

Sevenoaks Regulation 19 Local Plan

Habitats Regulation Assessment

Sevenoaks District Council

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1. Background

Introduction

- 1.1 AECOM was appointed by Sevenoaks District Council (hereafter referred to as ‘Sevenoaks DC’) to assist the Council in undertaking a Habitats Regulations Assessment of its Regulation 19 Local Plan (hereafter referred to as the ‘Plan’). The objective of this assessment is to identify any aspects of the Plan that would cause an adverse effect on the integrity of the National Site Network, previously known as Habitats sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, since the adoption of the Planning and Infrastructure Act 2025, Ramsar sites, which are now given the same statutory protection as SAC and SPA.), either alone or in combination with other plans and projects, and to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified
- 1.2 The Local Plan seeks to meet identified housing and employment needs within the District whilst protecting and enhancing the built and natural environment. It sets out the spatial strategy for development and identifies the scale, type and location of growth over the plan period to 2042. The Plan provides for a minimum housing requirement of 1,164 dwellings per annum, alongside the delivery of employment floorspace and supporting infrastructure required to accommodate this growth.
- 1.3 An earlier HRA of the Sevenoaks District Local Plan was undertaken by Sevenoaks DC in June 2017 and a subsequent HRA was prepared in 2023 to support later iterations of the Plan. These assessments identified that the primary potential impact pathways to Habitats sites relate to recreational pressure and atmospheric pollution arising from traffic flows, particularly in relation to Ashdown Forest SAC/SPA. These pathways remain the focus of the current assessment. The current HRA builds on this earlier work, taking account of updated evidence, the Regulation 19 Plan structure and confirmed growth strategy.
- 1.4 The objective of this Report is to identify any aspects of the Plan that would be likely to lead to Likely Significant Effects or Adverse Effects on Integrity of any sites afforded protection under the Habitats Regulations. In the UK, this comprises Special Areas of Conservation (SACs), Special Protection Areas (SPAs), candidate Special Areas of Conservation (cSACs), potential Special Protection Areas (pSPAs) and sites designated under the Ramsar Convention on Wetlands of International Importance (Ramsar sites). These sites are referred to collectively in this Report as “Habitats Sites”.

Legislation

- 1.5 The need for HRA is set out within the Conservation of Habitats & Species Regulations 2017 as amended (**Box 1**). Habitats sites can be defined as actual or proposed/candidate Special Areas of Conservation (SAC) or Special Protection Areas (SPA). It is also Government policy (set out in the National Planning Policy Framework) for sites designated under the Convention on Wetlands of International Importance (Ramsar sites) to be treated as having equivalent status to Habitats sites.

Box 1: The legislative basis for Appropriate Assessment

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

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

- 1.6 The Habitats Regulations applies the precautionary principle to Habitats sites (SAC and SPA). For the purposes of this assessment candidate SACs (cSACs), proposed SPAs (pSPAs) and proposed Ramsar (pRamsar) sites are all treated as fully designated sites. In this report we use the term “Habitats sites” to refer collectively to the sites listed in this paragraph.

- 1.7 Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.
- 1.8 The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). However, the Withdrawal Act retains the body of existing EU-derived law within our domestic law. Habitats Regulations Assessment therefore continues as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, unless this requirement is changed by future legislation. Similarly, although EU case law is currently still considered of relevance in the UK courts that position may change during plan preparation and the Local Plan period. Therefore, all stages of the HRA will need to be mindful of changes in legislation and caselaw.
- 1.9 This HRA assumes that European Court of Justice (ECJ) rulings regarding HRA will continue to be considered useful jurisprudence by the UK courts. In 2018, the ‘People Over Wind’ ECJ ruling¹ determined that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce the harmful effects of a plan or project on Habitats sites) should not be taken into account when forming a view on likely significant effects. Mitigation should instead only be considered at the appropriate assessment stage. Appropriate assessment is not a technical term: it simply means ‘an assessment that is appropriate’ for the plan or project in question. As such, the law purposely does not prescribe what it should consist of or how it should be presented; these are decisions to be made on a case by case basis by the competent authority².
- 1.10 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

Scope of the Project

- 1.11 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways (called the source-pathway-receptor model) rather than by arbitrary ‘zones’. Current guidance suggests that the following Habitats sites be included in the scope of assessment:
- All sites within the Sevenoaks District boundary; and,
 - Other sites shown to be linked to development within the District boundary through a known ‘pathway’ (discussed below).
- 1.12 Briefly defined, pathways are routes by which a change in activity provided within a Local Plan document can lead to an effect upon a European designated site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could then affect Habitats sites by, for example, disturbance of wintering or breeding birds. Guidance from the former Department of Communities and Local Government (DCLG) states that the HRA should be ‘*proportionate to the geographical scope of the [plan policy]*’ and that ‘*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*’ (DCLG, 2006, p.6). More recently, the Court of Appeal³ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘*achieved in practice*’ to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy document)⁴. In this case the High Court ruled that for ‘*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a*

¹ Case C-323/17

² ‘*appropriate indicates no more than that the assessment should be appropriate to the task in hand, that task being to satisfy the responsible authority that the project will not adversely affect the integrity of the site concerned. It requires a high standard of investigation, but the issue ultimately rests on the judgment of the authority*’: R (Champion) v North Norfolk District Council [2015] 1 WLR 3710, para 41 per Lord Carnwath JSC.

³ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁴ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations'.

1.13 However, given the findings of previous Sevenoaks Local Plan HRAs, this report will focus entirely on the following Habitats sites:

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

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

In order to fully inform the screening process, a number of studies have been consulted to determine likely significant effects that could arise from the emerging Regulation 19 Local Plan. These include:

- Published local Plans and supporting evidence (including Habitats Regulations Assessments where available) for neighbouring authorities, including Lewes, Mid Sussex, Horsham, Wealden, Rother and Brighton & Hove, to identify potential in-combination effects,
- Ashdown Forest Air Quality Impact Assessment undertaken in support of previous iterations of the Local Plan HRA,
- Ashdown Forest Visitor Surveys 2016⁵ and 2021⁶;
- The UK Air Pollution Information System (www.apis.ac.uk); and
- Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk)

This evidence base, together with previous Habitats Regulations Assessments undertaken in 2017 and 2023, has informed the identification of relevant impact pathways and the assessment of likely significant effects.

Quality Assurance

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

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

2. Methodology

Introduction

2.1 The HRA has been carried out with reference to the general EC guidance on HRA⁷; the UK government has produced its own guidance⁸. These have been referred to in undertaking this HRA.

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

⁵ Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.

⁶ https://www.sevenoaks.gov.uk/downloads/file/3609/ashdown_forest_visitor_survey_report_march_2022

⁷ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>

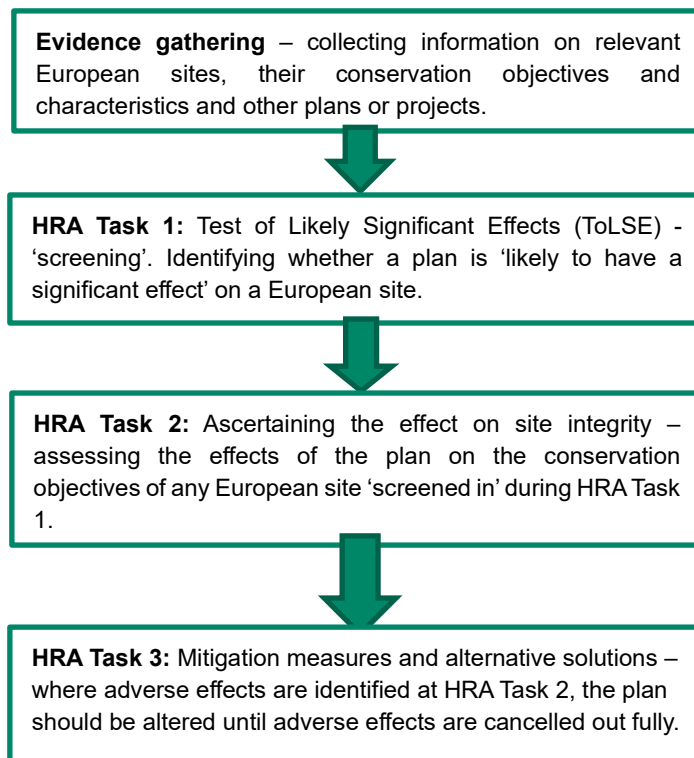


Plate 1. Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

Description of HRA Tasks

HRA Task 1 – Likely Significant Effects (LSE)

- 2.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- 2.4 "Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?"
- 2.5 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon Habitats sites, usually because there is no mechanism for an adverse interaction with Habitats sites. This stage is undertaken in Chapter 4 of this report and in Appendix A.

HRA Task 2 – Appropriate Assessment (AA)

- 2.6 The purpose of this report is HRA Task 1. However, where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'appropriate assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects.
- 2.7 By virtue of the fact that it follows Screening, there is a clear implication that the analysis will be more detailed than undertaken at the Screening stage and one of the key considerations during appropriate assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the appropriate assessment would take any policies or allocations that could not be dismissed following the high-level Screening analysis and analyse the potential for an effect in more detail, with a view to concluding whether there would actually be an adverse effect on integrity (in other words, disruption of the coherent structure and function of the Habitats site(s)).

