on sales of new petrol and diesel cars and vans will be brought forward from 2035 to 2030. Indeed, the ban is not accounted for in the modelling at all, since robust forecasts for the effects of the ban do not yet exist.

3 Results

3.1 Traffic modelling

3.1.1 The flows forecast by 2038, and how these differ between Do Nothing (without the Local Plans/JCS) and Do Something (*including* the Tunbridge Wells Local Plan) are presented overleaf. Note that only data for A275 and A26 are presented as traffic modelling indicated that Tunbridge Wells Local Plan would make no contribution (in terms of AADT) to changes in traffic flows on the A22 through the SAC.

Table 1. Traffic flow data used in the air quality modelling

A	B	D	E	F	G	H
Link ID	**Link Description**	**2017 Base AADT**	**2038 DN AADT (traffic growth excluding Tunbridge Wells Local Plan)**	**2038 DS AADT (traffic growth including Tunbridge Wells Local Plan)**	**Difference between 2017 Base and DS (i.e. net traffic growth from 2017 to 2038)**	**Difference between DS and DN (i.e. contribution of Tunbridge Wells Local Plan)**
37	A275 Wych Cross	4,542	5,449	5,547	1,005	98
38	A26 Poundgate	12,264[16]	14,715	15,406	3,142	691

[16] Note that these data have been updated from the previous assessment using 2018 Department for Transport counts for location 78156. The count data for that location indicate that the previous baseline flows used in the assessment were significant overestimates of flows since the 2018 count data was more than 25% lower than the baseline that was assumed (rather than based on counts) for 2017 in previous modelling exercises.

3.1.2 Both links are forecast to experience an increase in traffic flows between 2017 and 2038 when all expected traffic growth sources (including the Tunbridge Wells Local Plan) are taken into account (Column G of Table 1).

3.1.3 It can be seen from Table 2 that, on the A275, housing and employment delivery in Tunbridge Wells Borough is forecast to make little contribution in terms of Annual Average Daily Traffic, essentially because that road through Ashdown Forest SAC does not constitute a meaningful journey to work route for residents of the Borough based on existing census data. The exception is the A26 at Poundgate where the model forecasts that the Tunbridge Wells Local Plan will be responsible for adding approximately 700 AADT to the total flows by 2038. Note that this traffic growth can be expected to occur incrementally over the plan period, matching the housing delivery trajectory.

3.2 Air quality calculations

3.2.1 Natural England advised that the impact assessment should only include those areas which are currently heathland rather than speculate about parts of the SAC that constitute other habitats (particularly woodland) and may or may not be put down to heathland at an unspecified point in the future[17]. In any event, the ability to create heathland adjacent to the A26 is likely to be influenced much more by other factors such as management, soil pH, soil phosphate levels, drainage and the removal of tree trunks and root systems[18]. Therefore, this assessment focusses on effects on the nearest areas of heathland.

Ammonia

3.2.2 Ammonia concentrations in atmosphere are discussed in this section. Ammonia as a source of nitrogen is discussed in the following section on nitrogen deposition.

3.2.3 There are two critical levels for ammonia in atmosphere, which represent the differing sensitivities of lower plants (lichens and mosses) and higher plants (all other vegetation) to the gas. The difference is because higher plants have a protective cuticle which makes them less vulnerable to the gas than lower plants. A judgment must be made over which is more appropriate in a given location. The lower critical level (1 μm^{-3}) is only appropriate to use in an HRA where the affected area within the modelled transect has a high lichen/bryophyte interest that is relevant to the integrity of the SAC habitat. Otherwise the higher critical level (3 μm^{-3}) is more appropriate. If concentrations are forecast to be below the critical level within the relevant part of the SAC, then there is good reason to conclude no adverse effect will arise.

3.2.4 Heathlands can support a diverse terricolous lichen flora provided the sward is sufficiently open for colonisation. All heathland SACs therefore automatically have the lower critical level assigned to them on the UK Air Pollution Information System (www.apis.ac.uk) and APIS makes it clear that this is due to an *a priori* assumption of lichen/bryophyte interest somewhere in the site. However, APIS assigns critical levels to SACs fairly generically rather than basing the decision on location specific data. In practice there are many areas of heathland that do not support a diverse lichen flora, since management is very significant in influencing lichen diversity and abundance and closed dense swards are much less likely to support a terricolous lichen community than more open swards. In such cases the higher critical level of 3 μm^{-3} is a more appropriate reference threshold.

3.2.5 Some parts of Ashdown Forest SAC do support a diverse terricolous heathland lichen assemblage. However, Wealden District Council has produced habitat maps using Earth Observation (satellite imagery and airborne systems) and commissioned site vegetation surveys[19]. None of these data indicate the presence of a significant assemblage of terricolous

[17] Semi-natural woodland is an interest feature of Ashdown Forest SSSI, so it is very unlikely that clear-felling of such habitats would ever take place in order to replace them with heathland

[18] The process of creating, and then resurfacing/maintaining a significant road and buried roadside services (where these are present) or drainage, often results in changes to the underlying geology and hydrological function of the soils at the roadside, including from the importation of atypical fill material during historic road construction. These habitats can be further affected by surface water runoff all year round (depending on local topography) and salt spray from winter gritting. In addition, it is often desirable to retain a belt of permanent forestry adjacent to roads in order to serve as a buffer feature to the heathland and (for the SPA) the disturbance-sensitive bird populations that lie behind it. The area adjacent to the road is the area most affected by nitrogen deposition due to local traffic.

[19] Two interim ecological survey reports have been released so far, the most recent dated May 2016. These are available at http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/Evidence_Base/Planning_Evidence_Base_Habitat_Regulations_Assessment.aspx

heathland lichens adjacent to any of the modelled roads[20] and such an assemblage would not be expected in these areas given the tall dense swards (including a high proportion of gorse, bracken, scrub and trees). This has been verified by site inspections undertaken by AECOM. Even in heathland that is not scrub and bracken encroached, diverse lichen assemblages will generally only occur where the sward is managed to keep it open to control dwarf shrub (i.e. heather) cover. As such, the higher critical level is considered more appropriate for the relevant roadside locations at Ashdown Forest SAC.

3.2.6 Bearing that in mind, the modelling undertaken for the Tunbridge Wells Local Plan indicates that the 3 μm^{-3} critical level for these specific roadside locations is not exceeded and is not forecast to be exceeded (Appendix A).

3.2.7 Nonetheless, for completeness, Table 3 below summarises the ammonia concentration results for both links relevant to Tunbridge Wells (A26 and A275) with reference to whether the lower critical level (1 μm^{-3}) is forecast to be exceeded at the nearest area of heathland based on AECOM modelling.

Table 3. Summary of ammonia results for the nearest areas of heathland to each modelled link, with reference to the 1 μm^{-3} critical level for ammonia

Link/Transect	Nearest area of heathland	Summary of results by reference to the 1 μm^{-3} critical level
Transect 38: A26 at Poundgate	Approximately 40m from the road, although most is more distant. Intervening habitat is woodland.	2038 ammonia concentrations are forecast exceed the 1 μm^{-3} threshold at this distance, being 1.16 μm^{-3}
Transect 37W: A275 at Wych Cross	Extensive areas approximately 5m from the road. Area within 15m of the road unlikely to support terricolous lichens as vegetation is tall, dense and gorse encroached, providing a closed sward.	2038 ammonia concentrations are forecast to exceed the 1 μm^{-3} threshold at this distance, being 1.14 μm^{-3}
Transect 37E: A275 at Wych Cross	Extensive areas approximately 5m from the road. Area within 15m of the road unlikely to support terricolous lichens as vegetation is tall, dense and gorse encroached, providing a closed sward.	2038 ammonia concentrations are forecast to exceed the 1 μm^{-3} threshold at this distance, being 1.24 μm^{-3}

3.2.8 It can be seen that using a reference critical level of 1 μm^{-3} the ability of the nearest areas of heathland to support lichens probably would be affected. However, Appendix A indicates that this would be equally true if no development or traffic growth took place at all to 2038, the habitat in this area is a dense closed sward unsuitable for lichens and the contribution of Tunbridge Wells Local Plan to any increase in ammonia at the closest area of heathland is close to zero (0.01 μm^{-3} at most). Moreover, a modest future reduction in ammonia from agricultural sources would reduce the ammonia levels across the SAC to an acceptable level and Natural England and partners already intend to introduce a Shared Nitrogen Action Plan for the site to address such issues. It can be seen from Appendix A that even at distances relatively remote from the road (200m away) ammonia concentrations are approximately 0.9 μm^{-3}, indicating that approximately 80% of ammonia at the site is background rather than road contribution. This matches source attribution data for the SAC on the UK Air Pollution Information System, which attributes 80% of ammonia within the SAC to livestock and fertiliser use in the surrounding area and 3% to road traffic.

