TUNBRIDGE WELLS BOROUGH COUNCIL

LOCAL PLAN AND STRATEGY REVIEW

District priorities for nature and the wider environment from the local plan and other strategies

To note: The Environmental Improvement Plan 2023, Environmental goals, have been used to categorize the district's environmental targets in this review.

SECTION 1: THREATS AND PRESSURES ON THE NATURAL ENVIRONMENT

1.1 Development pressures (Local Plan, 2021)

A key issue is meeting the different and varied housing needs of a growing and ageing population

2A key challenge is meeting the housing needs of the borough. These are assessed, in line with national policy, as amounting to 678 per annum, equivalent to some 12,200 additional homes over the plan period to 2038.

A key issue is ensuring sufficient infrastructure is available to meet the needs of new development and support sustainable communities.

Plans must take account of, and where necessary to meet the needs of new development, required improvements in infrastructure, such as that needed for education, health, transport, flood and water management, and green and digital infrastructure.

It is recognised that there are different infrastructure needs for different settlements and parishes across the borough, such as flood mitigation, sport and recreation provision, and internet accessibility, especially in rural areas; these will need to be considered and addressed accordingly.

A key issue is development pressure on the High Weald AONB and the Green Belt

Together, the AONB and Green Belt cover 75% of the borough, with substantial overlaps.

It is recognised that pressure for new built development across the borough, including on greenfield land, could have direct impacts on landscape and environmental assets and their settings. Therefore, in facilitating development, full account needs to be taken of the landscape and environmental sensitivities of each site, as well as respecting local distinctiveness and providing for enhancements.

1.2 Flood Risk (Local Plan, 2021)

A key issue is ensuring growth can be accommodated without further risk to areas vulnerable to flooding and, if possible, to provide betterment

Parts of the borough are located in flood risk areas. The Council's Tunbridge Wells Strategic Flood Risk Assessment (SFRA) provides information and guidance on flood risk, as well as identifying the strategic parcels of land across the borough identified to be at risk of flooding. This includes areas to the north and west of Paddock Wood which are particularly prone to flooding. A key issue is therefore

ensuring that the proposed growth strategy can be accommodated without further harm and risk to areas that are vulnerable to flooding, to provide betterment.

1.3 Transport (Local Plan, 2021)

The borough faces significant transport challenges, particularly in terms of managing existing congestion and future growth, as well as needing to respond to the impacts of air quality and climate change.

1.4 Economic (Local Plan, 2021)

It is recognised that economic uncertainty may also put pressure on, and result in the loss of, rural shops and services in village and other local centres, which provide an important supporting role at the heart of communities.

While the area remains an attractive business location with good prospects for growth, opportunities need to be provided in both the urban and rural areas across the borough to actively facilitate future business growth and expansion, which in turn will create local job opportunities

SECTION 2: TARGETS AND PRIORITIES FOR NATURE RECOVERY (GOAL 1)

Unless otherwise stated, the following information in section 2 came from the Tunbridge Wells Local Plan, 2021.

2.1 PROTECTING HABITATS

2.1.1 Site designations

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 minimise 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*

Targets:

•No deterioration in the condition of SSSI's (SSSI condition monitoring)

•Maintain percentage of land cover of designated sites (monitoring coverage)

Ashdown Forest (Protecting Ashdown Forest):

The Ashdown Forest Special Protection Area and Special Area of Conservation is a European-designated nature conservation site is in East Sussex however in order to help protect the nature conservation interests of Ashdown Forest there are particular requirements for planning and how planning applications are assessed.

Policy EN 11 - Ashdown Forest Special Protection Area and Special Area of Conservation

> *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.*

Target: Achieve targets set out in SAMMS projects (implementation and monitoring of projects). SAMM Strategy

The borough supports a wide network of biodiversity sites, including 10 Sites of Special Scientific Interest, 60 Local Wildlife Sites, 16 Sites of Local Nature Conservation Value, 13 Roadside Nature Reserves, and four Local Nature Reserves. Protected and scarce species and habitats should not be adversely affected by development, and there should be net gains for nature.

2.1.2 High Weald National Landscape

Vision & Strategic Objectives 2: To conserve and enhance the valued historic, built, and natural environments of the borough, including the High Weald Area of Outstanding Natural Beauty, and to achieve net gains for nature;

Policy EN 19 - The High Weald Area of Outstanding Natural Beauty

> *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.

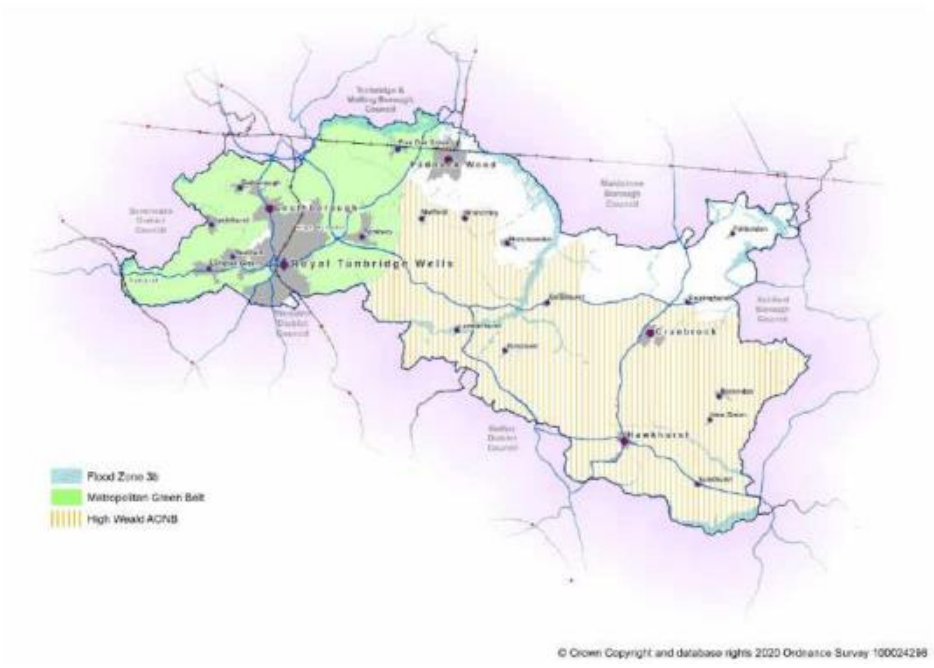
It will need to:
1. Be sensitive to the topography and landscape features of the location;
2. Improve where possible connections between settlements and countryside through the provision of high quality green infrastructure
3. Where present, protect, enhance, and restore key characteristics of historic routeways;
4. Retain and support the distinctiveness of individual settlements and their key characteristics;
5. Help restore the natural functioning of watercourses;
6. Improve the management of associated agricultural land, woodland, and heaths;
7. Where possible and appropriate, improve public access to the countryside, providing way marking 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.

Targets:

- Retention of essential character of High Weald AONB and support of Policy EN 19 at appeal-65% or more appeal decisions
- Support TWBC conclusion on Policy EN 19 (if relevant to appeal) and Monitoring of the AONB Management Plan

Figure 3 Borough Overview



2.1.3 Green Belt

A key issue/challenge: Green Belt, conserving and enhancing the borough's recognised heritage and environmental assets, and achieving net gains for nature

Vision & Strategic Objectives 2:

- To ensure that the Green Belt continues to meet its purposes, only releasing land where strict tests are met.

Policy STR 9- Green Belt

> *An effective Green Belt will be maintained through the application of national planning policy and relevant policies 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 released are set out in the relevant place shaping policies and include requirements to secure improvements to the environmental quality and accessibility of the surrounding Green Belt.*

The eastern extent of the Green Belt in Kent extends to the east of Royal Tunbridge Wells and the west of Paddock Wood; and the southern extent, to the south of Royal Tunbridge Wells, follows the borough boundary; as such it extends around the built-up area of Royal Tunbridge Wells and Southborough. A number of smaller settlements within the western part of the borough have had their LBDs defined by the Green Belt designation, including Bidborough, Rusthall, Five Oak Green, Langton Green, Pembury, and Speldhurst.

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open to maintain the character of the Green Belt. Once established, Green Belt boundaries should only be altered in exceptional circumstances and should be fully evidenced and justified, through the preparation or updating of a Local Plan.

The Council considers that there are the exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation for the proposed development at Tudeley Village, Paddock Wood (including land at east Capel), at a few sites around Royal Tunbridge Wells (particularly at North Farm/Kingstanding Way), and at Pembury, and also alterations at Southborough, Speldhurst, and Langton Green.

The Site Allocations Local Plan (2016) identified some areas as long-term land reserves (Site Allocations Policy AL/GB 4); these are referred to as Rural Fringe sites in the Site Allocations Local Plan. These are sites that were removed from the Green Belt in order to be able to provide a land reserve to meet the future development requirements of the borough. All of these areas are located outside of the LBD. However, all areas are used for educational or recreational purposes (including allotments), have planning permission for residential development, or are allocations in this Local Plan, as shown in Table 7. Therefore, future proposals for development on the educational or recreational sites will be assessed against the relevant policies in this Local Plan, with regard being had to the need to ensure that there remains sufficient education and recreational infrastructure in Royal Tunbridge Wells and Rusthall.

