

# Analysis of the Implications of Tunbridge Wells Borough Local Plan: Issues and Options for European Sites

Tunbridge Wells Borough Council

March 03 2017

## Quality information

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
1	03/03/17	Draft	JR	James Riley	Associate
2	31/03/17	Final	JR	James Riley	Associate

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# 1. Background

## 1.1 Introduction

Tunbridge Wells Borough Council is preparing a new Local Plan. This will replace the existing Local Plan 2006, Core Strategy and associated Development Plan Documents (DPDs). The new Local Plan will identify requirements for development and growth within the borough, including the provision of when and where development and growth will occur. The Plan will provide broad locations and specific allocations for types of development and criteria based development management policies throughout the Plan period (2013 – 2033).

In June 2010 the Council adopted its Core Strategy Development Plan Document, and in July 2016 it adopted the Tunbridge Wells Borough Council Site Allocations Local Plan. The HRA of both these documents identified potential linking pathways that could result in adverse effects upon the Ashdown Forest SAC and SPA. Key impact pathways investigated included recreational pressure and atmospheric pollution derived from traffic flows. As such this report focusses on those two impact pathways. Background to Ashdown Forest SAC and SPA and recreational pressure and atmospheric pollution impact pathways are summarised later in this Chapter.

The new Local Plan is in the early stages of development and does not therefore currently include any policies, specific proposals or site allocations. It is therefore too early in the development of the Plan for a meaningful Habitat Regulations Assessment to be undertaken. However, since the Issues and Options do present five broad potential spatial options on pages 35-44 of the document, and the Objectively Assessed Need for the borough is known (648 dwellings per annum, or 12,960 over 20 years (2013-33)<sup>1</sup>, it is possible for the relative merits and demerits of those options to be discussed within the context of their relative implications for European sites. That is the purpose of this document. As the Plan is further developed to include actual proposals and draft policies, this analysis will be followed by an actual Habitat Regulations Assessment.

Although the Issues and Options document does not identify any precise quantum or type of development in a particular location, it does outline key areas on which the Council wishes to provide policy. These include the natural and built environment, infrastructure, housing, economy, transport and parking, leisure and recreation, sustainability and the provision of DM polices. Topic areas that will be considered by the Council for DM policies include: development principles (sustainable development, parking, resource management, design), economy and centres (town centres, retail and leisure, rural economy, key employment areas, tourism), housing and healthy communities: (housing (including affordable and specialist housing, e.g. elderly, self-build, starter homes), community facilities, recreation, leisure, open space, health and wellbeing), natural and historical environment (listed buildings, conservation areas, shop fronts, landscape, climate change, flooding, countryside protection, and infrastructure (sustainable transport, telecommunications, utilities, health, education, green infrastructure). The text within the Issues and Options document does not provide sufficient detail to provide any linking impact pathways to European designated sites. The remainder of the Local Plan Issues and Options document (i.e. excluding the five Growth Options) does not provide sufficient detail in terms of development type, quantum or location to trigger Habitats Regulations Assessment considerations as the document does not provide sufficient detail to identify potential impact pathways linking the Local Plan Issues and Options document to any European designated sites and does not require further consideration within this report.

## 1.2 Ashdown Forest SAC and SPA

Ashdown Forest is an extensive area of common land lying between East Grinstead and Crowborough entirely within Wealden District Council. 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.

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<sup>1</sup> Whilst no quantitative element is provided, the Local Plan Issues and Options Document does provide the borough's full objective assessment need for housing. This is 12,960 for the 20 year period (648 per annum).

The SPA is designated for its populations of breeding:

- Dartford Warbler *Sylvia undata*
- Nightjar *Caprimulgus europaeus*

The SAC is designated for its Annex I habitats:

- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

The SAC is designated for its Annex II species:

- Great crested newt *Triturus cristatus*

## 1.3 Growth Options

To aid the development of the new Local Plan, the Issues and Options document provides five possible Growth Options for new, mostly residential, development; these include highly concentrated growth around Royal Tunbridge Wells and development dispersed across the borough. Full details of the five Growth Options are not replicated within this report, but are summarised in Table 1. Full details of the five Growth Options are provided in pages 35-44 of the Local Plan Issues and Options document. It may be that the actual proposed strategy will be a combination of the options present in Table 1.