Oxides of Nitrogen

3.2.9 Appendix A shows the annual mean NOx concentrations for the Baseline, Do Nothing scenario and Do Something Scenario. It also shows the 'Projected Baseline'. This is the modelled NOx concentrations in the hypothetical scenario of no traffic growth to 2038 but allowing for improvements in vehicle emissions for the existing traffic and an associated reduction in background nitrogen deposition. It is presented such that the additional NOx emissions due to traffic growth can be visually separated from the reduction in NOx concentrations due to the improving baseline.

[20] Paragraph 3.3.2 of the 2015 interim botanical survey report for Ashdown Forest states that '*Varying amounts of bryophytes and lichens were recorded, with Cladonia present in some areas but not particularly prevalent along transects'.*

3.2.10 Based on background mapping, adjusted for the effect of the road, the air quality calculations provided in Appendix A show that the NOx concentrations are modelled to be well below the 30 µgm^{-3} Critical Level for vegetation at the nearest areas of heathland (as per Table 3) in all scenarios, even allowing for traffic growth.

3.2.11 Moreover, by 2038, NOx concentrations on all modelled links are forecast to experience a net reduction due to changes in vehicle emissions, notwithstanding the projected increase in traffic on the roads (and notwithstanding the fact that the model has frozen improvements in emission factors at 2030), including that attributable to the Tunbridge Wells Local Plan. For example, at the roadside of the A275 the reduction (improvement) is 13.62 µgm^{-3}.

Nitrogen deposition

3.2.12 Since the most ecologically significant role of NOx at the concentrations forecast at the nearest areas of heathland (i.e. below the critical level) is as a source of nitrogen the next step is to consider what effect this may have on nitrogen deposition rates, and this also factors in the role of ammonia as a source of nitrogen.[21] Calculating nitrogen deposition rates rather than relying purely on scrutiny of NOx concentrations has the advantage of being habitat specific (the critical level for NOx is entirely generic; in reality different habitats have varying tolerance to nitrogen)

3.2.13 As with NOx, Appendix A shows the annual mean nitrogen deposition rates for the Baseline, Do Nothing scenario and Do Something Scenario. It also shows the 'Projected Baseline'. This is the modelled nitrogen deposition rates in the hypothetical scenario of no traffic growth to 2038 but allowing for improvements in vehicle emissions for the existing traffic and an associated reduction in background nitrogen deposition. It is presented such that the additional nitrogen deposition due to traffic growth can be visually separated from the reduction in nitrogen deposition due to the improving baseline. When assessing the likely effects of the planned growth in Tunbridge Wells Borough by 2038, it is necessary to consider: i) the additional nitrogen deposition caused by growth in the region (DS - Proj BL); ii) the contribution of Tunbridge Wells growth to the additional nitrogen; and iii) the overall change in annual mean nitrogen deposition rates by 2033, taking into account improvements in vehicle emissions standards as applied to both existing and future traffic (DS - BL).

3.2.14 Although much of Ashdown Forest SAC (including the borders of many roads) is covered with woodland and the habitat is a feature of the SSSI, woodland is not a notified feature of the internationally important wildlife sites. Ashdown Forest SAC is designated for its heathland and it is this habitat on which the birds of Ashdown Forest SPA depend[22]. In order to undertake the nitrogen deposition modelling it is necessary to select an appropriate deposition velocity and background deposition rate. Since heathland is the SAC habitat appropriate deposition velocities for this habitat were used in the modelling since deposition to other habitats (e.g. woodland) is not relevant to the assessment. In late 2018 the CJEU ruled in case C-461/17, dubbed the Holohan case, that it was necessary to consider other habitats besides those for which the site is actually designated:' … *provided that those implications* [for those habitats] *are liable to affect the conservation objectives of the* [European] *site'* (para. 39 and elsewhere). The vegetative characteristics of the permanent woodland are <u>not</u> linked to the ability of the SAC or SPA to achieve their conservation objectives. Therefore, the Holohan case <u>does</u> not require the woodland to be considered in the modelling.

3.2.15 Critical loads are always presented as a range, which for heathland is 10 kgN/ha/yr to 20 kgN/ha/yr[23]. The lowest part of the nitrogen Critical Load range has been used in this assessment as that is the most precautionary stance to take. The baseline for nitrogen deposition to heathland along A26 and A275 is above the Critical Load and has been modelled to be c.17-25 kgN/ha/yr at the closest points to the road, reducing to c.13-15 kgN/ha/yr by 200m from the road. The results relating to the nearest areas of heathland are summarised in Table 4 below.

[21] Acid deposition rates for all transects on all modelled links are expected to improve over the plan period and the contribution of the Tunbridge Wells Local Plan to any retardation of that improvement is effectively zero, in that any contribution is too small to show in the model (i.e. it would affect the third decimal place or beyond, which are never reported in modelling). Acid deposition is therefore not discussed further in this document.

[22] Neither nightjar or woodlark has highly specialised prey requirements, eating a wide range of insects; as such the evidence indicates that both species forage in a wide range of habitats including heathland, plantation, deciduous woodland, rough pasture, arable land and grassland margins; wherever they can obtain a supply of insects (and seeds in the case of woodlark) of sufficient size. For this reason, impact assessments for nightjar and woodlark focus on their nesting habitat, for which they do have very precise requirements.

[23] APIS advises to use the high end of the range with high precipitation and the low end of the range with low precipitation and to use the low end of the range for systems with a low water table, and the high end of the range for systems with a high water table.

Table 4. Total additional nitrogen deposition due to growth 'in combination' at closest area of heathland

Link/Transect	Nearest existing area of heathland	Summary of results 'in combination'
Transect 38: A26 at Poundgate	Small patch approximately 40m from the road, although most is more distant.	0.35 kgN/ha/yr at 40m from the road
Transect 37W: A275 at Wych Cross	Extensive areas approximately 5m from the road.	0.33 kgN/ha/yr at 5m from the road
Transect 37E: A275 at Wych Cross	Extensive areas approximately 5m from the road.	0.42 kgN/ha/yr at 5m from the road

3.2.16 At the closest areas of heathland to the A275 the worst-case additional deposition due to extra traffic is forecast to be c. 0.4 kgN/ha/yr. The contribution of Tunbridge Wells Local Plan to nitrogen deposition at the roadside of the A275 would be a nugatory 0.04 kgN/ha/yr[24], falling to effectively zero by 10m from the road[25]. On the road to which Tunbridge Wells Local Plan will contribute the greatest traffic (the A26) the worst case 'in combination' nitrogen dose at the closest patch of heathland is 0.35 kgN/ha/yr with Tunbridge Wells contributing a similarly nugatory 0.07 kgN/ha/yr.

3.2.17 Moreover, the DS-BL column in Appendix A shows that the deposition from additional traffic (irrespective of source) is forecast to be offset at the nearest areas of heathland by a much larger reduction in background deposition expected over the same timescale. As a result, a net *reduction* in deposition of c. 1.2 kgN/ha/yr is actually forecast at the closest area of heathland notwithstanding traffic growth[26].

Ecological significance

3.2.18 The modelling demonstrates that there will be a net decreasing trend in nitrogen deposition rates to heathland within the SAC along the modelled links. Accordingly, the Local Plans will not have significant in-combination effects on the SAC by way of contributing to any net increase in nitrogen deposition.

3.2.19 However, it is also necessary to consider whether the Local Plans could have a significant effect on the SAC as a result of materially retarding (i.e. slowing) the improvement of nitrogen deposition rates, as the modelling in Appendix A identifies that the forecast improvement in deposition rates to heathland would be approximately 20% lower due to expected traffic growth than in the hypothetical situation of no further traffic growth (compare column DS, which is the forecast 2038 deposition rates including traffic growth, with column 'Proj BL', which is the forecast 2038 deposition rates if there were no traffic growth).