Target: Protect Green Belt form inappropriate development- 65% or more appeal decisions support TWBC conclusion on Policy STR 9 (if relevant to appeal)

2.1.4 Rural Landscape

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 is a rich heritage of attractive lanes throughout the borough that contribute significantly to the distinctive character of the countryside, while also providing wildlife habitats. Reference should be made to the Council's adopted Supplementary Planning Guidance: Rural Lanes and the High Weald AONB Joint Advisory Committee data set for historic routeways (and any subsequent revisions): it is recognised that the Rural Lanes SPG is now of considerable age, and will be reviewed in due course.

The borough has a diverse and distinctive landscape formed by a patchwork of agricultural land, woodland, heathland, meadows, and rural settlement, superimposed upon a landform of rolling plateaux incised by thin ghyll valleys and wide river valley floodplains. It is predominantly a rural, agricultural landscape of grazed pastures and arable fields, highlighted with broad belts of orchards, and now only occasional hop gardens, set within a framework of extensive woodlands. The landscape presents a peaceful and tranquil character, often with a sense of remoteness, which belies its location in the populous south east of England. The strong wooded framework is provided by the upland blankets of coniferous plantation, ghyll woodlands nestled in the valleys, and woodland shaw boundaries that knit the various agricultural landscapes together.

Target: Protection of rural landscapes-5% or more appeal decisions support TWBC conclusion on Policy EN 18 (if relevant to appeal)

2.1.5 Agricultural Land

Policy EN 20 - Agricultural Land

> *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 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.*

While it is important to use areas of poorer quality agricultural land in preference to that of higher quality, it can be seen that 'quality' may be determined by more than the ALC grade, and the 'economic and other benefits' such as infrastructure, fragmentation, and access, as well as the contribution land may make to wider ecosystem services and natural capital are important considerations in relation to the effects of development on agricultural land. Natural capital is "that part of nature which directly or indirectly underpins value to people, including ecosystems, species, freshwater, soils, minerals, the air and oceans, as well as natural process and function". Policy EN 20 takes account of these factor

Target: Retention of 'best and most versatile' agricultural land-Hectares of 'best and most versatile' land which would be lost as a result of large-scale development on sites greater than 20 hectares

2.1.6 Trees, Woodland & Hedges

The borough is largely characterised by an abundant amount of tree cover in both the rural (22% woodland cover) and urban areas (with nearly 34% tree cover in Royal Tunbridge Wells itself), including extensive areas of woodland (a large number of which are of ancient origin), together with numerous small woodlands, copses, hedgerows, individual trees, garden trees, and street trees. The trees form a unifying element that eases the visual transformation between land use types, as well as defining ridgelines, contributing to local character, forming structure for green space, providing wildlife corridors, creating reservoirs for biodiversity, intercepting rainfall, and helping to reduce flood risk.

The borough is rich in ancient semi-natural woodland (ASNW), aged and veteran trees, and trees in historic parks and gardens, all of which can be classed as heritage assets. Tunbridge Wells borough has the largest area of ASNW in Kent, being 16.22% of the total land area. The Council will seek to prevent loss of, and to enhance, woodland cover, working proactively with woodland owners and relevant organisations to bring woodland back into management where possible. In the absence of site surveys and detailed assessments, the Council will assume a buffer of 25m from the edge of the woodland, which allows for the presence of veteran trees and the fall height of mature trees. The Council expects developers, through assessment, to confirm that this or any other distance is appropriate and that the priority for such buffers will be ecological mitigation and enhancement for the woodland rather than the amenity of the proposed development

Targets:

- Strong protection of trees and hedges – 65% or more appeals rejected to TPO works and protected and protected hedgerows dismissed
- Retention of ancient woodland and support of Policy EN 13 at appeal-65% or more appeal decisions support TWBC conclusion on Policy EN 13 (if relevant to appeal)

Harm to irreplaceable habitats, including ancient woodland, should be avoided and they cannot be included in metric calculations for any gain or loss. Any effects, either positive or negative, on ancient woodland will be considered in accordance with the policy for ancient woodland.

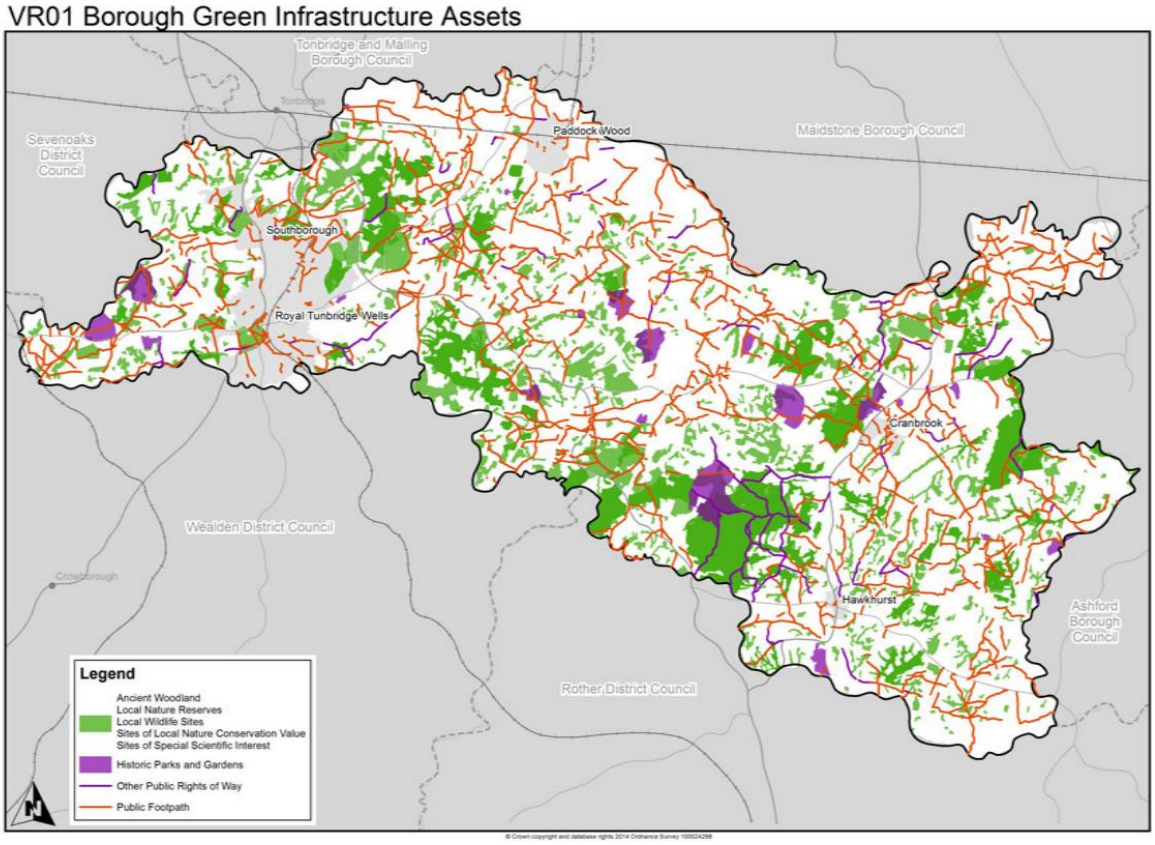
2.1.7 Green Infrastructure Network

There is a wealth of existing green infrastructure across the borough in both the rural and urban areas which is described in more detail in the Green Infrastructure Framework, but elements of GI that characterise the borough include:

- Extensive areas of ancient woodland (16.3% land cover for the borough)
- Large blocks of forested land with public access at Bedgebury, Pembury, Cranbrook and Benenden

- Around 40 sites designated as Historic Park and Garden that contain extensive areas of parkland and gardens
- Large areas of Common land at Royal Tunbridge Wells and Rusthall, Southborough and Lamberhurst the Down
- More than 4,000 hectares of land designated for its value to wildlife
- Significant rivers and streams including the Bewl and Teise which cut through the borough and the Rivers Medway and Rother bordering the borough and drainage channels such as the Hammer Stream and Hexden Channel
- An intricate network of steep sided and wooded gill stream across the High Weald
- A high density of ponds (many of historic origin) and a number of notable modern ornamental/fishing lakes
- Townscape with extensive tree cover from gardens and street trees

(Infrastructure Delivery Plan, 2014)



(Green infrastructure Plan, 2014)