**Table 1. Five Growth Option**

Option	Broad Description
Option 1: Focused Growth	Development distribution focused as per existing Core Strategy, i.e. majority of new development directed to Royal Tunbridge Wells/Southborough, a smaller proportion to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst and limited development within the villages and rural areas.
Option 2: Semi-dispersed Growth	Development distribution semi-dispersed, with the majority of new development directed to Royal Tunbridge Wells/Southborough and a proportion distributed to the other three main settlements of Paddock Wood, Cranbrook and Hawkhurst (as per Option 1), but additionally a percentage of development directed to some of the larger villages (taking account of the updated settlement hierarchy work). Limited development within the remaining villages and rural areas.
Option 3: Dispersed Growth	Development distribution proportional across all of the borough's settlements.
Option 4: Growth Corridor-led Approach	Development distribution focused around the A21, close to Royal Tunbridge Wells and Pembury, as a new 'growth corridor'.
Option 5: New Settlement Growth	New freestanding 'Garden Village' settlement. There is no location identified with this option. A new settlement could be located anywhere within the borough (we are inviting views on the principle of a new settlement in providing for the future development needs of the borough).

No distribution of housing provision or employment development is currently included in each of the Growth Options but the Council is expected to provide the full development needs of the Borough unless significant constraints prevent it from doing so.

## 1.4 Potential Impact Pathways Linking the Issues and Options Document to the Internationally Designated Site

The following section provides a general plan-level discussion of potential impact pathways stemming from the five Growth options of the Tunbridge Wells Borough Council Issues and Options document that could interact with Ashdown Forest, based on the pathways identified in the HRA of the adopted Core Strategy and Site Allocations DPD. The two impact pathways discussed are recreational pressure and atmospheric pollution (linked to transport).

### 1.4.1 Recreational Pressure

Tunbridge Wells Borough is 4.6km from the SAC/SPA boundary at its closest. In 2010 a visitor survey of Ashdown Forest SAC/SPA was undertaken<sup>2</sup>. 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 7 km 'outer zone' for Ashdown Forest SAC/SPA was agreed with Natural England<sup>3</sup>. Affected authorities that provided development within this affected 7 km '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.

The adopted Tunbridge Wells Borough Site Allocations DPD does not allocate any housing sites within this 7km zone; there are no Strategic Housing Land Availability Assessment sites located in either Stone Cross or Ashurst and given the small size of those villages even windfall development (i.e. small-scale planning applications on sites not specifically allocated in the DPD) is unlikely. The nearest site to the SAC/SPA that is mentioned in the Site Allocations DPD is AL/GB3 at Langton Green, a development site which is 9km away from the SPA/SAC. Therefore, the HRAs of the Tunbridge Wells Borough Core Strategy, and the subsequent Site Allocations DPD, concluded that adverse effects on Ashdown Forest through the pathway of recreational pressure were unlikely even in combination. However, it was recommended that Tunbridge Wells Borough Council should monitor progress with the ongoing assessment and recreational management studies being undertaken on the SAC/SPA by Wealden District Council (the authority within which Ashdown Forest is located) and be prepared to participate in any collaborative cross-authority management plan or associated scheme that ultimately derives from these studies. It is noted that a second call for sites is to be carried out in May/June 2017 and this may include sites located between 7 km and 9 km from Ashdown Forest.