3.2.20 Drawing a conclusion on this matter requires ecological interpretation to determine whether a given retardation of improvement in nitrogen deposition is likely to result in an ecological impact that is sufficiently large in size or great in extent to materially interfere with the ability of the site to achieve its conservation objectives. This involves consideration of the size of the dose as a percentage of the critical load, the extent and location of the affected area, the function of the affected area in enabling the site to meet its conservation objectives, whether the restore objective for the SAC would be compromised and whether other factors are of greater significance than nitrogen deposition in enabling the site to achieve its conservation objectives.

3.2.21 A key factor in drawing conclusions over whether the dose due to traffic growth will affect the ability of the site to meet its conservation objectives and compromise the restore objective is the relative extent of the affected area. The area forecast to exceed 1% of the critical load 'in combination' (i.e. the total area which is subject to an 'in combination' dose greater than imperceptible) totals 3.1ha (0.6ha of heathland along the A26 and 2.5ha of heathland along the A275) amounting to just 0.2% of all heathland in the SAC[27]. Furthermore, even the worst-case

[24] 21% of the modelled difference between Do Something and Do Nothing for this link in Appendix A

[25] Traffic on every road will make a very small contribution to the 'background' air pollution across a large geographic area, as well as its much greater contribution to changes in roadside air quality. However, these emissions can disperse hundreds of kilometres from the source. As such, the incremental contribution that all vehicles make to background NOx and nitrogen deposition is properly considered at the national and international scale and is being addressed through national and international initiatives such as improved emissions technology, the government's Clean Air Strategy etc.

[26] If the actual current roadside deposition rates are substantially higher than that included in the AECOM model, the percentage reduction in nitrogen deposition rate by 2033 would be the same but the actual reduction in deposition rate would be much greater.

[27] According to the Natura 2000 data sheet there are 1,611 ha of heathland in the SAC.

dose forecast to heathland (0.4 kgN/ha/yr) is small[28] and will affect an extremely small proportion of the SAC (c.0.9ha of heathland or 0.06% of the heathland in the SAC). In other words, 99.8% of heathland in the SAC will be entirely unaffected and the remainder will only be subject to a small 'in combination' nitrogen dose. Moreover, the contribution of Tunbridge Wells Local Plan to even that small dose is nugatory (7 milligrams, or approximately 1/700th of a teaspoon, per square metre, per year).

3.2.22 In addition, the very small area of SAC heathland subject to the small 'in combination' dose is not forecast to experience a deterioration in nitrogen deposition but a modest slowing in the rate of air quality improvement (and potential for vegetation recovery) which is likely to have a commensurately small botanical effect. This can be illustrated by reviewing dose-response data.

3.2.23 Deposition of nitrogen can cause a variety of responses in heathland: transition from heather to grass dominance, decline in lichens (such as *Cladionia* species), changes in plant biochemistry and increased sensitivity to stress[29]. The physical, measurable and observable manifestations of these responses are generally in terms of reduction in species richness[30], reduction in cover (or increase in grass cover) and resulting changes in broad habitat structure. These responses are not independent: for example, reduction in species richness can cause, and in turn be exacerbated by, changes in habitat structure. Note that 'reduction in species richness' means that fewer species are recorded in a randomly placed 2m x 2m quadrat. Therefore, it does not mean species are 'lost' from the affected area; it simply means that at least one species occurs at a reduced frequency[31].

3.2.24 Since there is a forecast to be a significant improvement in nitrogen deposition rates in the Do Something scenario, a relevant question is whether there is likely to be a meaningful difference in the potential for vegetation recovery within the affected 0.06% to 0.2% of the SAC between the Projected Baseline and the Do Something scenario. In real terms, would one expect a meaningful ecological difference in potential for vegetation recovery between an improvement in the rate of nitrogen deposition of 1.2 kgN/ha/yr at 5m from the A275 when all traffic growth is included, or one of 1.6 kgN/ha/yr when no traffic growth is included.

3.2.25 Reference to Appendix 5 of Caporn et al (2016) suggests that at background deposition rates of c. 15kgN/ha/yr (the closest deposition rate in the report to that forecast at the closest areas of heathland in this modelling by 2038) the forecast net reduction in nitrogen deposition at the most affected areas of heathland (roughly 2 kgN/ha/yr) could potentially result in an increase in species richness (whether grass species richness, moss species richness or total species richness) of up to c. 3-4% of the maximum in heathland, although it can only be described as the *potential* for recovery since there will be a considerable lag in vegetation responses to reductions in nitrogen deposition. Using a total maximum species richness for heathland of 37 species[32] this suggests that approximately 1-2 more species could eventually be found in the sward on average. Such a reduction in deposition rates could also ultimately result in a reduction in grass (graminoid) cover of c.1%[33] **if** other factors such as management and drainage are suitable.

3.2.26 Appendix 5 of Caporn et al (2016) also suggests that at the same background deposition rate the worst-case additional nitrogen deposition to heathland as a result of 'in combination' traffic growth (c. 0.4 kgN/ha/yr at 5m from the A275 or 40m from the A26) could, if it constituted a net increase in deposition rate, result in a small (c.0.1%) increase in grass (graminoid) cover and a reduction in species richness (whether grasses, mosses or total species richness) at the roadside equivalent to c.0.6% of the maximum (c.0.2 species i.e. if you dropped a random

[28] A 'small' change in atmospheric pollution is generally considered to be a change equivalent to less than 5% of the critical load (i.e. 0.5 kgN/ha/yr for heathland). The maximum dose at the closest area of heathland is 0.4 kgN/ha/yr. This is just above the lowest dose examined in Caporn et al (2016)

[29] Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., Jones, L., Phoenix, G., S Power, S., Sheppard, L. & Stevens, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, Number 210. Table 1 page 2

[30] This is a good indicator of the effect of nitrogen deposition on vegetation as it arises at low background deposition rates, is easily detectable and occurs across different habitats. The main exception appears to be calcareous grassland where there is no correlation between nitrogen deposition and species richness; for that habitat, rather than there being a reduction in the average number of species per quadrat the reduced frequency of less competitive species appears to be offset by the increased frequency of more competitive species.

[31] Caporn et al (2016), page 39

[32] 37 species is the maximum species richness in the lowland heathland sample reported in Caporn et al (2016) and is the reference species richness for lowland heathland used throughout that report.

[33] Appendix 5, Caporn et al (2016)

quadrat there is an approximately 20% probability you would record one less species)[34] The change away from the roadside would be much less..

3.2.27 In terms of changes in coarse habitat structure it is considered that the small forecast additional nitrogen deposition (equivalent to a maximum c. 2% of the deposition rate otherwise forecast in these locations by 2033) would not stimulate growth to such an extent that a material change in management burden occurred, and the structure of the sward is dictated primarily by management.

3.2.28 Bearing in mind that a net reduction in nitrogen deposition rates is actually being forecast, the most that might be expected by 2033 due to traffic growth on roads through the SAC is that one *might* record a reduction in percentage grass cover immediately adjacent to the A275 of 0.9%, as opposed to a potential 1% reduction in the hypothetical case of no traffic growth, and the frequency of occurrence of at least 1 species might be slightly lower in that area than it would be with no growth. Note that these are not intended to be precise predictions but illustrations of the relatively subtle difference in potential for vegetation recovery between two nitrogen doses that are only slightly different; whether any difference would actually be observed in practice would depend heavily on other factors, because management has and differences in drainage have a great influence on parameters such as percentage grass cover and species richness.