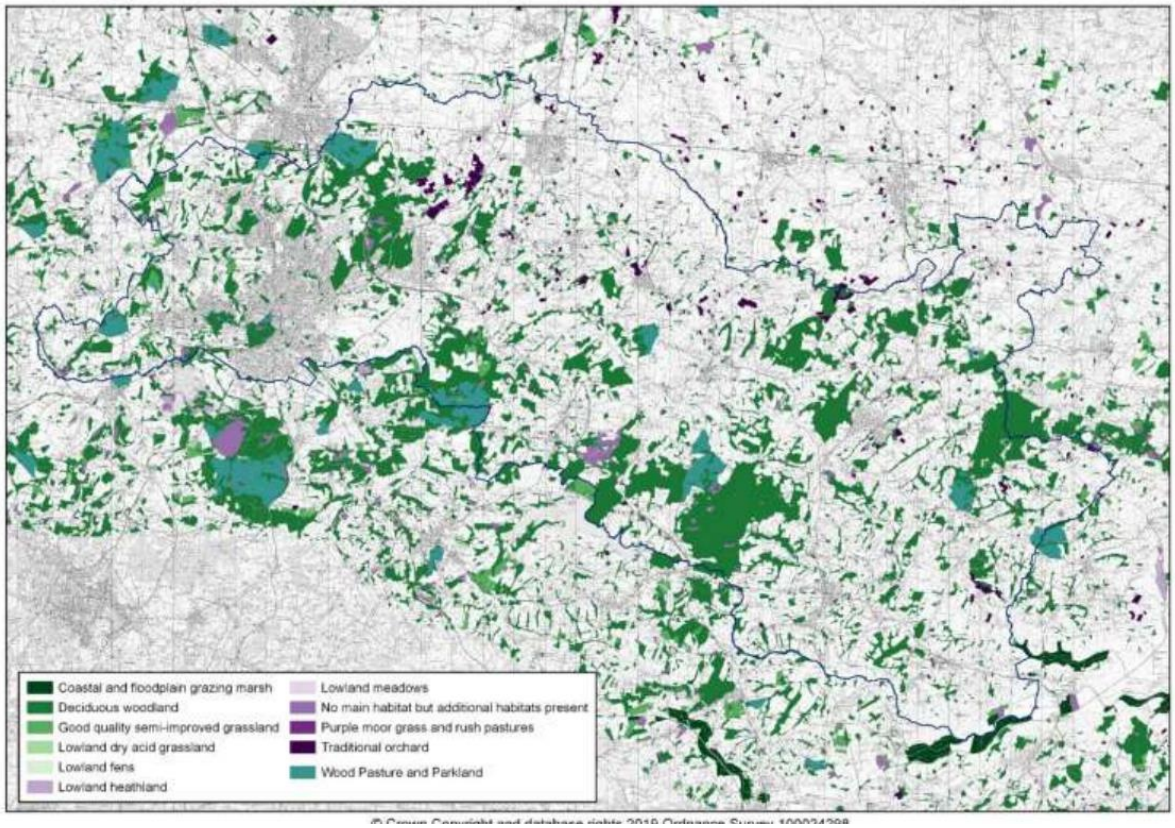
2.1.8 Local Green Space

Target: No loss of local green space-Quality pg LGS across the borough

2.1.9 **Priority Habitats** Lowland Meadows

- Lowland dry acid grassland
- Lowland Heath
- Built up areas and gardens
- Hedgerows
- Lowland woodland pasture
- Historic Parkland

(Biodiversity Action Plan, 2008)



(Green Infrastructure Plan, 2021)

2.1.10 **Habitats of Local Significance** (Biodiversity Action Plan, 2008)

- Rocky outcrops
- Gill woodlands

2.1.11 Protection from the negative impacts of development and infrastructure

Policy EN 12 - Trees, Woodland, 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; 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
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.

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 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 trees, 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*

Vision and Strategic Objectives 1: Development should help achieve the Council's goal of carbon neutrality for the borough by 2030. It should also help to conserve and enhance the borough's recognised heritage and environmental assets. All development should be of high-quality design that respects local identity and character.

Vision and Strategic Objectives 2 :

Strategic Objectives
1. To ensure sustainable development that contributes to both meeting housing, economic, and social needs and to conserving and enhancing the highly valued environmental qualities and amenities of the borough;
3. To establish the role that garden settlements can make to the future delivery of development in the borough and to ensure such proposals create very high-quality living environments;
4. To promote high-quality and well-designed development that contributes to the local identity and character and creates attractive environments;
11. To work with local communities to secure sustainable development to meet local needs, with due regard to neighbourhood plans where appropriate.

Policy STR 1 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

Classes B and E) 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, transformational expansion of Paddock Wood (including land at east Capel), following garden settlement principles and providing flood risk solutions; and b. the creation of a new garden settlement: Tudeley Village between Paddock Wood and Tonbridge;
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 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.

Policy EN 24 -Water Supply, Quality, and Conservation

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 ground water and surface water levels that result in adverse impacts on:
a. adjoining land; and/or
b. existing abstractions, amenity uses, natural habitats, or agricultural activities, including fisheries; and/or
c. the quality of ground water resources or potential ground water resources; and/or
d. river flows or the potential yield of ground water resources.

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.

2.2 RESTORING AND ENHANCING HABITATS

2.2.1 Green, Grey and Blue Infrastructure

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 ecological 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
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
the addition of bird and bat boxes for urban species as indicated in Policy EN 9: Biodiversity Net Gain.

Target: Increase in managed Green Infrastructure- Area of land controlled under Landscape and Ecology Management Plans (LEMPs)

Barnett's Wood and Knight's Park (Green Infrastructure Plan, 2021):

The Landscape Character Assessment and Capacity Study (2009) identified some areas of poor landscape quality within the Borough, such as parts of Barnett's Wood and Knight's Park in Royal Tunbridge Wells, which have become degraded. It also identified other opportunities for strengthening landscape characteristics. Green infrastructure provision could offer an opportunity to make these improvements.

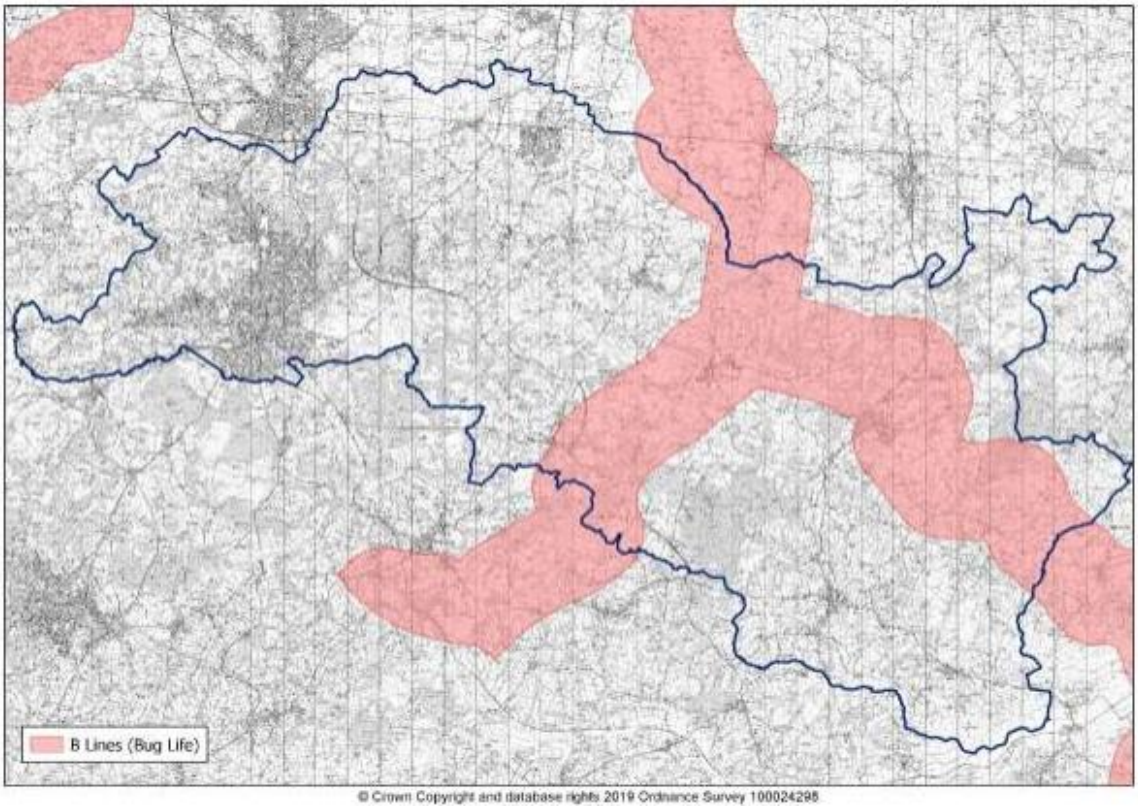
Buglife B-lines in Tunbridge Wells borough (Green Infrastructure Plan, 2021):

Across the UK, with the contribution of stakeholders (e.g. farmers, land owners, wildlife organisations, businesses, local authorities and the general public), a 'BLines Map' has been produced which draws green corridors across the landscape, from which key pollinating species' travel is prioritised.

It is stated that within these B-Lines, a series of wildflower-rich habitat stepping stones are being restored and created (aimed for at least 150,000 hectares across the UK) to link existing wildlife areas together and create a functioning network (see B-Lines Hub (Buglife)).

Identified benefits of the B-Lines initiative include :
1) helping to conserve native pollinators and a range of other wildlife, and contributing towards biodiversity targets,
2) helping wildlife respond to climate change by making it easier for them to move around,
3) increasing the number of insect pollinators and the benefits these bring to the farming sector (pollination being an important 'ecosystem service'),
4) bringing nature to people, and
5) giving opportunities for everyone to play their part and help create the B-Lines network.

The B-Lines map shows the B-Lines corridor for the Tunbridge Wells borough. The Council supports this initiative and has made specific contributions to pollinator projects through work on the Commons and through Tunbridge Wells in Bloom and would like to see work on GI making a positive contribution to this strategy.