In 2016 Footprint Ecology updated the visitor survey<sup>4</sup> on behalf of the participating Councils, in order to provide comprehensive and up-to-date data on recreational use of Ashdown Forest and inform the strategic implementation of access management measures, the direction of strategic access management and monitoring, the design and ongoing management of SANG to ensure they functionally divert recreational pressure from Ashdown Forest and to assist local authorities in undertaking planning functions in relation to the Habitats Regulations. That updated survey has resulted in a review of the zones, although the 7km zone is still recognised as a core zone for delivering mitigation.

In summary, the survey identified that, while the 7km zone still captured the majority of visitors (including the vast majority of frequent (i.e. at least monthly) visitors) to the SAC/SPA, the core catchment of the site could be considered slightly larger than previously identified. The 2016 survey identified that 78% of survey respondents whose postcodes could be mapped lived within 7km of the SAC/SPA boundary, with 81% living within 9km.

The 2016 visitor survey identified that 72% of all interviewees<sup>5</sup> whose postcodes were mapped were from Wealden District, with a further 12% from Mid Sussex and 5% from Tunbridge Wells Borough, thus identifying a clear pattern whereby those who visited Ashdown Forest tended to live closer to the SPA with only 5% of visitors<sup>6</sup> coming from Tunbridge Wells Borough. This clearly shows that visitors from Tunbridge Wells Borough represent a minority of visitors to the SAC/SPA, although that does not mean they do not need to be considered 'in combination'.

Reviewing the 2016 visitor survey data with specific regard to its relevance to Tunbridge Wells Borough identifies that:

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<sup>2</sup> 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

<sup>3</sup> UE Associates. October 2011. Habitat Regulations Assessment for the Mid-Sussex District Plan

<sup>4</sup> Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.

<sup>5</sup> Excluding those who were on holiday or staying with friends or family

<sup>6</sup> Twenty Three respondents were interviewed from Tunbridge Wells Borough.

- When looking at frequent visitor use (which could be defined most broadly as ‘at least once a month’), only c.4% of visitors to Ashdown Forest come from Tunbridge Wells Borough, with c.90% of frequent visitors coming from Wealden or Mid-Sussex;
- 78% of visitors to the forest from Tunbridge Wells Borough originated from Royal Tunbridge Wells, identifying that the majority of visitors from Tunbridge Wells Borough stem from Royal Tunbridge Wells itself;
- of all respondents from Tunbridge Wells Borough, 65% visited the Forest once a month or less, with 20% of visitors visiting the forest more frequently than once a month; and
- 65% of visitors from Tunbridge Wells Borough also visited other sites. The data indicates that almost twice as many Tunbridge Wells Borough -based interviewees visit other sites ‘frequently’ (i.e. more than 40 visits a year) compared to Ashdown Forest (30% made more than 40 visits a year to other sites, compared to 17% who made more than 40 visits a year to Ashdown Forest).

The above analysis of visitors from Tunbridge Wells Borough indicates that Ashdown Forest is not a fundamentally important location for recreational activity for residents from Tunbridge Wells Borough, in comparison to visitors that live closer to Ashdown Forest. However, a majority of visitors to the site from Tunbridge Wells Borough were dog walkers (65%), which is the main disturbance pathway and as such it is likely that these visitors do contribute to a level of disturbance to Ashdown Forest.

At a meeting on 14<sup>th</sup> December 2016 between Natural England and relevant authorities surrounding Ashdown Forest SAC/SPA, a zonal approach was discussed for new Local Plans. Based on that discussion TWBC are using the following assumptions as a worst case scenario until final details of any change in approach is adopted by the Council and agreed by Natural England:

- A 400m-7km zone within which SANG and SAMM would be provided, assuming there was growth in that area (hereafter referred to as the ‘inner zone’); and
- A 7-9km zone (hereafter referred to as the ‘outer zone’), within which ‘SAMM only’ would generally be the appropriate mitigation measure, particularly given the relatively lower importance that Ashdown Forest constitutes as a recreational resource for residents of Tunbridge Wells Borough (the main contributing settlement within this zone), which suggests that those Tunbridge Wells Borough residents who do visit the SAC/SPA particularly want to visit that site rather than an alternative. In this zone it was suggested that there could be some finessing of mitigation solutions to local authority circumstances provided it was supported by the evidence.