3.2.29 In summary:

1. Air quality within 200m of the roadside in 2038 is forecast to be significantly better than in 2017 notwithstanding the precautionary assumptions made about both growth and improvements in vehicle emissions factors;
2. NOx concentrations at heathland within 200m of the A26 and A275 are expected to be below the critical level by 2038;
3. Nitrogen deposition rates and ammonia concentrations will continue to exceed the critical load or level due to existing sources but the potential for vegetation recovery in more than 99% of heathland in the SAC will be unaffected by local traffic growth;
4. The remainder is a narrow roadside belt that may experience a subtle difference with all planned housing and employment growth, consisting primarily of a slight difference in percentage grass cover and species richness, but even here the reduction in nitrogen deposition, and potential for vegetation recovery, will still be approximately 80% of that which would be expected without housing and employment growth;
5. the contribution of Tunbridge Wells Local Plan to the 'in combination' deposition for those nearest areas of heathland is nugatory, being a little above zero. This is relevant since in European Court of Justice Case C-258/11 Advocate-General Sharpston stated at paragraph 48 of her Opinion that: '*the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill';* and
6. Natural England have confirmed that nitrogen deposition from traffic is not preventing the site from achieving its conservation objectives, but rather the principal issue is lack of management. For example, a review of the Natural England condition assessment on a unit by unit basis clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition.

3.2.30 For all these reasons it is considered that the ability of the SAC and SPA to achieve its conservation objectives would not be significantly compromised by Local Plan growth either alone or in combination.

[34] Caporn el al (2016) indicates that not all species respond equally to nitrogen deposition (some are stimulated, others negatively affected). For example, Table 22 of NECR2010 shows that at background rates of 15 kgN/ha/yr one would expect a dose of 1 kgN/ha/yr (three times what is forecast in the AECOM model) to reduce the frequency of occurrence (percentage cover, or probability of presence) of five representative lowland heathland lower plant species (*Hylocomium splendens, Hylocomium splendens, Cladonia portentosa, Cladonia portentosa, Brachythecium rutabulum*) by between 0.2% and 0.5%. However, they also state on page 71 that '*The relatively small datasets mean that caution should be applied when drawing conclusions on site integrity based on the presence or absence of individual species and that this information* [should] *be used in conjunction with changes in species richness and composition'.*

4 Conclusion

4.1.1 There is no basis to conclude an adverse effect on integrity of Ashdown Forest SAC or SPA, and thus the ability of the site to achieve its conservation objectives, from growth in Tunbridge Wells Borough over that period in combination with other plans. Since no adverse effect on integrity is forecast, no mitigation as such would be required.

4.1.2 It should be noted that the assessment undertaken to inform this conclusion was precautionary. For example:

- AECOM has taken a cautious approach to allowing for improvements in background nitrogen deposition over the plan period.
- Rather than simply model the rates of growth set out in adopted or submitted Core Strategies and Local Plans, the AECOM model increased the housing delivery rates for those authorities immediately surrounding Ashdown Forest SAC (Wealden District, Mid-Sussex District and Tandridge District) to allow for additional growth in line with the most-recently expressed Objectively Assessed Need as of June 2017. In some cases (e.g. Mid-Sussex) this substantially increased the amount of housing allowed for over the period to 2033. In practice, therefore, growth around Ashdown Forest SAC may have been over-estimated. For example, the recent Government consultation on Objectively Assessed Need (OAN) proposes a significantly lower OAN for Wealden District than was allowed for in the AECOM model.

4.1.3 It is therefore concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the Tunbridge Wells Local Plan, even in combination with other plans and projects. This is due to a combination of a) an expected net improvement in air quality over the Local Plan period, b) the fact that, whether or not that improvement occurs to the extent forecast, the contribution of the Tunbridge Wells Local Plan to changes in roadside air quality is demonstrably ecologically nugatory due to the very small magnitude and c) the precautionary nature of the modelling.

4.1.4 This conclusion is not intended to suggest that no active attempt should be made to reduce background NOx concentrations and nitrogen deposition around Ashdown Forest as a matter of general good stewardship if that is what the authorities agree, and the authorities already have a forum for collaborative involvement in this issue via the working group that has recently been convened by South Downs National Park Authority.

Appendix A. Detailed Modelling Results

Ammonia Concentrations (red text denotes the closest area of heathland to the road)

	Annual Mean NH_3 (ug/m^3)				Difference		
Distance from road	**2017 Baseline**	**2038 baseline**	**2038 Do Nothing**	**2038 Do Something**	**Change in pollution between 2017 and 2038**	**Dose due to traffic growth 'in combination'**	**Dose due to Tunbridge Wells Local Plan alone**
A26 at Poundgate							
0	2.35	2.73	3.10	3.19	0.84	0.46	0.09
5	1.64	1.83	2.02	2.07	0.43	0.24	0.05
10	1.40	1.53	1.66	1.69	0.29	0.16	0.03
15	1.28	1.37	1.48	1.50	0.22	0.13	0.02
20	1.20	1.28	1.36	1.38	0.18	0.10	0.02
30	1.11	1.16	1.22	1.24	0.13	0.08	0.02
40	1.05	1.10	1.15	1.16	0.11	0.06	0.01
50	1.02	1.06	1.10	1.11	0.09	0.05	0.01
60	1.00	1.03	1.06	1.07	0.07	0.04	0.01
70	0.98	1.00	1.03	1.04	0.06	0.04	0.01
80	0.96	0.99	1.01	1.02	0.06	0.03	0.01
90	0.95	0.97	0.99	1.00	0.05	0.03	0.01
100	0.94	0.96	0.98	0.99	0.05	0.03	0.01
125	0.92	0.94	0.96	0.96	0.04	0.02	0.00
150	0.91	0.92	0.94	0.94	0.03	0.02	0.00
175	0.90	0.91	0.92	0.93	0.03	0.02	0.01
200	0.90	0.91	0.91	0.92	0.02	0.01	0.01
A275 (west side of road)							
0	1.26	1.36	1.46	1.47	0.21	0.11	0.01
5	1.04	1.09	1.14	1.14	0.10	0.05	0.00
10	0.98	1.01	1.04	1.05	0.07	0.04	0.01
15	0.94	0.97	0.99	1.00	0.06	0.03	0.01
20	0.92	0.94	0.96	0.97	0.05	0.03	0.01
30	0.90	0.92	0.93	0.93	0.03	0.01	0.00
40	0.89	0.90	0.91	0.91	0.02	0.01	0.00
50	0.88	0.89	0.90	0.90	0.02	0.01	0.00
60	0.88	0.88	0.89	0.89	0.01	0.01	0.00
70	0.87	0.88	0.89	0.89	0.02	0.01	0.00
80	0.87	0.87	0.88	0.88	0.01	0.01	0.00
90	0.87	0.87	0.88	0.88	0.01	0.01	0.00
100	0.86	0.87	0.87	0.87	0.01	0.00	0.00
125	0.86	0.86	0.87	0.87	0.01	0.01	0.00
150	0.86	0.86	0.87	0.87	0.01	0.01	0.00
175	0.86	0.86	0.86	0.86	0.00	0.00	0.00
200	0.85	0.86	0.86	0.86	0.01	0.00	0.00

	Annual Mean NH_3 (ug/m^3)				Difference		
Distance from road	**2017 Baseline**	**2038 baseline**	**2038 Do Nothing**	**2038 Do Something**	**Change in pollution between 2017 and 2038**	**Dose due to traffic growth 'in combination'**	**Dose due to Tunbridge Wells Local Plan alone**
A275 (East side of road)							
0	1.34	1.47	1.59	1.60	0.26	0.13	0.01
5	1.11	1.17	1.24	1.24	0.13	0.07	0.00
10	1.03	1.07	1.12	1.12	0.09	0.05	0.00
15	0.98	1.02	1.05	1.06	0.08	0.04	0.01
20	0.96	0.99	1.01	1.02	0.06	0.03	0.01
30	0.93	0.95	0.97	0.97	0.04	0.02	0.00
40	0.91	0.93	0.94	0.94	0.03	0.01	0.00
50	0.90	0.91	0.93	0.93	0.03	0.02	0.00
60	0.89	0.90	0.91	0.92	0.03	0.02	0.01
70	0.88	0.89	0.91	0.91	0.03	0.02	0.00
80	0.88	0.89	0.90	0.90	0.02	0.01	0.00
90	0.88	0.88	0.89	0.89	0.01	0.01	0.00
100	0.87	0.88	0.89	0.89	0.02	0.01	0.00
125	0.87	0.87	0.88	0.88	0.01	0.01	0.00
150	0.86	0.87	0.88	0.88	0.02	0.01	0.00
175	0.86	0.87	0.87	0.87	0.01	0.00	0.00
200	0.86	0.86	0.87	0.87	0.01	0.01	0.00