- 2.8 There has been a very recent decision by the European Court of Justice⁹, which appears to conclude that measures intended to avoid or reduce the harmful effects of a proposed project on a Habitats site, but which are not an integral part of the project or plan, may no longer be taken into account by competent authorities at the Likely Significant Effects or 'screening' stage of HRA. This contradicts many years of UK court rulings that concluded mitigation *could* be taken into account at 'screening'. The implications of the ECJ ruling are structural and semantic rather than substantive, essentially meaning that the role of avoidance and measures should be discussed in the subsequent 'appropriate assessment' stage instead.

HRA Task 3 – Avoidance and Mitigation

- 2.9 Where necessary, measures will be recommended for incorporation into the Plan in order to avoid or mitigate adverse effects on Habitats sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for recreational impacts on Habitats sites. The implication of this precedent is that it is not necessary for all measures that will be deployed to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.10 In evaluating significance, AECOM has relied on professional judgement as well as the results of previous stakeholder consultation regarding development impacts on the Habitats sites considered within this assessment.
- 2.11 When discussing 'mitigation' for a Local Plan document, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since the Local Plan document is a high-level policy document.

3. Habitats Designated Sites

Ashdown Forest Special Area of Conservation

Introduction

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

Features of European interest¹⁰

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

- Wet heathland
- European dry heathland
- Great crested newt (*Triturus cristatus*)

Conservation Objectives¹¹

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

⁹ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

¹⁰ Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

¹¹ Natural England (2014). European Site Conservation Objectives for Ashdown Forest SAC Site Code: UK0030080 <http://publications.naturalengland.org.uk/file/6746917321048064> [accessed 06/07/2018]

- 3.4 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of the qualifying natural habitats
 - The structure and function of the habitats of qualifying species
 - The supporting processes on which qualifying habitats and the habitats of the qualifying species rely
 - The population of each of the qualifying species, and,
 - The distribution of the qualifying species within the site.

Key Environmental Vulnerabilities¹²

- 3.5 The key environmental vulnerabilities for the site are:
- Change in land management
 - Air pollution: risk of atmospheric nitrogen deposition
 - Public Access/Disturbance
 - Hydrological changes

Ashdown Forest Special Protection Area

Introduction

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

Features of European interest¹³

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

Breeding;

- European nightjar (*Caprimulgus europaeus*)
- Dartford warbler (*Sylvia undata*)

Conservation Objectives¹⁴

- 3.8 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features'), and subject to natural change;
- 3.9 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

¹² Natural England (2014) Ashdown Forest Site Improvement Plan <http://publications.naturalengland.org.uk/file/5534055007256576>
<http://publications.naturalengland.org.uk/file/6679502935556096> [accessed 01/05/2018]

¹³ Features of European Interest are the features for which a European site is selected. They include habitats listed on Annex 1 of the Habitats Directive, species listed on Annex II of the EC Habitats Directive and populations of bird species for which a site is designated under the EC Birds Directive.

¹⁴ Natural England (2014) European Site Conservation Objectives for Ashdown Forest SPA Site Code: UK9012181 <http://publications.naturalengland.org.uk/publication/6399918323269632> [accessed 01/05/2018]

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

Key Environmental Vulnerabilities¹⁵

3.10 The key environmental vulnerabilities for the site are:

- Change in land management;
- Air pollution: risk of atmospheric nitrogen deposition;
- Public Access/Disturbance; and,
- Hydrological changes.

4. Test of Likely Significant Effects

Introduction

- 4.1 The full Likely Significant Effects assessment of Policies identified within the Sevenoaks District Council Local Plan can be found in Appendix A.
- 4.2 The following paragraphs summarise the outcome of the Likely Significant Effects assessment and identify policies and site allocations that (prior to considering the role of mitigation) have potential to result in likely significant effects upon the Ashdown Forest SAC & SPA.

Impact Pathways Considered

- 4.3 The following impact pathways are considered further within this HRA:
- Increase in atmospheric pollution from an increase in traffic flow; and,
 - Increased recreational pressure.

Impact Pathways Scoped Out for Appropriate Assessment

- 4.4 The following impact pathways have been scoped out for Appropriate Assessment.
- Loss of Functionally Linked Habitat,
 - Hydrological Impacts (water quantity and water quality)

¹⁵ Natural England (2014) Ashdown Forest Site Improvement Plan <http://publications.naturalengland.org.uk/file/5534055007256576>
<http://publications.naturalengland.org.uk/file/6679502935556096> [accessed 01/05/2018]