Based on the evidence and the discussions to date, TWBC are of the view that it would be inappropriate for the 9 km zone to be a totally hard line (which could therefore potentially divide streets) but that a judgement would be made by the Council on a case by case basis to determine the requirement for mitigation. This would enable the Council to make a judgement on the impact of a development approximately 9 km from the Forest dependant on its dwelling provision (as an example a site of 1 dwelling 8.9 km from the Forest may actually have a much less significant impact upon recreational pressure in comparison to a 50 dwelling site 9.1 km from the Forest). Note that there is no intention to apply this adjusted zone retrospectively to developments that already have planning permission, or to alter Tunbridge Wells Borough Council policy until such time as discussions on any new zone(s) are concluded and an agreement is reached with Natural England.

Only a small portion of the borough lies with 7 km of the SAC/ SPA. Settlements located less than 7 km from the SAC/SPA within Tunbridge Wells Borough are Ashurst and Stone Cross. These are both small settlements. None of the five Growth Options provide for new growth within the 7 km ‘zone’. The closest settlements providing growth are Langton Green, Rusthall and Royal Tunbridge Wells. The distances of these settlements and others identified in the Growth Options are illustrated in Table 2:

**Table 2: Distances from Settlements Potentially Identified to Provide Growth in the Issues and Options Document to Ashdown Forest SAC/SPA.**

Settlement	Minimum Approximate Distance From Ashdown Forest
Langton Green	Entirely between 7 km and 9 km from the SAC/SPA
Royal Tunbridge Wells and Southborough	A portion of south west of Royal Tunbridge Wells is located between 7 km and 9 km from Ashdown Forest SAC/SPA.



Rusthall	A portion of south west of Rusthall is located between 7 km and 9 km from Ashdown Forest SAC/SPA.
Speldhurst	At its closest located over 9 km from Ashdown Forest SAC/SPA.
Pembury, Bidborough, Cranbrook, Goudhurst, Paddock Wood, Hawkhurst (Highgate and The Moor), Brenchley, Lamberhurst, Five Oak Green, Sandhurst, Benenden, Horsmonden, Sissinghurst, Frittenden, Matfield, Iden Green and Kilndown	All located 10km or more from Ashdown Forest SCA/SPA at their closest
Proposed New Settlement	The geography and nature of the Borough is such that all options for a new settlement are likely to be east of Royal Tunbridge Wells and therefore no closer than around 12km

New residential development delivered at settlements beyond 10 km will not result in likely significant effects upon the SAC/SPA and as such do not need further consideration. New development allocations in Langton Green, the south-west of Royal Tunbridge Wells, or the south-west of Rusthall fall within the 7km to 9km zone and thus may need to contribute to SAMM.

## 1.4.2 Atmospheric Pollution

In addition to recreational pressure atmospheric pollution requires further consideration. Historic studies into the transport and air quality impacts of development upon Ashdown Forest have been coordinated by Wealden Council. This has been documented in a series of reports produced to inform the HRAs of the Mid-Sussex District Plan<sup>7</sup> and the Wealden Core Strategy<sup>8</sup> and further reports will emerge to inform the Wealden Local Plan. Within Tunbridge Wells Borough, Royal Tunbridge Wells does lie on the A26 but is over 9km from the SAC/SPA and has previously not been identified as a significant contributory settlement to traffic flows past Ashdown Forest. Most transport interactions from the borough of Tunbridge Wells are likely to be with other Kent authorities to the North and East and therefore in the opposite direction to the SAC/SPA. For these reasons, it was agreed with Natural England for the adopted Core Strategy and Site Allocations DPD that traffic growth past Ashdown Forest as a result of development in Tunbridge Wells Borough over the Core Strategy period was likely to be trivial and thus could be considered not to result in a likely significant effect either alone or in combination. Nonetheless, Wealden District Council committed in Policy WCS12 of their Core Strategy to: *'In the first review of the Core Strategy the Council will undertake further investigation of the impacts of nitrogen deposition on the Ashdown Forest Special Area of Conservation so that its effects on development in the longer term can be more fully understood and mitigated if appropriate'* and, although no requirement was identified for Tunbridge Wells Borough Council to participate in this process, Tunbridge Wells Borough Council contributed 5% of the cost of the modelling work.

