

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 140,000m².

Yours sincerely,



Dr James Riley
Technical Director (HRA)
AECOM Limited
E: james.d.riley@aecom.com