Atmospheric Pollution

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

Pollutant	Source	Effects on habitats and species
Acid deposition	SO ₂ , NO _x and ammonia all contribute to acid deposition. Although future trends in S emissions and subsequent deposition to terrestrial and aquatic ecosystems will continue to decline, it is likely that increased N emissions may cancel out any gains produced by reduced S levels.	Can affect habitats and species through both wet (acid rain) and dry deposition. Some sites will be more at risk than others depending on soil type, bed rock geology, weathering rate and buffering capacity.
Ammonia (NH ₃)	Ammonia is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but levels have increased considerably with expansion in numbers of agricultural livestock. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ ⁺) - containing aerosol which may be transferred much longer distances (can therefore be a significant trans-boundary issue.)	Adverse effects are as a result of nitrogen deposition leading to eutrophication. As emissions mostly occur at ground level in the rural environment and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides NO _x	Nitrogen oxides are mostly produced in combustion processes. About one quarter of the UK's emissions are from power stations, one-half from motor vehicles, and the rest from other industrial and domestic combustion processes.	Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) can lead to both soil and freshwater acidification. In addition, NO _x can cause eutrophication of soils and water. This alters the species composition of plant communities and can eliminate sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to nitrogen deposition derive mainly from NO _x and NH ₃ emissions. These pollutants cause acidification (see also acid deposition) as well as eutrophication.	Species-rich plant communities with relatively high proportions of slow-growing perennial species and bryophytes are most at risk from N eutrophication, due to its promotion of competitive and invasive species which can respond readily to elevated levels of N. N deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions from NO _x and volatile organic compounds (VOCs). These are mainly released by the combustion of fossil fuels. The increase in combustion of fossil fuels in the UK has led to a large increase in background ozone concentration, leading to an increased number of days when levels across the region are above 40ppb. Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.	Concentrations of O ₃ above 40 ppb can be toxic to humans and wildlife, and can affect buildings. Increased ozone concentrations may lead to a reduction in growth of agricultural crops, decreased forest production and altered species composition in semi-natural plant communities.
Sulphur Dioxide SO ₂	Main sources of SO ₂ emissions are electricity generation, industry and domestic fuel combustion. May also arise from shipping and increased atmospheric concentrations in busy ports. Total SO ₂ emissions have decreased substantially in the UK since the 1980s.	Wet and dry deposition of SO ₂ acidifies soils and freshwater, and alters the species composition of plant and associated animal communities. The significance of impacts depends on levels of deposition and the buffering capacity of soils.

- 4.5 The main pollutants of concern for Habitats sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.
- 4.6 Sulphur dioxide emissions are overwhelmingly influenced by the output of power stations and industrial processes that require the combustion of coal and oil as well (particularly on a local scale) shipping. Ammonia emissions are dominated by agriculture, with some chemical processes also making notable contributions. As such, it is unlikely that material increases in SO₂ or NH₃ emissions will be associated with the Regulation 19 Local Plan. NO_x emissions, however, are dominated by the output of vehicle exhausts (more than half of all emissions). Within a 'typical' housing development, by far the largest contribution to NO_x (92%) will be made by the associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison¹⁶. Emissions of NO_x could therefore be reasonably expected to increase as a result of greater vehicle use as an indirect effect of the Regulation 19 Local Plan.
- 4.7 According to the World Health Organisation, the critical NO_x concentration (critical threshold) for the protection of vegetation is 30 µg m⁻³; the threshold for sulphur dioxide is 20 µg m⁻³. In addition, ecological studies have determined 'critical loads'¹⁷ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).
- 4.8 According to the guidance¹⁸, beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant. This is therefore the distance that has been used throughout this HRA in order to determine whether Habitats sites are likely to be significantly affected by development under the Local Plan.

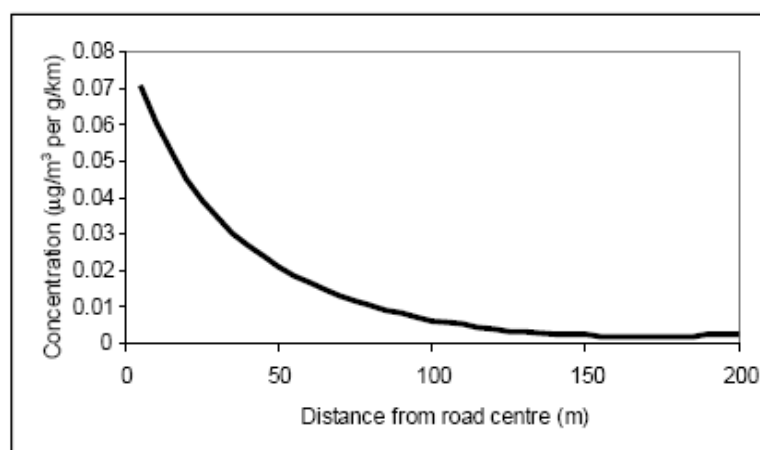


Figure 1 Traffic contribution to concentrations of pollutants at different distances from a road

- 4.9 Exhaust emissions from vehicles are capable of adversely affecting heathland habitats. Considering this, an increase in net population and employment growth within the Sevenoaks District could result in increased traffic through Ashdown Forest SAC which is designated for its wet and dry heathland habitats.