At this stage, it is not possible to model the potential contribution of further growth provided by Tunbridge Wells Borough under its new Local Plan to air quality in Ashdown Forest as there are no defined growth location(s) with associated quanta. However, to illustrate the potential relative contribution to traffic movements past Ashdown Forest from the five Growth Options set out in the Issues and Options document, some predictive traffic calculations has been undertaken. The calculations considered what scale of growth would be required under each scenario to result in different levels of traffic growth past Ashdown Forest. For the purposes of this assessment this was limited to number of households and does not include traffic flows from economic activities.

In general, it is likely that traffic within the western part of the borough, including Royal Tunbridge Wells, will be likely to use the A26 when travelling to / from the south west, whereas development located in the east of the borough may use alternative routes. For this task, AECOM have used

<sup>7</sup> UE Associates. 2008. Habitats Regulations Assessment for the Mid Sussex District Council Core Strategy: Mid Sussex Air Quality Baseline Study

<sup>8</sup> East Sussex County Council and Wealden District Council. February 2011. The assessment of the increase in traffic resulting from the Wealden District Proposed Submission Core Strategy on The Ashdown Forest Special Area of Conservation and The Lewes Downs Special Area of Conservation

Census ‘journey to work’ data to derive a trip distribution for the borough. This was applied to different areas of the borough in the context of the A26 to estimate the areas of the borough which would and would not be expected to generate traffic along this route.

To determine how much of the development under each option would be based in the western portion of the Borough (i.e. the area where trips to/ from locations south west of the Borough would be expected to use the A26 adjacent to Ashdown Forest), the concept plans for each Growth Option were evaluated. The estimated/ assumed proportions of growth in each Growth Option are presented in Table 3.

Calculations estimated the volume of development that was expected to generate sufficient traffic to reach three thresholds (500 Annual Average Daily Traffic (AADT), 1000 AADT and 2000 AADT). To do this, an estimated per household vehicle trip rate was applied to the potential number of new dwellings that gave an idea of the level of residential development that may be able to be accommodated in the context of this threshold.

The relative accessibility of development sites was also considered. For example, growth targeted around Royal Tunbridge Wells and Paddock Wood, which have railway stations, may generate less vehicular traffic. Equally, for the possible new settlement under Option 5, two scenarios were calculated: one that assumed relatively poor public transport accessibility and one that assumed excellent public transport accessibility. For the purposes of this calculation exercise, it was assumed that the new settlement could be located in the western part of the borough as a worst-case scenario.

**Table 3: Estimated/ Assumed Distribution of Growth Under Each Growth Option.** <sup>9</sup>

<b>Growth Option</b>	<b>East</b>	<b>West</b>
Option 1 - Focused Growth	20%	80%
Option 2 - Semi-Dispersed Growth	15%	85%
Option 3 - Dispersed Growth	40%	60%
Option 4 - Corridor-led Approach	0%	100%
Option 5a - New Settlement (Poor Public Transport Accessibility)	0%	100%
Option 5b - New Settlement (Excellent Public Transport Accessibility)	0%	100%

It must be stressed that this calculation, and the resulting ranking of preferable Growth Options, is relatively crude at this point and is primarily intended to give an indication of the broad scale of growth under each option that would result in differing vehicle flows past Ashdown Forest.

<sup>9</sup> Percentages: These were used to broadly to estimate how much of this development would be in the western part of the Borough (i.e. the area where trips to/from locations south west of the Borough would be expected to use the A26 through the forest).