NOx and Nitrogen Deposition (red text denotes the closest area of heathland to the road)

	Total Annual Mean NOx (ug/m^3)				Total Annual Mean N Dep (kg N/ha/yr)				Difference in Nitrogen dose		
	2017 Baseline	2038 Baseline	2038 Do Nothing	2038 Do Something	2018 Baseline	2038 Baseline	2038 Do Nothing	2038 Do Something	Change in pollution between 2017 and 2038	Dose due to traffic growth 'in combination'	Dose due to Tunbridge Wells Local Plan
A26 at Poundgate											
0	63.62	22.22	25.27	26.12	24.90	22.86	25.00	25.55	0.65	2.69	0.55
5	38.24	14.82	16.40	16.84	19.53	17.64	18.76	19.05	-0.48	1.41	0.29
10	29.71	12.36	13.45	13.76	17.68	15.90	16.68	16.88	-0.80	0.98	0.20
15	25.31	11.10	11.94	12.18	16.71	15.01	15.61	15.77	-0.94	0.76	0.16
20	22.54	10.30	10.99	11.18	16.10	14.45	14.94	15.06	-1.04	0.61	0.12
30	19.26	9.37	9.87	10.01	15.38	13.79	14.14	14.23	-1.15	0.44	0.09
40	17.40	8.84	9.23	9.34	14.97	13.41	13.69	13.76	-1.21	0.35	0.07
50	16.16	8.49	8.81	8.90	14.69	13.17	13.40	13.46	-1.23	0.29	0.06
60	15.29	8.24	8.51	8.59	14.50	12.99	13.19	13.23	-1.27	0.24	0.04
70	14.64	8.05	8.29	8.36	14.35	12.86	13.03	13.07	-1.28	0.21	0.04
80	14.13	7.91	8.12	8.17	14.24	12.76	12.91	12.94	-1.30	0.18	0.03
90	13.72	7.79	7.98	8.03	14.14	12.67	12.81	12.84	-1.30	0.17	0.03
100	13.39	7.70	7.86	7.91	14.08	12.60	12.73	12.76	-1.32	0.16	0.03
125	12.77	7.52	7.65	7.69	13.94	12.48	12.58	12.60	-1.34	0.12	0.02
150	12.35	7.40	7.51	7.54	13.84	12.40	12.47	12.49	-1.35	0.09	0.02
175	12.03	7.31	7.40	7.42	13.77	12.33	12.40	12.41	-1.36	0.08	0.01
200	11.80	7.24	7.32	7.34	13.71	12.29	12.33	12.36	-1.35	0.07	0.03
A275 (west of road)											
0	26.59	12.00	12.88	12.97	17.92	16.24	16.85	16.91	-1.01	0.67	0.06
5	18.80	9.68	10.11	10.15	16.21	14.65	14.95	14.98	-1.23	0.33	0.03
10	16.48	9.00	9.29	9.32	15.69	14.19	14.38	14.41	-1.28	0.22	0.03
15	15.31	8.66	8.88	8.90	15.43	13.96	14.10	14.11	-1.32	0.15	0.01
20	14.60	8.45	8.63	8.64	15.28	13.81	13.93	13.94	-1.34	0.13	0.01
30	13.78	8.21	8.34	8.35	15.09	13.64	13.73	13.74	-1.35	0.10	0.01
40	13.33	8.08	8.18	8.19	14.99	13.55	13.62	13.63	-1.36	0.08	0.01
50	13.04	7.99	8.08	8.08	14.92	13.49	13.55	13.56	-1.36	0.07	0.01
60	12.84	7.93	8.01	8.01	14.88	13.45	13.50	13.50	-1.38	0.05	0.00
70	12.69	7.89	7.95	7.96	14.85	13.43	13.47	13.47	-1.38	0.04	0.00
80	12.58	7.86	7.91	7.92	14.82	13.40	13.44	13.45	-1.37	0.05	0.01
90	12.49	7.83	7.88	7.89	14.80	13.38	13.41	13.43	-1.37	0.05	0.02
100	12.42	7.81	7.86	7.86	14.79	13.37	13.40	13.40	-1.39	0.03	0.00
125	12.28	7.77	7.81	7.81	14.76	13.34	13.37	13.37	-1.39	0.03	0.00
150	12.19	7.74	7.78	7.78	14.74	13.33	13.35	13.35	-1.39	0.02	0.00
175	12.13	7.73	7.76	7.76	14.72	13.31	13.34	13.34	-1.38	0.03	0.00
200	12.08	7.71	7.74	7.74	14.71	13.30	13.32	13.32	-1.39	0.02	0.00

	Total Annual Mean NOx (ug/m^3)				Total Annual Mean N Dep (kg N/ha/yr)				Difference in Nitrogen dose		
	2017 Baseline	2038 Baseline	2038 Do Nothing	2038 Do Something	2018 Baseline	2038 Baseline	2038 Do Nothing	2038 Do Something	Change in pollution between 2017 and 2038	Dose due to traffic growth 'in combination'	Dose due to Tunbridge Wells Local Plan
A275 (east of road)											
0	29.58	12.90	13.96	14.07	18.58	16.87	17.59	17.67	-0.91	0.80	0.08
5	21.16	10.39	10.95	11.01	16.73	15.14	15.53	15.57	-1.16	0.43	0.04
10	18.24	9.53	9.92	9.96	16.08	14.55	14.82	14.84	-1.24	0.29	0.02
15	16.72	9.08	9.38	9.41	15.75	14.24	14.45	14.47	-1.28	0.23	0.02
20	15.78	8.80	9.05	9.07	15.54	14.05	14.22	14.24	-1.30	0.19	0.02
30	14.68	8.48	8.66	8.68	15.29	13.83	13.96	13.97	-1.32	0.14	0.01
40	14.06	8.29	8.44	8.45	15.15	13.70	13.80	13.81	-1.34	0.11	0.01
50	13.65	8.17	8.29	8.31	15.06	13.62	13.70	13.71	-1.35	0.09	0.01
60	13.37	8.09	8.19	8.20	15.00	13.56	13.63	13.64	-1.36	0.08	0.01
70	13.16	8.03	8.12	8.13	14.95	13.52	13.58	13.58	-1.37	0.06	0.00
80	13.00	7.98	8.07	8.07	14.92	13.48	13.55	13.55	-1.37	0.07	0.00
90	12.88	7.95	8.02	8.03	14.89	13.46	13.52	13.52	-1.37	0.06	0.00
100	12.77	7.92	7.98	7.99	14.86	13.44	13.49	13.49	-1.37	0.05	0.00
125	12.59	7.86	7.92	7.92	14.83	13.40	13.44	13.45	-1.38	0.05	0.01
150	12.46	7.82	7.87	7.88	14.80	13.38	13.41	13.41	-1.39	0.03	0.00
175	12.36	7.79	7.84	7.84	14.77	13.36	13.39	13.39	-1.38	0.03	0.00
200	12.29	7.77	7.81	7.82	14.76	13.35	13.37	13.37	-1.39	0.02	0.00

Appendix B. Air Quality Modelling Methodology

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Ashdown Forest – Tunbridge Wells