Recreational Pressure

- 4.10 Concern regarding the effects of disturbance on birds in particular, stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹⁹. Disturbance therefore risks increasing energetic output while reducing energetic input, which can

¹⁶ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php>

¹⁷ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur

¹⁸ <http://iaqm.co.uk/text/guidance/air-quality-impacts-on-nature-sites-2019.pdf> and <https://publications.naturalengland.org.uk/publication/4720542048845824>

¹⁹ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds.²⁰ Winter activity can cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages.

- 4.11 Ashdown Forest SPA is vulnerable to recreational pressure because of the risk of reducing the breeding success of nightjar and Dartford warbler, which are ground nesting birds and qualifying features of the SPA. However, at its closest point, Ashdown Forest is 5.6 km from the boundary of Sevenoaks District and is over 10.5 km away from the nearest large settlement of Edenbridge. The nearest allocated site within the Local Plan is located approximately 10.94 km from Ashdown Forest, and is therefore well beyond the established zone of influence for recreational effects. While this indicates that individual site allocations will not give rise to increased recreational pressure, the overall scale of growth provided for by the Local Plan, including windfall development which may occur closer to the SAC/SPA, means that a potential pathway for recreational effects cannot be excluded at the plan level. An increase in recreational pressure as a result of growth in Sevenoaks District is therefore a potential concern for the population of bird species for which the SPA is designated.

Policies

- 4.12 The following Policies have been screened in for appropriate assessment. These policies present potential impact pathways by which a likely significant effect on Ashdown Forest SAC and SPA site could result prior to consideration of the role of mitigation:

- Policy ST1 A Balanced Strategy for Growth;
- Policy ST2 Housing and Mixed Use Site Allocations;
- Policy ST3 Previously Developed Land Site Allocations;
- Policy ST4 Greenfield / Grey Belt Site Allocations;
- Policy ST5 – Other Greenfield Major Site Allocations;
- Policy GT1 Provision for the Gypsy and Traveller Community;
- Policy EMP1 Delivering Economic Success; and
- Policy EMP2 Delivering New Employment Land.

- 4.13 This is because all of these policies promote housing or employment development in the district. The remaining policies have all been screened out (see Appendix A, for full details of Likely Significant Effects test).

Site Allocations

- 4.14 With regard to recreational pressure, all Site Allocations, or specific locations identified for development within policies, are located at least approximately 10.9 km from Ashdown Forest SAC and SPA, with the closest sites situated within the Edenbridge area. The majority of allocations lie at distances of between approximately 11 km and 22 km from the Habitats site. These distances substantially exceed the core catchment from which the majority of visitors to Ashdown Forest are derived.
- 4.15 Given this separation, there is no reasonable prospect that individual site allocations would result in discernible increases in recreational pressure on Ashdown Forest SAC and SPA. Accordingly, all Site Allocations identified within Policies ST2, ST3, ST4 and ST5 have been screened out for the purposes of Appropriate Assessment in relation to recreational effects.
- 4.16 While site allocations will contribute to an overall increase in population and associated movement across the District, including potential journey-to-work traffic passing through the Ashdown Forest SAC/SPA, this represents a district-wide effect associated with the overall scale of growth rather than any individual

²⁰ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

allocation. Whilst individual site allocations are located beyond the recreational zone of influence and therefore do not give rise to effects in isolation, they contribute to the overall quantum of development within the District. As such, their effects are appropriately assessed at the plan level through the screening of strategic policies, notably Policy ST1.

Impact Pathways Scoped Out for Appropriate Assessment

Loss of Functionally Linked Land

- 4.17 Loss of functionally linked land may occur where land outside a designated Habitats site provides supporting habitat for qualifying species, particularly mobile SPA bird species.
- 4.18 The qualifying species for Ashdown Forest SPA (nightjar and Dartford warbler) are strongly associated with heathland habitats and utilise relatively small home ranges centred on breeding territories. Nightjar establish breeding territories alongside wider home ranges used for foraging and daily activity, but these remain spatially limited and closely associated within continuous heathland and nightjar shows limited dispersal beyond suitable habitat. Dartford warbler are even more restricted in their movements, typically occupying small territories within continuous heathland and showing limited dispersal beyond suitable habitat.
- 4.19 All proposed development locations are situated at distances exceeding approximately 10km from Ashdown Forest SAC/SPA. This distance is substantially greater than the scale over which qualifying species would be expected to utilise land functionally associated with the SPA population.
- 4.20 Strategic approaches to comparable heathland SPAs identify zones of influence for disturbance (which operate over considerably larger distances than habitat use) at around 5 km from designated sites, further indicating that functional habitat use is spatially constrained to areas much closer to the SPA.²¹
- 4.21 On this basis, there is no credible pathway between the Local Plan and the loss of functionally linked land associated with Ashdown Forest SPA and this pathway is scoped out of Appropriate Assessment.