2.2.2 Biodiversity Opportunity Areas (BOAs) (Green Infrastructure Plan, 2021)

Although not a designation, as part of the Kent Biodiversity Strategy, the Kent Nature Partnership has also identified three general Biodiversity Opportunity Areas (BOAs) across the borough, covering the High Weald, Romney Marshes, and the Medway and Low Weald Grassland and Wetland that extend further beyond the borough boundaries. These BOAs indicate where the delivery of Kent Biodiversity Strategy targets should be focused in order to secure the maximum biodiversity benefits arising from habitat enhancement, restoration, and recreation.

<u>Biodiversity Opportunity Area Targets: High Weald</u>

- Restore, recreate and enhance woodland through active conservation management, particularly locally unique gill woodlands, heathy woodlands and wood pasture. Restore plantations on ancient woodland sites to native woodland.
- Secure the appropriate conservation management of all existing Lowland Meadows. Enhance at least 100ha of species-rich neutral grassland to bring it to UK BAP priority habitat Lowland Meadow quality. Pursue opportunities to create new species-rich neutral grassland where this will contribute to meeting the county-wide target of 37ha, in blocks of 2ha or more, by 2020.
- Reinforce the intricate matrix of habitats by restoring and recreating heathland, acid grassland, and neutral grassland, and reconnecting fragmented woodlands. Opportunities should be taken for heathland or acid

grassland restoration and enhancement as part of woodland management, for example at Bedgebury Forest and Hemsted Forest and in the Pembury area. Additional opportunities for creation of acid grassland and heathland should be pursued where this would contribute to the county-wide target of creating up to 28ha by 2020.

- Pursue other opportunities to create new acid grassland and heathland, of up to 20ha in blocks of at least 1ha and no more than 500m from other existing or new semi-natural habitat. Enhance at least 10ha of species-rich acid grassland to bring it to UK BAP priority habitat Lowland Acid Grassland quality.
- Maintain and restore water courses, achieving a quantifiable improvement in ecological status as judged by Water Framework Directive indicators and maintain, restore and create ponds.
- Action for naturally widely dispersed habitats (ponds, traditional orchards), wildlife associated with arable farmland, and widely dispersed species such as great crested newt will need to focus across the whole of the area and not just within the Biodiversity Opportunity Area boundary.

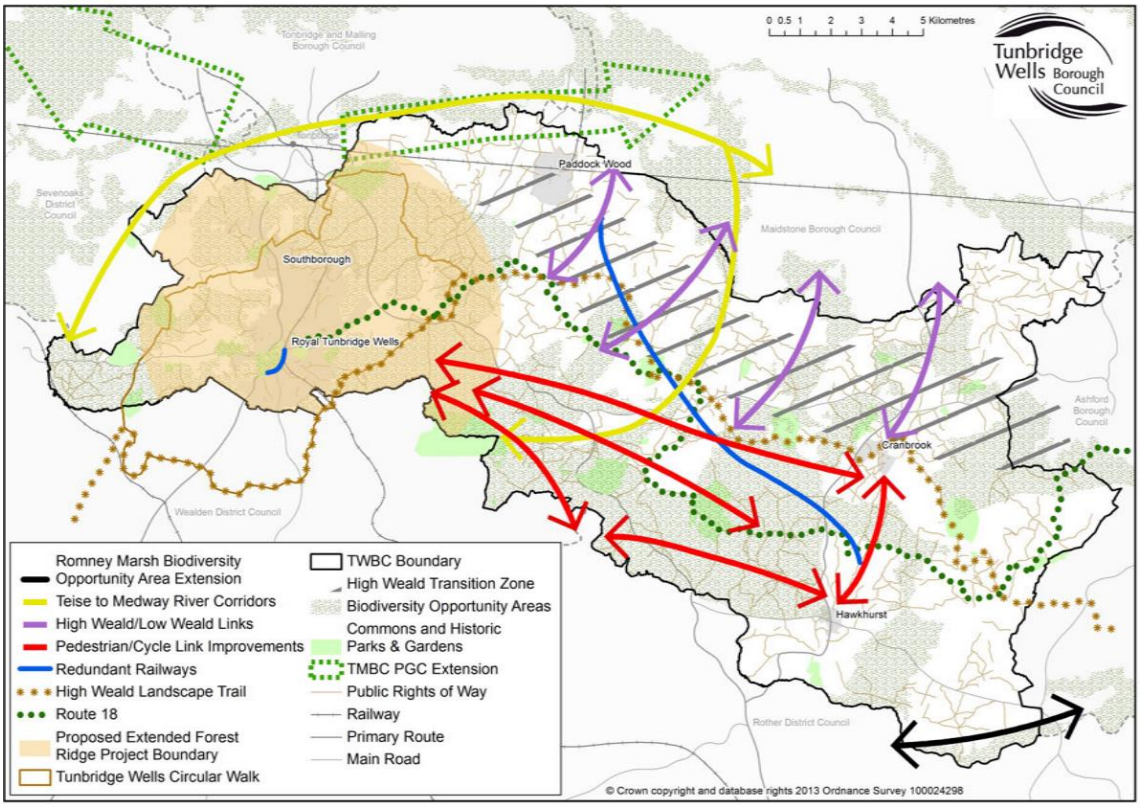
Biodiversity Opportunity Area Targets: Medway & Low Weald Wetlands & Grasslands

The Medway & Low Weald Wetlands and Grasslands BOA has a focus on river systems of the Low Weald and is mainly to the north of the borough in small sections falling within the river corridors and flood plain of the Medway and Teise and so will be of particular relevance to those parts of the borough that fall within the Low Weald and GI proposals associated with river corridors

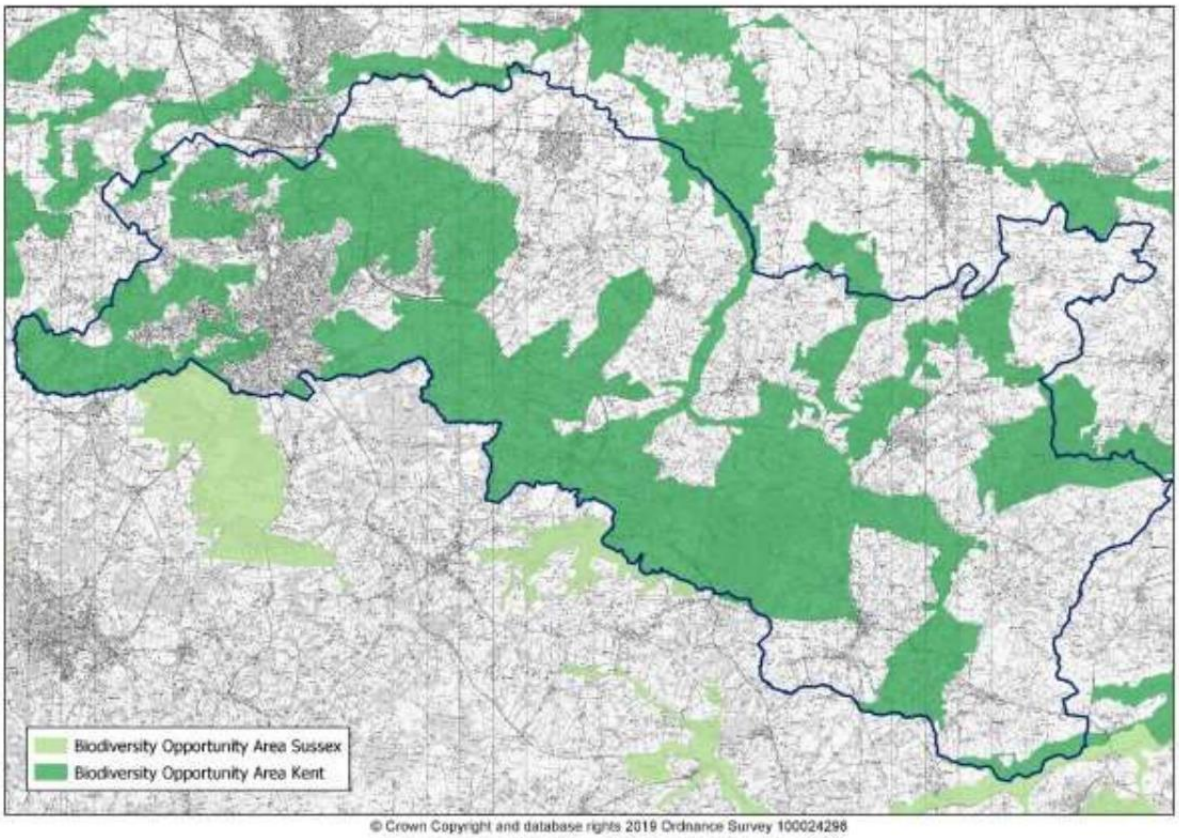
Biodiversity Opportunity Area Targets: Romney Marsh & Rye Bay

There is also a small section of the Romney Marsh and Rye Bay BOA that straddles the border with Rother District. This will also be supported by the Council where appropriate.

Proposed GI improvements (Green Infrastructure Plan, 2014):



Map showing Sussex and Kent Biodiversity Opportunity Areas (Green Infrastructure Plan,2021:



2.2.3 Within development and infrastructure

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 runoff, exceeding greenfield runoff rates (mimic natural flows and drainage pathways) and ensure that surface water runoff should be managed as close to its source as possible.