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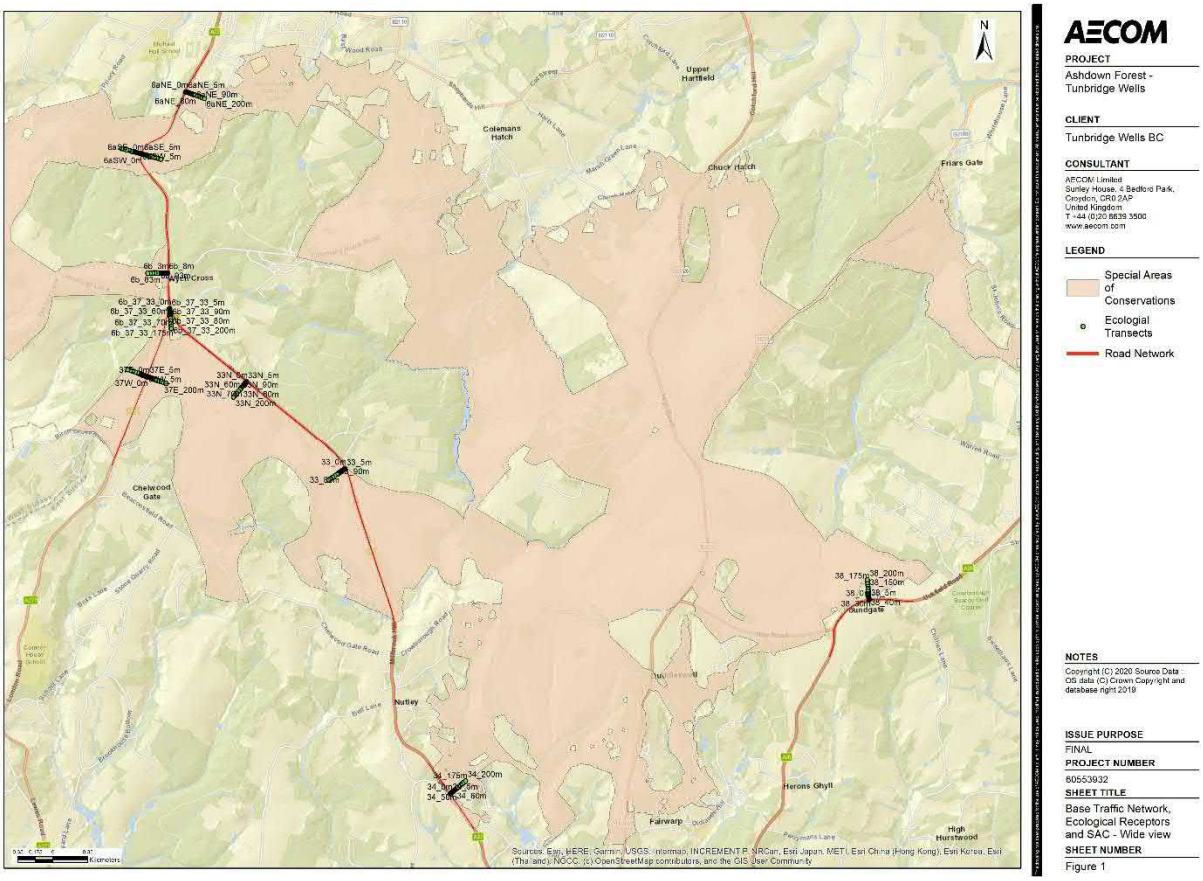
Appendix B – Air Quality Modelling Methodology

Overview

Tunbridge Wells Borough Council have prepared a Local Plan setting out proposed developments up to 2038. This project assesses the impact on air quality of the Local Plan on internationally designated ecological sites that require a Habitats Regulation Assessment (HRA).

Ashdown Forest is located in Wealden district. This project considers the impact of changes in traffic flow on concentrations of nitrogen oxides (NOx), ammonia (NH_3) and nitrogen deposition at the closest ecological receptors, within Ashdown Forest Special Area of Conservation (SAC). Figure 1 shows the traffic network, ecological receptors and SAC considered in this project.

Figure 1 Base Traffic Network, Ecological Receptors and SAC



Methodology

Traffic Data

The road network includes multiple links along the A275 and A26 which run through the Ashdown Forest SAC. Traffic data in the form of 24-hour AADT (Annual Average Daily Traffic) based on 2017 data and forecast to 2038 are shown in Table 1. Baseline traffic data were obtained from Manual Count data for the A26 and through TEMPRO growth (version 7.2b) of 2014 data for the A275.

The Baseline and Future Baseline scenarios (both without Local Plan) used 2017 traffic data. The future year without Local Plan (2038 Do-Something) traffic flows were calculated by applying a growth factor to the 2017 traffic to 2038 traffic flows for the A275 and A26 roads resulting in increases of 908 and 2,451 AADT respectively. The Local Plan is predicted to increase the daily average flows by a further 98 and 691 AADT for A275 and A26 respectively in 2038 compared with the situation without the Local Plan (but with expected traffic growth). No increase on the A22 arises from the Local Plan.

Table 1 Traffic Data

Scenario	Road Link	AADT	HDV %	Average Daily Mean Speed (kph)
Base 2017 and Future Base (2038)	A275 Wych Cross A26 Poundgate	4,542 12,264	2.3% 3.4%	64 80
2038 Do Nothing	A275 Wych Cross A26 Poundgate	5,449 14,715	2.3% 3.4%	64 80
2038 Do Something	A275 Wych Cross A26 Poundgate	5,548 15,406	2.3% 3.2%	64 80

Receptors

Ecological receptors have been taken from the various parts of the SAC, which abuts the road, every 10 metres, up to 200m from the road. The ecological receptors relevant to this project are included in Appendix A within Table A 1, and their locations presented in Figure 1.

Model Setup

Road traffic emissions of NOx were derived using Defra's current Emission Factor Toolkit (EFT v10.1) and associated tools[1]. Road traffic emissions of NH_3 were derived using Air Quality Consultants' Calculator for Road Emissions of Ammonia (CREAM) V1A)[2].

Detailed dispersion modelling was undertaken using ADMS-Roads v5.0 to model concentrations of NOx and NH_3 using the parameters in Table 2 for the following scenarios:

1. 2017 Baseline – 2017 AADT, emission factors and background concentrations;
2. 2038 Future Baseline – 2017 AADT, 2030 emission factors and background concentrations (the latest projected year available from Defra);
3. 2038 Do Nothing – 2038 AADT without Local Plan, 2030 emission factors and background concentrations;
4. 2038 Do Something – 2038 AADT with Local Plan in place, 2030 emission factors and background concentrations.

Table 2 General ADMS-Roads Model Conditions

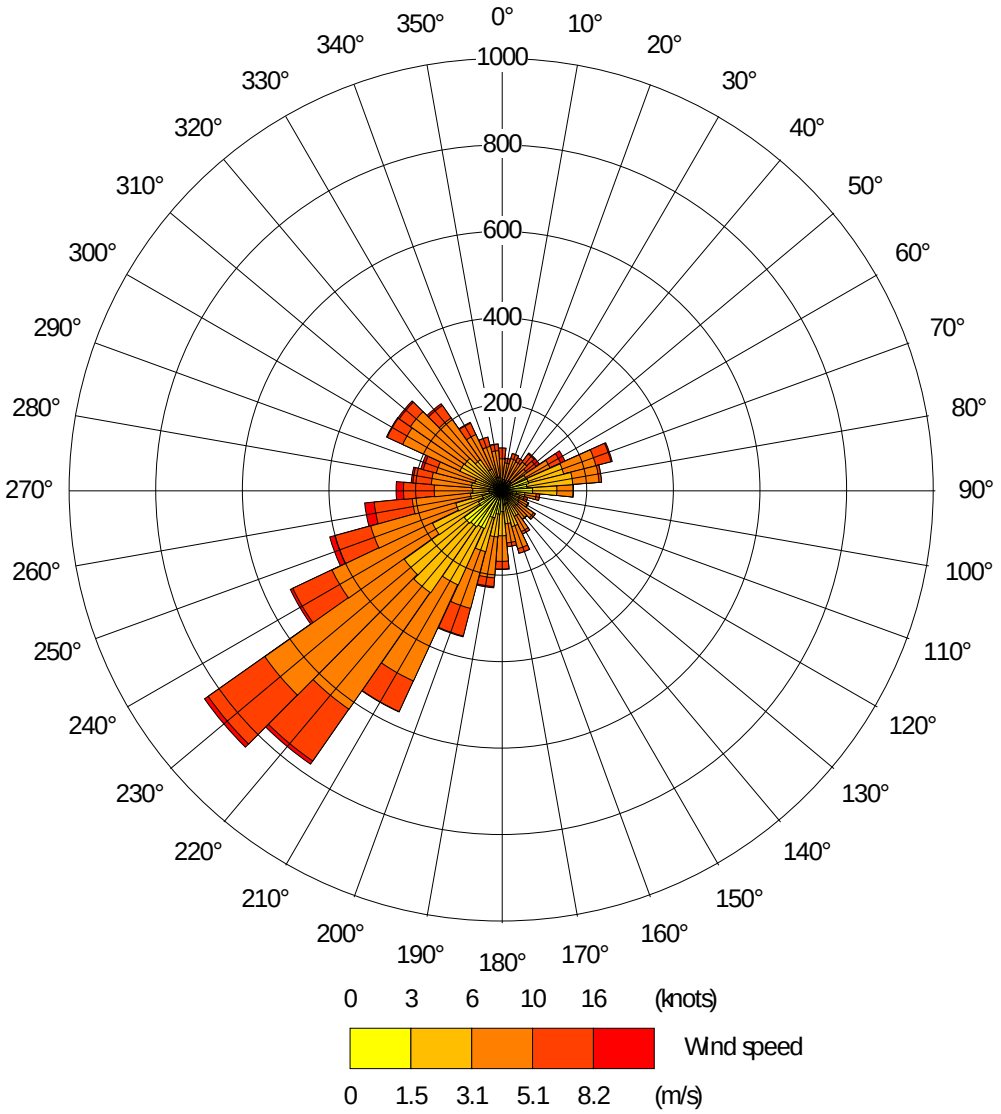
Variables	ADMS-Roads Model Input
Surface roughness at source	0.5m
Surface roughness at Metrological Site	0.2m
Minimum Monin-Obukhov length for stable conditions	30m
Receptor location	x, y coordinates determined by GIS, z = 0m for ecological receptors.
Emissions	NO_x – Defra's EFT v10.1. NH_3 – CREAM V1A
Meteorological data	1 year (2017) hourly sequential data from Gatwick Airport meteorological station.
Receptors	Ecological
Model output	Long-term (annual) mean NO_x and NH_3 concentrations.