Hydrological Impacts (Water Quality and Water Quantity)

- 4.22 Hydrological impacts pathways may arise where development affects surface water or groundwater systems that are hydrologically connected to the Habitats site, resulting in changes to water levels, flow regimes, or water quality. Changes in hydrology are identified as a key environmental vulnerability for Ashdown Forest SAC/SPA, particularly in relation to the maintenance of heathland habitats.
- 4.23 Ashdown Forest SAC/SPA is located within the headwaters of local river systems, with streams draining outwards from the site into the wider catchments. As such, the site functions as an upstream source area rather than a downstream receptor.
- 4.24 Development within Sevenoaks District is not hydrologically connected in a manner that would allow effects (e.g. pollution or changes in water quantity) to propagate upstream to Ashdown Forest.
- 4.25 In the absence of a hydrological pathway linking development to the Habitats site, no credible impact pathway exists and as such this pathway is scoped out for Appropriate Assessment.

²¹ [Objections: RSPB | Liveforest](#)

5. Appropriate Assessment: Ashdown Forest SAC & SPA

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

- 5.1 The qualifying features of Ashdown Forest SAC comprise heathland habitat types, all of which are sensitive to air pollution. Moreover, the qualifying species of Ashdown Forest SPA, the nightjar and Dartford warbler, both somewhat rely on heathland habitat for foraging and breeding and are therefore indirectly impacted by increases in atmospheric pollution through changes to habitat.
- 5.2 Whilst the impact of atmospheric pollution was screened out from consideration in the Core Strategy HRA, in part due to the lower scale of growth and distances involved, it is being considered in this assessment. This reflects both changes in assessment practice following legal challenges in relation to Ashdown Forest SAC/SPA, and the substantially increased scale of development proposed in the Local Plan. The Regulation 19 Plan provides for a minimum of 1,164 dwellings per annum, representing a significant uplift compared to the Core Strategy requirement of 165 dwellings per annum. This increased level of growth has the potential to result in a corresponding increase in traffic generation across the District, and therefore a potential pathway for effects on the Habitats site via air quality cannot be excluded at the screening stage.
- 5.3 Policies identified to provide for new development within the District are:
- Policy ST1 A Balanced Strategy for Growth;
 - Policy ST2 Housing and Mixed Use Site Allocations;
 - Policy ST3 Previously Developed Land Site Allocations;
 - Policy ST4 Greenfield / Grey Belt Site Allocations;
 - Policy ST5 Other Greenfield Major Site Allocations;
 - Policy GT1 Provision for the Gypsy and Traveller Community;
 - Policy EMP1 Delivering Economic Success;
 - Policy EMP2 Delivering New Employment Land.
- 5.4 Although these policies do not directly affect the integrity of the Habitats site, collectively they provide for housing and employment growth within Sevenoaks District. This will result in an increase in resident population and associated economic activity, and is therefore likely to lead to increased traffic generation across the District. While any increase in traffic flows on routes passing in proximity to Ashdown Forest SAC/SPA is expected to be limited in scale, a potential pathway for effects via air quality cannot be excluded at this stage, and this is therefore considered further in the Appropriate Assessment.
- 5.5 Policies ST3, ST4 and ST5 include a range of smaller and/or dispersed site allocations and development opportunities which are not all individually listed, but which contribute to the overall quantum of development and are therefore assessed collectively at the plan level.
- 5.6 It is considered that only a limited proportion of journey-to-work traffic originating from Sevenoaks District is likely to utilise routes that pass in proximity to Ashdown Forest SAC and SPA. Review of the underlying transport model network indicates that the principal corridors within the District are oriented east–west and north–south, notably the M25 and M26 to the north, and the A21 linking the M25 with Royal Tunbridge Wells.
- 5.7 These routes are represented in the model as continuous link corridors and are unlikely to result in traffic flows that interact with the Habitats site.
- 5.8 A smaller number of routes extend from Sevenoaks District towards Ashdown Forest, including those corresponding to the B2026 corridor, which passes through settlements such as Edenbridge before entering the Forest, and the A26 corridor to the east via Tunbridge Wells and Crowborough. Edenbridge represents the closest main settlement within the District to Ashdown Forest SAC and SPA, located approximately 13.5

km from the Habitats European site when following the road network. Analysis of the transport model network identifies these routes as continuous sequences of connected links (based on FROMNODE–TONODE connectivity), forming coherent corridors through which traffic could travel towards the SAC. This is further supported by mapping of the model network, which demonstrates that only a small number of such corridors provide connectivity between Sevenoaks District and Ashdown Forest. Whilst these corridors provide a theoretical pathway for traffic associated with development within the District to pass within 200 m of the Habitats site, the scale of such movements is expected to be limited in the context of the wider transport network.