2.3 HABITAT CREATION

2.3.1 Habitat Action Plan (Biodiversity Action Plan, 2008)

Lowland Meadow:
• Halt the loss of species-rich grassland
• Restore, maintain and enhance species-rich grassland (200 hectares, sites not all verified)
• Increase the overall extent of lowland meadows and reduce habitat fragmentation, i.e. adjacent to existing meadows
• Improve habitat connectivity on a landscape level
• Create, where appropriate, new species-rich grassland, i.e. on historical sites

Lowland Acid Grassland:
• Halt the loss of acid grassland
• Restore, maintain and enhance acid grassland
• Increase the overall extent of acid grassland and reduce habitat fragmentation, i.e. adjacent to existing meadows
• Improve habitat connectivity on a landscape level
• Create, where appropriate, new acid grasslands, i.e. on historical sites

Lowland Heath:
• Halt the loss of areas of heathland
• Achieve favourable management of heathland
• Maintain and enhance existing heathlands
• Actively seek opportunities to extend the existing heaths
• Create new areas of heathland where appropriate
• Improve habitat connectivity on a landscape level

Built up Areas and Gardens:
• Maintain and enhance the current extent of natural and semi-natural habitats within built up areas and gardens • Actively involve the local community in safeguarding their local environment
• Actively seek opportunities to extend and improve green areas to improve habitat connectivity, particularly on a landscape level
• Ensure that biodiversity is firmly embedded in the planning process and other borough strategies, policies

Hedgerows;
• Halt the loss of ancient/species rich hedgerows
• Encourage favourable management of all hedgerows
• Create new local native hedgerows in appropriate areas, targeting habitat connectivity

Lowland Wood Pasture and Historic Parkland:
• Halt the loss and degradation of historic parkland and pasture woodland
• Achieve favourable conservation condition of all historic parkland and pasture woodland
• Create new areas of habitats, where appropriate, focusing on diminishing fragmentation

Rocky outcrops:
• Identify and assess the distribution extent and current quality of this unique habitat
• Manage human activities, which may cause damage to significant sandstone outcrops
• Halt the loss and degradation of significant rocky outcrops
• Maintain the extent of gill rocky outcrops
• Achieve favourable conservation condition of all significant rocky outcrops

Gill Woodland (wet woodland):
• Identify and assess the distribution extent and current quality of this unique habitat
• Halt the loss and degradation of gill woodland
• Maintain the extent of gill woodlands
• Encourage favourable conservation condition of all gill woodlands
• Improve habitat connectivity
• Ensure the requirements of all priority species associated with gill woodlands are met

2.3.2 Green and Infrastructure (Green Infrastructure Plan, 2014)

Ashdown Forest:
Cross-boundary Management Plan for Ashdown Forest, which is situated within Wealden District. It is also anticipated that some areas of accessible natural or semi-natural green space could be created in and around Royal Tunbridge Wells to

alleviate pressure on Ashdown Forest. It is anticipated that the provision of green infrastructure within new developments, new areas of natural or semi-natural greenspace, and enhanced linkages across the Borough in general, can provide opportunities for biodiversity enhancement.

River Corridors:
The aims of the River Basin Management Plans and of green infrastructure planning are mutually reinforcing. Improving the quality of rivers and other water bodies contributes to the conservation and enhancement of biodiversity, one of the key functions of green infrastructure, and river corridors can also act as green infrastructure corridors and provide pedestrian, cycling and equestrian links and opportunities for recreation. Developing green infrastructure networks can in turn help to reduce water pollution, thus contributing towards meeting targets for water quality.

Where opportunities arise, enhancement of river corridors will be undertaken, which could include re-naturalisation of river corridors through establishing wide, semi-natural margins along at least one bank and 'daylighting' (i.e. removing defunct culverts) or the removal of redundant structures. Re-naturalisation can also have flood risk and biodiversity benefits.

The River Medway Catchment Flood Management Plan (2009) also notes that the provision of flood storage space in the Upper Medway catchment provides the opportunity for biodiversity and habitat creation and enhancement. Information is not, however, currently readily available by local authority area.

As identified in the Borough Council's Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 (2007 and 2009), there are some problem areas within the Borough in terms of flood zones, in particular in Paddock Wood and Lamberhurst. Green infrastructure can provide opportunities to reduce flooding by providing spaces to collect flood water, known as flood attenuation zones, or by allowing rainwater to soak away gradually rather than gather on impermeable surfaces, thus moderating the volume of water arriving in drainage systems. Paddock Wood was identified within the SFRA Level 2 as an 'area of critical drainage' and consequently a Surface Water Management Plan (SWMP) for the area has been produced. The aim of the SWMP, with regard to contributing towards green infrastructure, is to identify suitable areas within Paddock Wood in which appropriate sustainable drainage systems (SUDS) can be implemented to help mitigate the risk of surface water flooding.

Green and Blue Infrastructure Proposals:

Green Infrastructure Proposals which fulfil the functions required for the borough. It shows that, in combination, the proposals have the potential to fulfil all green infrastructure functions. Table 3 Appraisal of options against green infrastructure functions.

Proposal	A Enhancing biodiversity	B Creating sense of place	C Access and healthy living	D Water and flooding	E Climate change	F Transport, education, crime reduction	G Food and fuel
Infrastructure within new developments	✓	✓	✓	✓	✓		✓
1. Extension of Forest Ridge Project	✓	✓	✓		✓	✓	✓
2. High Weald/Low Weald Links	✓	✓	✓			✓	
3. Teise to Medway River Corridors	✓	✓	✓	✓	✓	✓	
4. Extension of Romney Marsh Biodiversity Opportunity Area	✓			✓	✓		
5. Enhancement of links between key tourist attractions and settlements		✓	✓			✓	
6. High Weald Transition Zone - strengthening National Character Area	✓	✓					
7. Redundant railways	✓	✓	✓			✓	
8. Surface Water Management Plan outcomes	✓			✓	✓		

The proposals have been categorised in this Plan as being of high, medium and low priority, as follows:

<u>High priority</u>

- Green infrastructure within new developments

- Proposal 1: Extension of Forest Ridge Project

- Proposal 8: Surface Water Management Plan Outcomes

<u>Medium priority</u>

- Proposal 3: Teise to Medway River Corridors

- Proposal 5: Enhancement of links between key tourist attractions and settlements

<u>Low priority</u>

- Proposal 2: High Weald/Low Weald Links

- Proposal 4: Extension of Romney Marsh Biodiversity Opportunity Area

- Proposal 6: High Weald Transition Zone - strengthening National Character Area

- Proposal 7: Redundant railways

2.3.3 Within development and infrastructure

Policy EN 1 Sustainable Design

1. 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;

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 to ensure development supports a path to net zero emissions by 2030;

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 reuse or recycling of waste. For all development, sending waste to landfill must be a last resort;

12. Proposals should encourage positive behaviour change, such as provision of drinking fountains in public realm developments to discourage purchase of single use plastic.

2. 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 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.

4. 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.

5. 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.

6. 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.

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 Tunbridge Wells Borough Local Plan 357 Submission Local Plan 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 off-site 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 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.

Target: Net gains in biodiversity in developments-Number of biodiversity units lost or gained as part of major developments

2.4 SPECIES SPECIFIC

SECTION 3: WIDER ENVIRONMENTAL BENEFITS

3.1 GOAL 2: AIR QUALITY (Local Plan, 2021)

Currently, there is one AQMA declared in the borough due to exceedances of the annual mean Air Quality Strategy (AQS) objective for nitrogen dioxide (NO2). The AQMA is located in Royal Tunbridge Wells and Southborough, and currently includes the A26 between Park Road and Nevill Terrace, and also Grosvenor Road, all at a distance of 0-30m from the centre of the carriageway.

In the case of Tunbridge Wells borough, an AQMA was first declared in 2005, based on an exceedance of the NO2 annual mean objective of 40µgm3 .

At the time of writing, the Borough Council was in the process of declaring a second AQMA in the borough in Hawkhurst. This AQMA will be located on the northern arm of the crossroads on Cranbrook Road.

The largest contributors to carbon dioxide emissions in the borough are domestic gas (22%), A-roads (21%), industrial and commercial electricity (15%), minor roads (14%), and domestic electricity (12%). These five sectors have been the dominant emission sources since 2005 and this trend is likely to continue into the near future (albeit to varying degrees as the Government phases out gas heating and petrol/diesel vehicles and progresses with grid decarbonisation).

3.2 GOAL 3: CLEAN AND PLENTIFUL WATER (Local Plan, 2021)

Policy STR 5- Infrastructure and Connectivity

> *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 South East 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.*

Policy EN 24 -Water Supply, Quality, and Conservation

> *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.*

In terms of water conservation, all development must be planned positively to minimise its impact on water resources. This includes: i. minimising use of mains water; ii. incorporating water saving measures, such as rainwater harvesting and greywater recycling systems (in both new development and by retrofitting existing buildings).

3.3 GOAL 4: MANAGING EXPOSURE TO CHEMICALS AND PESTICIDES (Local Plan, 2021)

The Council holds a wide range of data on potential sources of contamination, such as historic land use, planning history, pollution incidents, details of closed landfill sites, and site-specific reports on investigation and remediation. Further information and guidance can be found on the Council's website (see Environment issues). The NPPF advises that planning policies and decisions should contribute to, and enhance, the natural and local environment through the remediation and mitigation of despoiled, degraded, derelict, contaminated, or unstable land. This guidance places onus on the developer and/or landowner for securing safe land/development free from pollution. It also requires that investigations and a risk assessment of land potentially affected by contamination be undertaken by a suitably qualified competent person (as defined by the NPPF) in accordance with established practices such as BS10175 (2017) 'Code of Practice for the Investigation of Potentially Contaminated Sites' (or any subsequent version).