Option 5a and 5b: 100% West was calculated as a worst case scenario – i.e. all development within a recreational catchment for Ashdown Forest. In reality this is unlikely as the majority of the Borough is located more than 9km from Ashdown Forest and beyond the core recreational catchment.

## 2. Analysis

### 2.1 The Local Plan Issues and Options document

As previously detailed, only the five Growth Options provided within the Local Plan Issues and Options document provide sufficient level of detail to enable high level discussions relating to Habitat Regulations Assessment and impacts on the Ashdown Forest SAC/SPA. These are the content of the following sections.

### 2.2 Recreational Pressure

#### 2.2.1 Growth Option 1: Focused Growth

Growth Option 1 provides for growth focused around four main settlements. These are Royal Tunbridge Wells, Southborough, Paddock Wood, Cranbrook, and Hawkhurst with limited development in villages and rural areas. Southborough, Paddock Wood, Cranbrook and Hawkhurst are all located more than 10 km from Ashdown Forest and as such development here would not have a recreational pressure effect on Ashdown Forest even when acting in combination.

A portion of Royal Tunbridge Wells is located within the 'outer zone' (i.e. between 7 km and 9 km from the SPA/SAC). As such any net new residential development within this part of the settlement will be required to provide appropriate strategic avoidance and mitigation. It is quite possible, however, that the majority of new development at Royal Tunbridge Wells under this option would lie 10km or more from the SPA/SAC and would thus not need to contribute to SAMM payments.

All remaining villages and rural areas that are specifically identified to potentially provide new growth in Option 1 are located at a sufficiently large distance from Ashdown Forest to not be considered to provide in combination recreational pressure effects upon the SPA/SAC.

#### 2.2.2 Option 2: Semi-dispersed Growth

This option is built around the same development locations as Option 1 (including Royal Tunbridge Wells). The analysis for that settlement is therefore not repeated. However Option 2 also explicitly allocates a proportion of development to some of the larger villages within the borough, including Rusthall. Most of these additional settlements are located at a sufficiently large distance from Ashdown Forest to provide no in combination recreational pressure effects upon the SPA/SAC. However, the south-west part of Rusthall does lie within 7-9km of the SAC/SPA.

While Option 2 would potentially involve less growth in Royal Tunbridge Wells, the explicit identification of Rusthall means that the total growth within 7-9km of the SAC/SPA may not be substantially different than under Option 1. However, there is a possibility that fewer residential developments will be located 7-9 km from the SAC/SPA due to additional growth locations in the east of the borough. As a result, if fewer new dwellings are provided within these zones this option will contribute a smaller percentage increase of visitors to Ashdown Forest and thus has the potential to be slightly more favourable for the SAC/SPA than Option 1.

#### 2.2.3 Option 3: Dispersed Growth

Option 3 provides growth proportionally across the borough's settlements. Similar to Option 2, this option provides for explicit growth in Rusthall and Royal Tunbridge Wells but it also explicitly provides for growth in Langton Green. Discussion of the impacts to Ashdown Forest stemming from new residential development in south-west Rusthall and south-west Royal Tunbridge Wells are not repeated in this section as they have already been discussed. Langton Green is wholly located within the 'outer zone' (i.e. between 7 km and 9 km from the SPA/SAC). Therefore net new residential development anywhere in the settlement of Langton Green in the new Local Plan will be required to provide appropriate strategic avoidance and mitigation SAMM contributions to ensure that the level of development provide does not result in adverse effects on the SPA/SAC.

Similarly to Option 2, Option 3 would involve less growth in Royal Tunbridge Wells, but the explicit identification of Rusthall and Langston Green means that the total growth within 7-9km of the SAC/SPA may not be substantially different than under Options 1 or 2. However, the fact that growth is going to be provided in a variety of settlements means that the percentage of development provided within 7-9 km of the SAC/SPA may ultimately be less (and thus slightly more favourable to the SAC/SPA) than Option 1 and Option 2.