- 5.9 According to Journey to Work data from the 2021 census, six of the ten most common destinations for journeys to work arising from Sevenoaks District are London boroughs, while the others are Tunbridge Wells, Tonbridge & Malling, Tandridge and Dartford. These ten local authority areas account for almost 70% of journeys to work from Sevenoaks District into surrounding districts. In contrast, only 404 (just over 1%) of journeys to work from Sevenoaks District to other districts are to Wealden, Mid Sussex or Lewes (the three authorities most likely to involve a journey through Ashdown Forest, although all can be reached via alternative routes depending on destination). When considered alongside the transport model network structure, which confirms that only a limited number of southbound corridors connect Sevenoaks District to Ashdown Forest, the proportion of total journeys likely to traverse the SAC is very small. Moreover, this does not take into account journeys to work that start and end in Sevenoaks District, and approximately 40% of journeys to work are undertaken by modes other than private car, van or motorbike. Therefore, the actual proportion of total current journeys to work that might traverse Ashdown Forest is likely to be lower than indicated by commuting patterns alone. This is illustrated in Figure 2 below, which shows the transport model network and confirms that connectivity between Sevenoaks District and Ashdown Forest is limited to a small number of corridors.

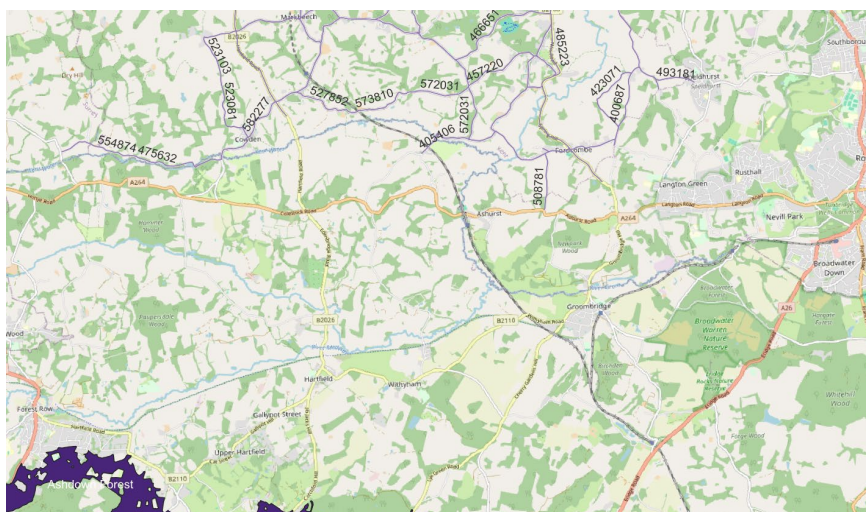


Figure 2: Transport Model Network and Key Road Corridors Connecting Sevenoaks District to Ashdown Forest SAC/SPA

- 5.10 Air quality modelling was undertaken for Ashdown Forest in March 2018 by AECOM on behalf of Lewes District Council and the South Downs National Park Authority, covering the period 2017–2033. The findings of this modelling provided an evidence base for understanding the relationship between traffic flows and air quality effects on the Habitats site.
- 5.11 Previous analysis drawing on this modelling considered the potential contribution of traffic associated with development in Sevenoaks District, both alone and in combination with growth in surrounding authorities including Tunbridge Wells, Lewes, and the South Downs National Park. This analysis identified that only