3.4 GOAL 5: MAXIMISE OUR RESOURCES, MINIMISE OUR WASTE (Local Plan, 2021)

Policy STR 5- infrastructure and Connectivity

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.

3.5 GOAL 6: USING RESOURCES FROM NATURE SUSTAINABLY (Local Plan, 2021)

High quality, low carbon, and sustainable design can help respond to the challenges of climate change, improve the quality of the natural and built environment, attract business and investment, promote good health and wellbeing, and reinforce civic pride and a sense of place.

3.6 GOAL 7: MITIGATING AND ADAPTING TO CLIMATE CHANGE

Proposed actions and targets to reduce the impact of Climate change on our biodiversity (Biodiversity Action Plan,2008):

- To work together in partnerships to create the habitat connectivity essential for our biodiversity.
- To reduce the pressure on biodiversity, eg by encouraging landowners to manage their land less intensively.
- To halt further habitat fragmentation.
- To aid species dispersal through ensuring a habitat matrix exists and increasing connectivity on a landscape scale for target habitats and species.
- To take proactive measures to protect endangered habitats and species and facilitate their movement, eg creating suitable migratory habitats, networks and stop off points (wildlife friendly margins, hedgerows, small copses and ponds).
- To focus local action on functioning habitat connectivity, stepping stones, buffers, links, viability and network.
- To provide local biodiversity LHAP/LBAP Champions.
- To communicate climate change and its impact to the people in our borough.
- To continue with on-going research, monitoring and evaluation

Local plan,2021:

As a result of climate change, there will also be a need for the borough to adapt to hotter, drier summers and warmer, wetter winters. These changing circumstances need to be reflected within the design of buildings and flood alleviation, including from surface water runoff. The borough is also within an area of ‘water stress’, which will intensify as a result of climate change, and so ways of reducing water consumption need to be considered.

The total CO2 emissions for the borough in 2018 was 3.5 tonnes per capita, which is lower than the county and country figures of 5.0 and 5.2 tonnes per capita respectively. This is largely a result of the lack of motorways or big industry in the borough.

The largest contributors to CO2 emissions in the borough are domestic gas (22%), A-roads (21%), industrial and commercial electricity (15%), minor roads (14%), and domestic electricity (12%). These five sectors have been the dominant emission sources since 2005 and this trend is likely to continue, albeit to varying degrees as the Government phases out gas heating and progresses with grid decarbonisation and the promotion of electric vehicles.

Vision & Strategic Objective 2 (Local plan, 2021):

10. To support the goal to make the borough carbon neutral by 2030, and minimise the impact of climate change on communities, the economy, and the environment;

Policy STR 5- infrastructure and Connectivity (Local plan, 2021)

Water

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.

Policy STR 7 - Climate Change (Local plan, 2021)

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 runoff through the use of permeable 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 EN 3 - Climate Change Mitigation and Adaptation (Local plan, 2021)

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
2. Reduction in flood risk and provision of infrastructure to protect vulnerable communities and habitats, and minimisation of water consumption.
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

3.7 GOAL 8: REDUCE RISK OF HARM FROM ENVIRONMENTAL HAZARDS

3.8 GOAL 9: ENHANCE BIOSECURITY

3.9 GOAL 10: ENHANCE BEAUTY, HERITAGE AND ENGAGEMENT WITH THE NATURAL ENVIRONMENT

3.9.1 Enhance Beauty (Local plan, 2021)

The borough's settlements sit within a countryside setting that is both distinctive and formally recognised for its value. Indeed, where settlements fall within the High Weald AONB, which covers much of the borough, they contribute to its historic landscape character. At the same time, it is also a living and working countryside, supporting a strong rural economy, including agriculture, recreation, and tourism.

The countryside of the western parts of the borough also falls within the Green Belt, which plays a part in maintaining the individual identities of local towns and villages, as well as in managing the growth of Greater London.

3.9.2 Heritage (Local plan, 2021)

Heritage assets are buildings, monuments, structures, sites, places, areas, whole landscapes, or elements of landscapes, identified nationally and locally as valued components of the historic character of the borough. They can include designated heritage assets and non-designated heritage assets identified by the Council as being of local historic importance (including local heritage assets or those identified during the determination of planning applications).

Designated heritage assets are protected by national policy and legislation, and in the borough these include: listed buildings; conservation areas; scheduled monuments; archaeological sites; registered historic parks and gardens; ancient semi-natural woodland; veteran trees.

Tunbridge Wells borough has a rich and diverse built heritage, including a large number of heritage assets, all set within its historic towns and villages, a well-preserved medieval and pre-medieval landscape (dating back to Palaeolithic, Mesolithic, and Neolithic periods) of dispersed settlements, ancient routeways, ancient woodland, veteran trees, farmland, and farmsteads. A high percentage of the borough falls within the High Weald AONB, which is recognised as an important medieval landscape. Many of the heritage assets are identified as components of the natural beauty of the AONB.

In terms of the built environment, the borough has some of the highest numbers of heritage assets in the South East, which together provide a resource that contributes to creating a sense of place that should be passed on to future generations. Conservation and enhancement of heritage assets and their settings, such as listed buildings, conservation areas, Scheduled Ancient Monuments, and historic parks and gardens, will therefore be central to the Council's approach to the environment.

There are four broad character areas in the borough, within which each settlement sits, and these have many common themes:

•The south and south east of the borough contain typical Wealden settlements, which are intimate, small-scale, and formed of dens and hursts, characteristic of the AONB's components of natural beauty.

•Cranbrook, historically the centre of the wool trade in the borough, is the central settlement in this area.

•Paddock Wood is a distinct settlement, which is identifiable as a historic railway-focused town, located in the transition area between the Low and High Weald, at the foot of the scarp slope.

•Finally, Royal Tunbridge Wells - celebrated socially, economically, and culturally for its history of leisure as a purpose-designed 'new' spa town with intricate streets and a concentrated historic core.

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.*

3.9.3 Access to nature

Policy STR 5- infrastructure and connectivity (Local plan, 2021):

> *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, 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.*

Policy STR 6 - Transport and Parking

> *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 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. 0Such 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 and 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 (including footpaths, bridleways, and byways) for users of non-motorised transport. This will include links to destinations outside the borough, including Tonbridge;

4. The provision of improved cycle parking and e-bike charging points and bike share opportunities.

3.9.4 Connection with Nature (LCWIP, 2021)

Local Cycle & Walking Infrastructure Plan

Tunbridge Wells have a Local Cycle and Walking Infrastructure Plan. Local Cycling and Walking Infrastructure Plans (LCWIPs), as set out in the Government's Cycling and Walking Investment Strategy (2017) are a new, strategic approach to identifying cycling and walking improvements required at the local level. LCWIPs provide a long-term approach to developing local cycling and walking networks, usually over a 10 year period.

The Tunbridge Wells LCWIP (Phase 1) will:

• Identify a network of priority cycle corridors focused on the town centre of Royal Tunbridge Wells and Southborough;

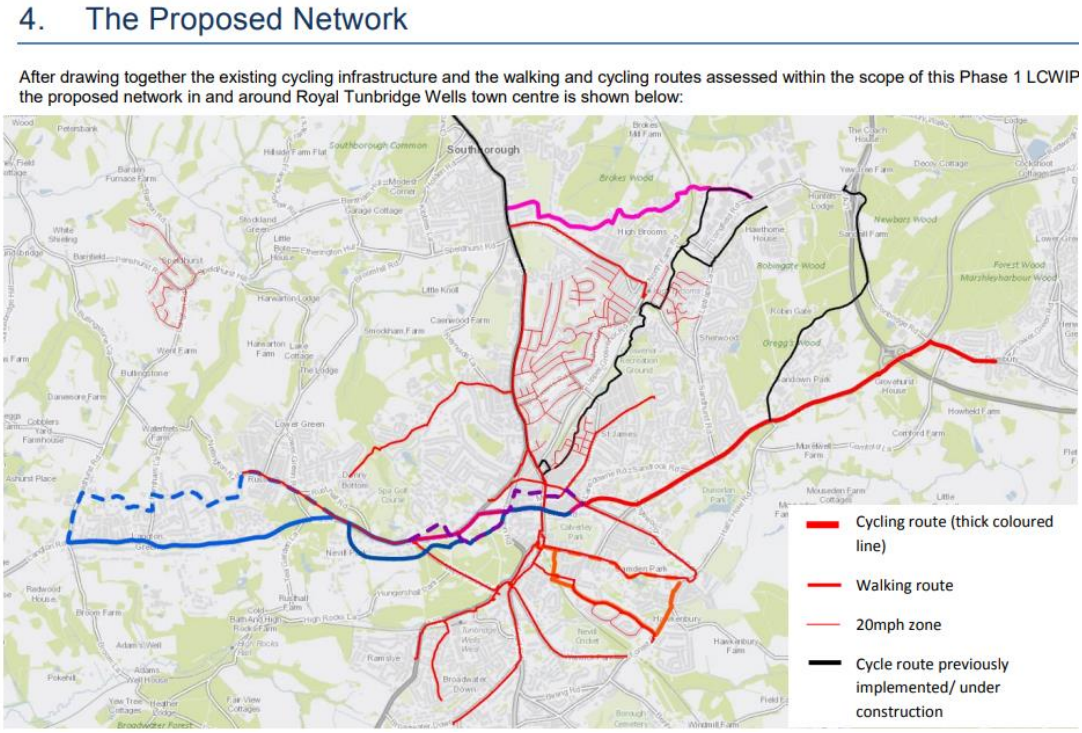
• Identify a network of walking routes focused on the core pedestrian zone of Royal Tunbridge Wells town centre and linking routes from areas around the town;

• Identify the measures needed to improve the infrastructure on the routes to make a real change;

• Prioritise the schemes in order to ensure an effective and timely approach to delivery and to achieve value for money; and

• Support the delivery of the sites allocations and development management policies in the Local Plan, prioritising active and sustainable transport.