Meteorological Data

One year (2017) of hourly sequential observation data from Gatwick Airport meteorological station has been used in this assessment to correspond with the baseline year. The station is located approximately 15km north-west of the SAC and experiences meteorological conditions that are representative of those experienced within the air quality study area. Figure 2 shows that the dominant direction of wind is from the south-west, as is typical for the UK. The wind speed ranges from 0-18 knots (0 - ~9.3 m/s).

[1] https://laqm.defra.gov.uk/
[2] https://www.agconsultants.co.uk/resources/ammonia-emissions-from-roads-for-assessing-impacts

Figure 2 Wind Rose of Gatwick Met Data 2017



Background Data

Background data for NO_2 and NOx concentrations for 2018 and 2030 have been sourced from Defra's 2018-based background maps for receptors within the nearest 1km by 1km grid squares (Table 3). The NO_2 and NOx concentrations for 2017 were back projected from 2018 using continuous background monitors within 50km of the site. The data shows that the mapped background concentrations are predicted to decrease between 2017 and 2030.

Table 3 Defra Mapped Background Pollutant Concentrations (µg/m³)

Grid Square (X, Y)	Annual Mean Concentrations			
	2017 NO_2	2017 NOx	2030 NO_2	2030 NOx
548500,128500	8.1	10.5	5.4	6.9
541500,131500	8.9	11.6	6.0	7.6
541500,132500	9.1	11.9	6.1	7.7
541500,133500	9.1	12.0	6.1	7.8
542500,133500	9.0	11.8	6.0	7.7

Ecological Data

The annual mean critical levels of NOx and NH_3, concentrations above which adverse effects on ecosystems may occur based on present knowledge are summarised in Table 4.

Table 4 Annual Mean Critical Levels (NOx and NH_3)

Pollutant	Critical Level
Oxides of nitrogen (NOx)	30 µg/m^3
Ammonia (NH_3)	3 µg/m^3 1 µg/m^3 for lichens and bryophytes

The Air Pollution Information System[3] (APIS) provides 'a searchable database and information on pollutants and their impacts on habitats and species'. The parameters for *Dwarf Shrub Heath* were taken from APIS and are presented in Table 5.

A 1.4 kgN/ha/yr improvement in the APIS nitrogen deposition rates has been assumed from the APIS 2016-2018 values to the future year.

Table 5 Air Pollution Information System (APIS) Data of the Ecological Receptors.

Receptor	Av. N Dep Rate kgN/ha/yr	Critical Load Av. N Dep Rate kgN/ha/yr	Total Av. Acid Dep Rate keq/ha/yr	Nitrogen Av. Acid Dep Rate keq/ha/yr	Critical Load Nitrogen Av. Acid Dep Rate keq/ha/yr	Ammonia µg/m^3	Habitat	APIS Data Year
38 (Transect)	13.42	10-20	1.107	0.959	0.714 - 2.444	0.86	Dwarf Shrub Heath	2016 - 2018
37W (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
37E (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
34 (Transect)	14.149	10-20	1.164	1.011	0.714 - 2.444	0.99	Dwarf Shrub Heath	2016 - 2018
33 (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
6b_37_33 (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
6b_3 (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
6aSW (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
6aSE (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
6aNE (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018
33N (Transect)	14.601	10-20	1.211	1.043	0.714 - 2.444	0.84	Dwarf Shrub Heath	2016 - 2018

[3] http://www.apis.ac.uk/

Verification

Local air quality monitoring was carried out along the modelled network in the vicinity of Ashdown Forest during 2017. The monitoring data are used make a comparison between modelled and measured concentrations to enable the model results to be adjusted to bring the modelled concentrations in-line with measurements. 17 sites were used for verification that measured NO_2 concentration, this produced a verification factor of 2.40 for NOx. A verification factor of 1.0 for NH_3 hasbeen applied based on previous verification and validation of the CREAM tool. Note the CREAM tool was created based on the 2017 data obtained therefore the verification factor used for NH_3 is deemed appropriate.

Deposition velocities

Deposition of nitrogen from road traffic derived NH_3 and NO_2 to heathland are estimated using the AQTAG deposition velocities that are cited in the 2020 IAQM guidance[4], as shown in Table 6Table 6.

Table 6 Air Pollution Information System (APIS) Data of the Ecological Receptors.

Pollutant	Habitat	Nitrogen deposition conversion rates	Deposition velocity
NO_2	Heathland	1 µg/m^3 NO_2= 0.14 kgN/ha/yr	0.0015 m/s
NH_3	Heathland	1 µg/m^3 NH_3 = 5.19 kgN/ha/yr	0.020 m/s

Limitations

The verification factor obtained for NO_2 has a RMSE of NO_2 and NOx of 5.4 and 10.9 respectively and therefore results should be viewed with caution.

[4] https://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2020.pdf

Appendix A

Table A 1 Receptor locations, height and distance from road

ID	X	Y	Height (m)	Distance from Road (m)	ID	X	Y	Height (m)	Distance from Road (m)
38_0m	548982	128871	0	0	6b_37_33_70m	541979	131726	0	70
38_5m	548982	128875	0	5	6b_37_33_80m	541980	131716	0	80
38_10m	548981	128880	0	10	6b_37_33_90m	541981	131706	0	90
38_15m	548981	128885	0	15	6b_37_33_100m	541982	131696	0	100
38_20m	548981	128890	0	20	6b_37_33_125m	541984	131671	0	125
38_30m	548980	128900	0	30	6b_37_33_150m	541986	131646	0	150
38_40m	548979	128910	0	40	6b_37_33_175m	541988	131621	0	175
38_50m	548978	128920	0	50	6b_37_33_200m	541990	131596	0	200
38_60m	548977	128930	0	60	6b_3m	541952	132151	0	3
38_70m	548976	128940	0	70	6b_8m	541947	132151	0	8
38_80m	548975	128950	0	80	6b_13m	541942	132151	0	13
38_90m	548975	128960	0	90	6b_18m	541937	132151	0	18
38_100m	548974	128970	0	100	6b_23m	541932	132151	0	23
38_125m	548971	128995	0	125	6b_33m	541922	132151	0	33
38_150m	548969	129020	0	150	6b_43m	541912	132151	0	43
38_175m	548967	129045	0	175	6b_53m	541902	132151	0	53
38_200m	548965	129070	0	200	6b_63m	541892	132151	0	63
37W_0m	541743	131117	0	0	6b_73m	541882	132151	0	73
37W_5m	541738	131119	0	5	6b_83m	541872	132151	0	83
37W_10m	541734	131120	0	10	6b_93m	541862	132151	0	93
37W_15m	541729	131122	0	15	6b_103m	541852	132151	0	103
37W_20m	541724	131124	0	20	6b_128m	541827	132151	0	128
37W_30m	541715	131127	0	30	6b_153m	541802	132151	0	153
37W_40m	541705	131131	0	40	6b_178m	541777	132151	0	178
37W_50m	541696	131134	0	50	6b_203m	541752	132151	0	203
37W_60m	541687	131137	0	60	6aSW_0m	541684	133345	0	0
37W_70m	541677	131141	0	70	6aSW_5m	541680	133346	0	5
37W_80m	541668	131144	0	80	6aSW_10m	541675	133347	0	10
37W_90m	541658	131148	0	90	6aSW_15m	541670	133349	0	15
37W_100m	541649	131151	0	100	6aSW_20m	541665	133350	0	20
37W_125m	541626	131160	0	125	6aSW_30m	541655	133352	0	30
37W_150m	541602	131168	0	150	6aSW_40m	541646	133355	0	40
37W_175m	541579	131177	0	175	6aSW_50m	541636	133358	0	50