### 2.2.4 Option 4: Growth Corridor-led Approach

This option focuses growth around the A21 between north Royal Tunbridge Wells and Pembury. The location of growth for this option is consistently more than 10 km from the SAC/SPA and as such net new residential development under this option is not considered to result in likely significant effects upon Ashdown Forest SAC/SPA either alone or in combination. As such, this is probably the most favourable Option from the point of view of minimising the impact on Ashdown Forest SAC/SPA. However, given the relatively small contribution that development in Tunbridge Wells Borough makes to visitor pressure in Ashdown Forest, and the fact that a mitigation solution exists, it is not considered that the benefits conveyed to Ashdown Forest are so great that they should outweigh other considerations when choosing a growth option.

### 2.2.5 Option 5: New Settlement Growth

Option 5 is a broad borough wide option for growth to be concentrated in a new ‘Garden Village’ settlement. The Issues and Options document deliberately avoids identifying possible locations at this point as it is only the principle that is being consulted upon. If a new Garden Village was provided within the ‘inner zone’ for Ashdown Forest (i.e. within 7 km of the SPA/SAC in the south-west corner of the borough), appropriate strategic avoidance and mitigation measures would be required. Similarly, if the new Garden Village was within the ‘outer zone’ (i.e. between 7 km and 9 km from the SPA/SAC) SMM contributions would be required. However, it is very unlikely that a new settlement would be placed in the south-west corner of the borough and the size of the borough provides numerous opportunities for any new settlement to be located entirely outside the recreational catchment of the SAC/SPA. As such, this Option could be equal (or better than) Option 4 as the most favourable one for Ashdown Forest SAC/SPA but that is entirely dependent on where in the borough this Growth Option is located.

## 2.3 Traffic Flows

For purposes of comparison, Table 3 identifies three flow thresholds of Annual Average Daily Traffic (AADT) against which each of the Growth Options are examined. These are 500 AADT, 1000 AADT and 2000 AADT, assuming the distribution of growth within the borough under each Option is as per Table 3. It must be noted that these thresholds have no inherent air quality significance in themselves. They do not represent thresholds at which a certain level of damage might occur.

**Table 4: Volume of Residential Development under each option that would Generate Each AADT Threshold on the A26 through Ashdown Forest**

Growth Option	Max. Households Within Threshold (i.e. one additional house would exceed the threshold)		
	500 AADT	1,000 AADT	2,000 AADT
Option 1 - Focused Growth	2,362	4,725	9,450
Option 2 - Semi-Dispersed Growth	2,148	4,296	8,593
Option 3 - Dispersed Growth	2,762	5,525	11,050
Option 4 - Corridor-led Approach	1,561	3,123	6,246
Option 5a - New Settlement if located in the west as a worst-case (Poor Public Transport Accessibility)	1,476	2,952	5,904
Option 5b - New Settlement if located in the west as a worst-case (Excellent Public Transport Accessibility)	2,032	4,065	8,130

Note that Table 4 presents the housing numbers for the entire borough, rather than just those in the west.

### 2.3.1 Discussion

From Table 4 it is possible to rank the Growth Options in order of relative scale of flow change, from more positive to less positive<sup>10</sup>:

- i. Option 3
- ii. Option 1
- iii. Option 2
- iv. Option 5<sup>11</sup>
- v. Option 4

Option 3 ranks highest, meaning that it could accommodate the greatest housing growth with the least effect on traffic flows within 200m of Ashdown Forest.

Although these calculations assume as a worst-case that a new settlement could be located in the west of the borough, this is very unlikely in practice. If Option 5 was placed in the eastern part of the borough, it is likely that Option 5 would rank at least equal to Option 3 and possibly more highly.