This first phase of our LCWIP for Tunbridge Wells borough, was prepared in 2019 as part of a Department for Transport pilot programme to encourage local authorities to plan for active travel. A limited number of updates have been made to this document in 2021. Phase 1 focuses on key routes into Royal Tunbridge Wells town centre where there is a significant opportunity to convert many shorter journeys to more active and sustainable modes of travel. Since then, Phase 2 of the Borough's LCWIP has been commissioned covering the town of Paddock Wood, Low Traffic Neighbourhoods and inter-urban routes between Paddock Wood, Tonbridge and Royal Tunbridge Wells



3.9.5 Open spaces and recreation

Local plan, 2021:

Access to high quality open spaces, and opportunities for sport and recreation, can make an important contribution to the health and wellbeing of communities. Sports and recreation areas and facilities can contribute positively to the wellbeing and quality of communities, as well as having a positive impact upon the quality of the built environment, and can be of ecological value.

The overall study conclusions are that the existing open space, sport, and recreation provision within the borough should be retained (unless alternative suitable provision is re-provided), quality should be improved, and provision for new facilities should be sought and supported.

Additionally, appropriate allocations will be made for open space, sport, and recreation provision alongside built development to ensure adequate provision is made for existing and future populations, as identified within the Open Space, Sport and Recreation Study. The identified needs are set out within the Infrastructure Delivery Plan supporting the growth set out in the Local Plan and within the individual place shaping policies in Section 5.

Targets:

- Retention of Open Space: No net loss of identified open space areas or facilities and support of Policy OSSR 1 at appeal - 65% or more appeal decisions support TWBC conclusion on Policy OSSR 1 (if relevant to appeal)
- The Provision of Publicly Accessible Open Space and Recreation-Residential development to provide Open space in line with standards- Developments above open space threshold (20 dwellings) permitted with on-site open space provision

Key findings from the Open Space Strategy Report 2017:

- For all kinds of outdoor facilities/open spaces a majority of households suggested that in general they were of average or better quality (though the most common rating tended to be only "average").
- In contrast some kinds of facilities/open spaces were rated relatively highly in terms of quality. These include: parks and recreation grounds (62% rate quality in general as being good or very good); play areas (55% similarly); and woodlands, wildlife areas and nature reserves (53%).
- In contrast, for significant numbers of residents, facilities need to be much more locally accessible before they will be used (for example, play areas, parks and recreation grounds, and informal open space areas - for ball games, picnics, hobbies, dog walking etc).
- 76% of households confirmed that they would be prepared to walk/cycle further if the quality of the route was improved. 77% also said that if the quality of the route was improved they would make the journey more often
- Parks and recreation grounds – mainly highlighting a need for additional space for such provision in relation to population/housing growth.
- Footpaths, bridleways and cycle paths in relation to access to facilities and as leisure facilities (better network)
- The borough Council Parks and Sports Team Leader notes that the quality of open spaces is generally good in Royal Tunbridge Wells. As budgets have reduced over recent years maintenance of existing provision has been and continues to be a major challenge. This is a particular issue for smaller play areas in residential areas as they tend not to benefit from S106 legal obligations for funding.
- Some sectors of the community face particular barriers to access such as disabled people; children and young people; households in the more isolated rural areas and those in the more deprived areas of the borough.

Figure 9 Access to amenity green space (600 metres)

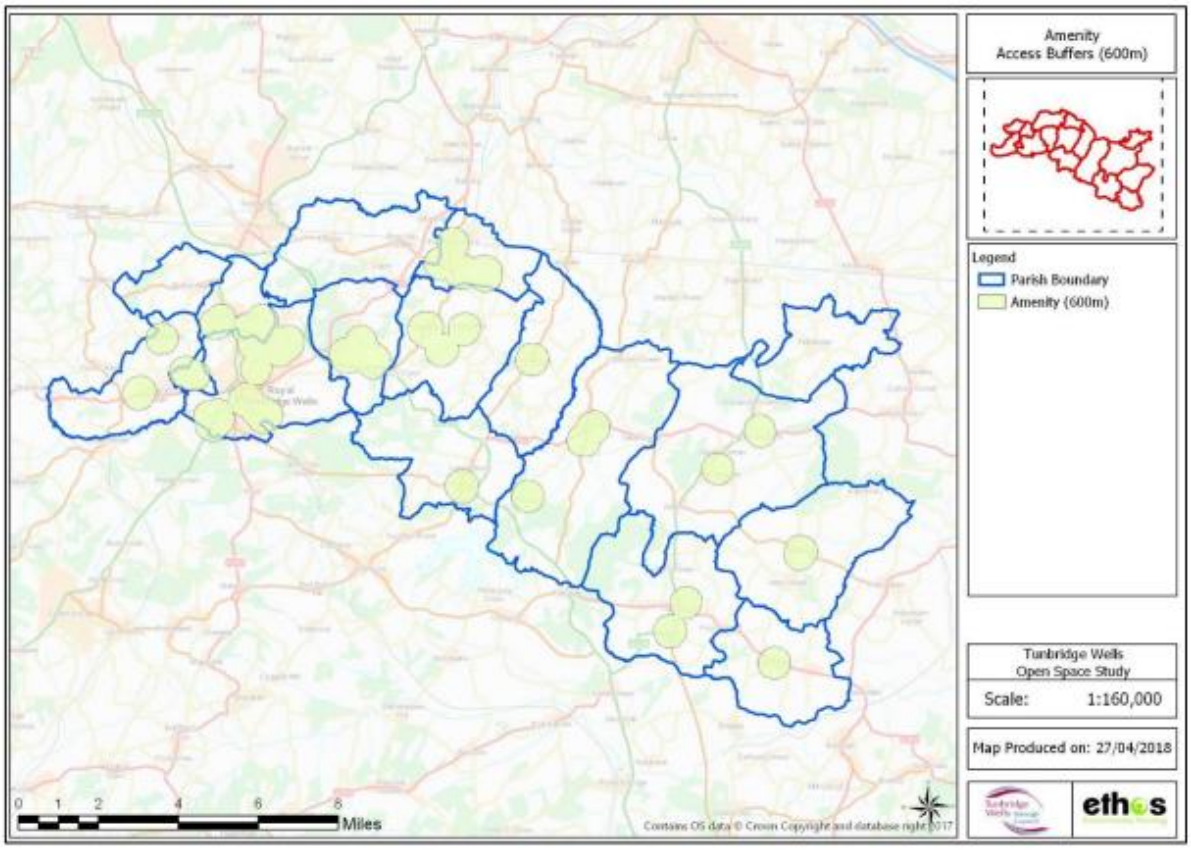


Figure 10 Access to parks and recreation grounds (600 metres)