ID	X	Y	Height (m)	Distance from Road (m)	ID	X	Y	Height (m)	Distance from Road (m)
37W_200m	541555	131185	0	200	6aSW_60m	541626	133360	0	60
37E_0m	541749	131115	0	0	6aSW_70m	541617	133363	0	70
37E_5m	541754	131113	0	5	6aSW_80m	541607	133365	0	80
37E_10m	541759	131111	0	10	6aSW_90m	541598	133368	0	90
37E_15m	541764	131110	0	15	6aSW_100m	541588	133371	0	100
37E_20m	541768	131108	0	20	6aSW_125m	541564	133377	0	125
37E_30m	541778	131105	0	30	6aSW_150m	541540	133383	0	150
37E_40m	541787	131101	0	40	6aSW_175m	541515	133390	0	175
37E_50m	541796	131098	0	50	6aSW_200m	541491	133396	0	200
37E_60m	541806	131094	0	60	6aSE_0m	541692	133343	0	0
37E_70m	541815	131091	0	70	6aSE_5m	541696	133342	0	5
37E_80m	541825	131087	0	80	6aSE_10m	541701	133341	0	10
37E_90m	541834	131084	0	90	6aSE_15m	541706	133339	0	15
37E_100m	541843	131081	0	100	6aSE_20m	541711	133338	0	20
37E_125m	541867	131072	0	125	6aSE_30m	541720	133335	0	30
37E_150m	541890	131064	0	150	6aSE_40m	541730	133333	0	40
37E_175m	541914	131055	0	175	6aSE_50m	541740	133330	0	50
37E_200m	541937	131046	0	200	6aSE_60m	541749	133328	0	60
34_0m	544785	126930	0	0	6aSE_70m	541759	133325	0	70
34_5m	544789	126933	0	5	6aSE_80m	541769	133322	0	80
34_10m	544793	126937	0	10	6aSE_90m	541778	133320	0	90
34_15m	544797	126940	0	15	6aSE_100m	541788	133317	0	100
34_20m	544800	126943	0	20	6aSE_125m	541812	133311	0	125
34_30m	544808	126949	0	30	6aSE_150m	541836	133304	0	150
34_40m	544816	126956	0	40	6aSE_175m	541861	133298	0	175
34_50m	544823	126962	0	50	6aSE_200m	541885	133291	0	200
34_60m	544831	126969	0	60	6aNE_0m	542134	133965	0	0
34_70m	544839	126975	0	70	6aNE_5m	542139	133964	0	5
34_80m	544846	126982	0	80	6aNE_10m	542144	133962	0	10
34_90m	544854	126988	0	90	6aNE_15m	542148	133960	0	15
34_100m	544862	126994	0	100	6aNE_20m	542153	133959	0	20
34_125m	544881	127011	0	125	6aNE_30m	542162	133955	0	30
34_150m	544900	127027	0	150	6aNE_40m	542172	133952	0	40
34_175m	544919	127043	0	175	6aNE_50m	542181	133948	0	50
34_200m	544938	127059	0	200	6aNE_60m	542191	133945	0	60
33_0m	543730	130183	0	0	6aNE_70m	542200	133941	0	70
33_5m	543726	130180	0	5	6aNE_80m	542209	133938	0	80
33_10m	543721	130177	0	10	6aNE_90m	542219	133935	0	90
33_15m	543717	130175	0	15	6aNE_100m	542228	133931	0	100

ID	X	Y	Height (m)	Distance from Road (m)	ID	X	Y	Height (m)	Distance from Road (m)
33_20m	543713	130172	0	20	6aNE_125m	542252	133923	0	125
33_30m	543705	130166	0	30	6aNE_150m	542275	133914	0	150
33_40m	543697	130160	0	40	6aNE_175m	542299	133906	0	175
33_50m	543689	130155	0	50	6aNE_200m	542322	133897	0	200
33_60m	543680	130149	0	60	33N_0m	542741	131062	0	0
33_70m	543672	130143	0	70	33N_5m	542738	131058	0	5
33_80m	543664	130137	0	80	33N_10m	542735	131055	0	10
33_90m	543656	130132	0	90	33N_15m	542732	131051	0	15
33_100m	543648	130126	0	100	33N_20m	542728	131047	0	20
33_125m	543627	130112	0	125	33N_30m	542722	131039	0	30
33_150m	543607	130097	0	150	33N_40m	542716	131032	0	40
33_175m	543586	130083	0	175	33N_50m	542709	131024	0	50
33_200m	543566	130069	0	200	33N_60m	542703	131016	0	60
6b_37_33_0m	541973	131796	0	0	33N_70m	542696	131009	0	70
6b_37_33_5m	541973	131791	0	5	33N_80m	542690	131001	0	80
6b_37_33_10m	541974	131786	0	10	33N_90m	542683	130993	0	90
6b_37_33_15m	541974	131781	0	15	33N_100m	542677	130986	0	100
6b_37_33_20m	541975	131776	0	20	33N_125m	542661	130966	0	125
6b_37_33_30m	541975	131766	0	30	33N_150m	542645	130947	0	150
6b_37_33_40m	541976	131756	0	40	33N_175m	542629	130928	0	175
6b_37_33_50m	541977	131746	0	50	33N_200m	542613	130909	0	200
6b_37_33_60m	541978	131736	0	60					

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4 March 2021

David Scully
Tunbridge Wells Borough Council

Tunbridge Wells Regulation 19 Local Plan HRA

Dear David,

Thank you for notifying me of an update made to the Regulation 19 Local Plan since AECOM completed the Local Plan Habitats Regulations Assessment (HRA) in December 2020. Since the 2020 HRA was written, one further development site (AL/HA 5, Land to the north of Birchfield) has been included within the Local Plan and is allocated for a medical centre and associated parking. The previous sites H5 to H7 (as numbered in the HRA) thus become H6 to H8.

The HRA of the Local Plan was primarily based upon the total quantum of growth in Tunbridge Wells Borough over the period to 2038, due to the relationship between the Borough and the relevant European sites. Traffic modelling undertaken for the HRA identified that the precise distribution of new development in Tunbridge Wells Borough had very little effect on the total additional vehicle flows (Annual Average Daily Traffic) on roads within 200m of Ashdown Forest Special Area of Conservation and Special Protection Area. Since the headline development figures in Policy STR1 remain unchanged from those in the HRA (a minimum of 12,204 dwellings and 14 hectares of employment (Use Class B)) and its traffic and air quality modelling, I can confirm that the inclusion of this further development site does not alter the conclusions of the Local Plan HRA.

I would also like to take the opportunity to correct two errata in the HRA report; these are simply typographical errors:

- Firstly, while the revised strategic policies (SS1 to SS3) are correctly named in Appendix 1 of the HRA the policy list on page 20 of the HRA refers to the previous versions of the policies from an earlier iteration of the plan.
- Secondly, in the table on page 28 of the HRA, we refer to 14,000m2 of employment land regarding Policy STR1; a zero was omitted from this text and the correct figure should be 140,000m^2.

Yours sincerely,

Dr James Riley
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