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<sup>10</sup> Since these thresholds have no intrinsic air quality importance it would be incorrect to interpret this ranking as meaning that any option was 'preferred' or 'unfavourable'

<sup>11</sup> while there is a slight difference in the expected flow change for Option 5 if 'excellent' or 'poor' access to public transport is assumed, the difference isn't so great as to change its placing

## 3. Conclusions

### 3.1 Recreational Pressure

In summary, the level of detail provided within the Local Plan Issues and Options document provides insufficient detail to fully determine the effect of the five Growth Options on Ashdown Forest SAC/SPA as a result of increased recreational pressure from new residential growth. At a strategic level it has been identified that existing levels of recreational activity from residents who live in Tunbridge Wells Borough contributes approximately 5% of all visits to Ashdown Forest or only 4% of frequent visits (i.e. once a month or more frequent). The following discussion compares the five Growth Options identified in the Local Plan Issues and Options document as discussed in Chapter 2. It is based on the assumption that all Growth Options will provide the same quantum of residential growth, with the five Growth Options merely differing in the location of the provision of growth. It does not assess a specific quantum of growth in any specific location.

Growth Option 4 is currently the best option as there is certainty that it is entirely located outside of the zone of influence for recreational pressures at Ashdown Forest SAC/SPA (i.e. located well beyond 9 km from the SAC/SPA), because of this it will not contribute significantly to increased recreational pressure at Ashdown Forest SAC/SPA and would not require provision of avoidance contributions.

Similar to Growth Option 4, Growth Option 5 will provide for all growth in one location. However, this location is not known. If this can also be provided well outside of the zone of influence for Ashdown Forest SAC/SPA then it is considered that this option would not contribute significant recreational pressure to Ashdown Forest and would not require provision of avoidance contributions. However, as the location of this Growth Option 5 has not been identified, there is potential for this option to be located within the zone of influence of the SAC/SPA (i.e. within approximately 9 km of the SAC/SPA). Due to the small portion of Tunbridge Wells Borough that is located within 9 km of Ashdown Forest and the numerous opportunities for any new settlement to be located entirely outside the recreational catchment of the SAC/SPA it is considered statistically unlikely that the new Garden Village will be located within this catchment.

As such, this Option could be equal to Option 4 as the most favourable one for Ashdown Forest SAC/SPA but that is entirely dependent on where in the borough it is located. Growth Options 1, 2 and 3 all provide for growth dispersed throughout the borough to a varying amount. All options are likely to provide differing amounts of growth within the zone of influence for recreational pressure on Ashdown Forest SAC/SPA (i.e. within less than 9 km of the SAC/SPA). The Issues and Options document does not provide sufficient detail to enable assessment as to which of the three Growth Options would contribute the most or least residential growth within all zones of influence (and thus result in an increase in recreational pressure upon the SAC/SPA). None of the options identify for growth within the inner zone (i.e. less than 7 km from the SAC/SPA). To ensure no likely significant effects result, in line with emerging strategic policy, new dwellings located within the zone of influence may require appropriate SANG and/ or SAMM provision.

### 3.2 Atmospheric pollution

Option 3 (and Option 5 if entirely located in the east) may be the most positive Growth Option with regard to its capacity to accommodate the greatest growth with the least effect on traffic flows past Ashdown Forest. It should be noted that this is a strictly relative comparison. For example, due to the distance of the key settlements in Tunbridge Wells Borough from Ashdown Forest c. 3,000 to c. 5,500 net new dwellings (depending on the distribution)<sup>12</sup> would be required in order to change vehicle flows within 200m of Ashdown Forest by more than 1,000 AADT. In air quality terms this is a fairly small change in flows. For example, Highways England would dismiss from further consideration a change in flows of less than 1,000 AADT as essentially air quality neutral.

It seems clear that Option 5, depending on location, presents the best opportunity to minimise impacts on Ashdown Forest SAC/SPA, with regard to both air quality and recreational pressure.

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<sup>12</sup> It is possible that significantly more dwellings than this could be accommodated with a new settlement situated in the east of the borough.