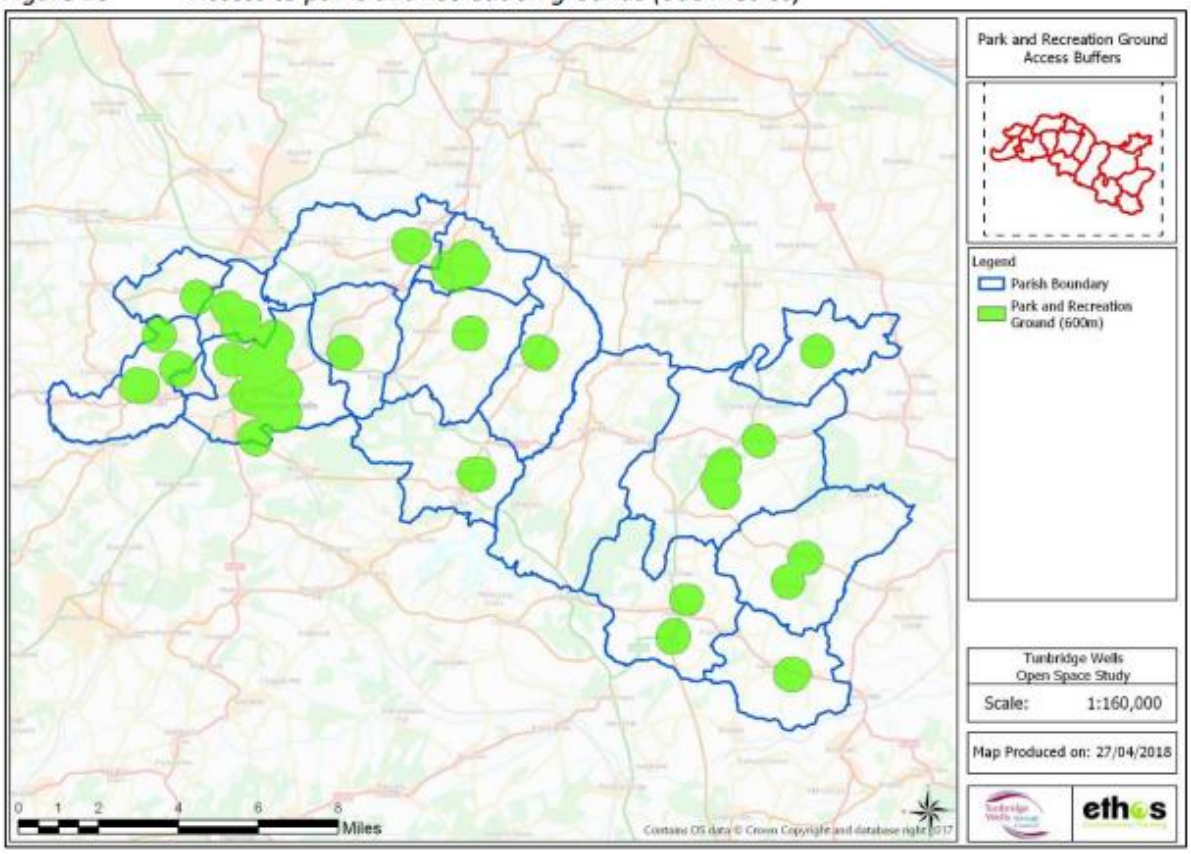
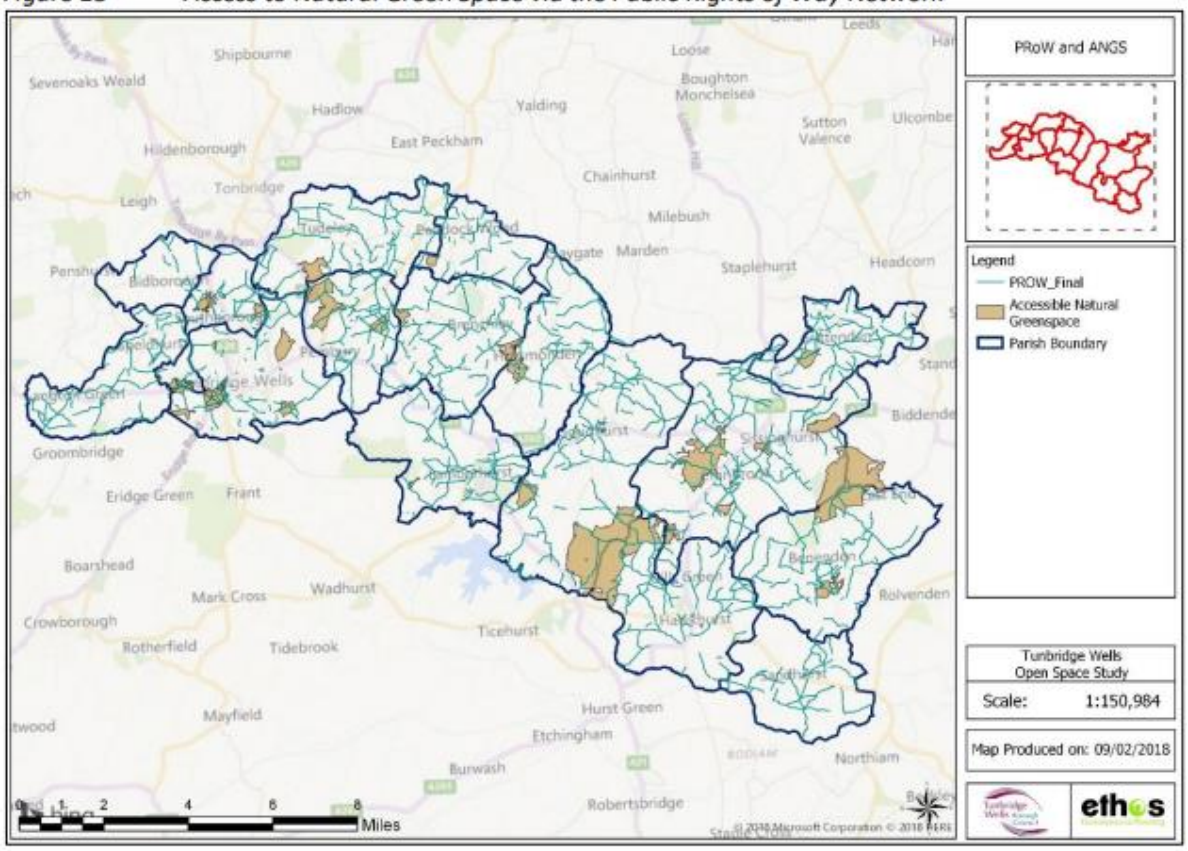


Figure 18 Access to Natural Green Space via the Public Rights of Way Network



Green Infrastructure Plan (2014):

The Kent Countryside Access Improvement Plan evaluates the extent to which local rights of way meet the present and likely future needs of the public. It acknowledges some opportunities within the Borough for enhancing commuter links; new access routes, and use of redundant sections of the A21 associated with future widening; and links from Royal Tunbridge Wells to tourist attractions

The proportion of public rights of way accessible to equestrians, whether riders or carriage drivers, is low when compared to the rest of Kent or the national picture and routes such as these are often disjointed. Improving the number of routes, their accessibility and connectivity for equestrians can support many GI objectives and will also increase accessibility for cyclists.

During the preparation of this Plan, additional analysis of access to open space and other accessible natural green space (based on the ANGSt standards) has been carried out.

The main points are:

•Access to open space is good across the Borough as a whole.

•The north and the north east parts of the Borough have particularly good coverage; however, there are a few pockets of the Borough with limited access to Areas of Important Open Space.

•Goudhurst has particularly poor access to these areas, as does Benenden parish and the north of Lamberhurst parish access to parks is particularly good in the north western and northern parts of the Borough.

•Access to parks in the northern part of Goudhurst parish and Benenden parish is more limited access to natural and semi-natural open space is good across the whole of the Borough access to allotments is good in the north west and the east of the Borough.

•The south west and the east of the Borough have poor access to allotments, particularly as there are none in Frittenden, Benenden or Sandhurst

Policy STR 5- infrastructure and connectivity (Local Plan, 2021)

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 Policies 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.

SECTION 4: DISTRICT PROJECTS TO NOTE

4.1 Buglife B-Lines (Green Infrastructure Strategy, 2021)

The Council supports this initiative and has made specific contributions to pollinator projects through work on the Commons and through Tunbridge Wells in Bloom and would like to see work on GI making a positive contribution to this strategy (see more in Section 2.2.1)

4.2 Interim Biodiversity Net Gain Project (Interim BNG Project)

- Management plans for local woodland to produce further BNG units 30-year time scale (to sell to developers as a revenue stream).
- Marshley Harbour Woods is the largest (33.1 ha) of the three project sites in Tunbridge Wells. The majority of this site consists of ancient semi-natural woodland, with mixed broadleaved species and a conifer high forest. Only a small area of deciduous woodland is in good condition, the rest of the site's habitats are currently in poor or moderate ecological condition, including the two small grassland habitats.
- Basset's and Snipe Wood 15 ha mix of species including oak, ash, sweet chestnut, cherry, birch regeneration, beech, western hemlock, larch and pine; arranged in three types of woodland. Selective thinning, felling and invasive species control are the primary management proposals to drive the ecological enhancements.
- High Woods Total Area: 10.22 ha This ancient semi-natural woodland is divided in a western area of modified grassland and a lowland mixed deciduous woodland. Chestnut, oak and hazel are the dominant species, with some invasive species throughout the woodland. majority of the woodland area is in good condition. No habitat transitions are necessary in High Woods, only enhancement of the grassland and those woodland areas in poor and moderate condition.

SECTION 5: SPECIFIC PRIORITIES WITHIN NEIGHBOURHOOD PLANS

5.1 Available Plans:

Benenden

Brenchley and Matfield

Capel

Cranbrook and Sissinghurst

Goudhurst

Hawkhurst

Horsmonden

Lamberhurst

Paddock Wood

Pembury

SECTION 6: DOCUMENTS REVIEWED AND REFERENCED

Document reference	Link
Local Plan, 2021	CD_3.128_Local-Plan_Submission-version-compressed.pdf
LCWIP, 2021	01_LCWIP-Phase-1-March-2021.pdf (tunbridgewells.gov.uk)
Open Space Strategy, 2017	c_Open_Space_Study.pdf (tunbridgewells.gov.uk)
Local Biodiversity Action Plan, 2008	LBAP-Part-1-Habitats.pdf (tunbridgewells.gov.uk) Brief for Local Biodiversity Action Plan (tunbridgewells.gov.uk)
Protecting Ashdown Forest	Protecting Ashdown Forest (tunbridgewells.gov.uk)
Green Infrastructure Plan, 2014	Green Infrastructure Plan Supplementary Planning Document (tunbridgewells.gov.uk)
Green Infrastructure Plan, 2021	Green Infrastructure Framework for Pre-Submission Local Plan (tunbridgewells.gov.uk)
Infrastructure Delivery Plan	Infrastructure-Delivery-Plan_2021.pdf
Interim BNG Project	Microsoft Word - Annual Report Pembury 2022-23.docx (tunbridgewells.gov.uk)