- those routes passing within 200m of Ashdown Forest SAC/SPA are relevant to potential air quality effects, and that the scale of traffic change on these routes would determine whether any effects are likely to arise.
- 5.12 Whilst this earlier modelling provides useful context, the current assessment adopts a proportionate approach based on the scale and distribution of growth proposed in the Regulation 19 Local Plan, together with the anticipated magnitude of change in traffic flows on relevant routes.
- 5.13 Available traffic data and the spatial distribution of development, together with review of the transport model link structure, indicate that increases in flows on routes passing within 200 metres of Ashdown Forest SAC/SPA (notably the corridors corresponding to the A26 south of Crowborough and the B2026 south of Hartfield) are expected to be extremely small, likely to comprise only a very small number of additional vehicle movements per day. These routes are represented within the model as continuous link chains forming the principal pathways to the SAC, and the predicted changes along these corridors are minimal.
- 5.14 Comparison of the Future Baseline (2042) and Local Plan (2042) scenarios indicates that increases in traffic flows on relevant links are small. For example, on a representative link within the B2026 corridor between Cowden and Hartfield, the Local Plan will contribute approximately 48 AADT, and the road then splits between Hartfield and Ashdown Forest such that by the time the road is adjacent to the SAC 3km further south the contribution of Sevenoaks Local Plan will have reduced to low double figures or single figures. A similar pattern of limited change is observed on higher-order routes such as the A26 corridor, where traffic flows due to Sevenoaks Local Plan are also 48 AADT at 5km north of the SAC and will therefore have fallen to low double figures by the time the SAC is reached.
- 5.15 Very small changes in 24-hour Annual Average Daily Traffic (AADT) flows of this magnitude will not materially alter air quality outcomes, for two principal reasons:
- Firstly, daily traffic flows are not fixed values but fluctuate from day to day. AADT represents an annual average (i.e. total annual traffic divided by 365 days), and actual daily flows vary around this mean. Changes of only a few vehicle movements per day lie well within normal daily variation and would not represent a statistically significant change in traffic flows.
 - Secondly, when translated into nitrogen oxides (NO_x) concentrations or nitrogen deposition rates, changes of this scale would only influence values at a level beyond that which can be meaningfully or reliably modelled. In practice, such changes would be indistinguishable from zero and would not result in a measurable change in roadside pollutant concentrations or nitrogen deposition at sensitive habitats.
- 5.16 Notwithstanding that background nitrogen deposition at Ashdown Forest SAC currently exceeds critical loads for heathland habitats, the scale of change predicted in traffic flows is so small that any associated increase in nitrogen deposition would represent an imperceptible fraction of existing exceedance and would not affect the structure or function of qualifying habitats.
- 5.17 Given the extremely small scale of change in traffic flows attributable to the Local Plan, the resulting contribution to nitrogen deposition is considered to be effectively negligible and not environmentally meaningful.
- 5.18 When translated into ecological effects, such minimal changes in traffic flows would result in a negligible change in nitrogen deposition, affecting only an extremely small fraction of a kilogram of nitrogen per hectare per year. This level of change is not environmentally meaningful in the context of the established critical loads for heathland habitats and would not affect the structure or function of qualifying habitats.
- 5.19 In addition, the Local Plan includes a specific safeguard (Policy AF1) requiring that any development likely to result in measurable increases in traffic through Ashdown Forest SAC is subject to project-level Habitats Regulations Assessment, ensuring that any potential air quality effects are identified and mitigated where necessary. This provides an additional safeguard in relation to potential air quality effects, although the above conclusion of no adverse effect on site integrity is not dependent on this measure.
- 5.20 On this basis, the contribution of the Sevenoaks District Local Plan to changes in air quality at Ashdown Forest SAC/SPA is considered to be negligible. This conclusion is supported by analysis of the transport model network, which confirms that the relevant traffic flows are confined to a small number of established corridors corresponding to the A26 and B2026, and that changes in flows along these routes would be

extremely limited. This conclusion applies both alone and in combination with other plans and projects, and it can therefore be concluded that no adverse effect on the integrity of the Habitats site will arise.

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

- 5.21 In 2010 a visitor survey of Ashdown Forest SAC and SPA was undertaken²². 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 and SPA was agreed with Natural England²³. 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.
- 5.22 In 2016 Footprint Ecology updated the visitor survey²⁴ 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.
- 5.23 In summary, the 2016 survey identified that 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 survey identified that c. 81% of survey respondents whose postcodes could be mapped lived within 7km of the SAC/SPA boundary²⁵. It also identified that 84% of all interviewees²⁶ whose postcodes were mapped were from Wealden District or Mid-Sussex District.
- 5.24 The 2016 visitor survey identified that, of 452 visitors surveyed, a total of five had travelled from Sevenoaks District, which accounts for barely 1% of visitors irrespective of frequency or purpose of visit. Further examining the 2016 visitor survey data with specific regard to its relevance to Sevenoaks District identifies that:
- When focussing on *regular* visitor use (which could be defined most broadly as 'at least once a month'), or dog walkers, the percentage that come from Sevenoaks District remains constant at 1%²⁷. In contrast, 88% of frequent visitors and over 80% of dog walkers come from Wealden or Mid-Sussex;
 - Focussing further on '*frequent*' users (visiting at least once a week), only one of the respondents from Sevenoaks District (0.4%²⁸) was a frequent user. In contrast, 94% of frequent visitors came from Wealden or Mid-Sussex.
 - The closest settlement to the forest from which Sevenoaks resident visitors derived was Edenbridge, located 10.5 km from the SAC and SPA at its closest;

²² 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

²³ UE Associates. October 2011. Habitat Regulations Assessment for the Mid-Sussex District Plan

²⁴ Liley, D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.

²⁵ A total of 353 respondents out of a total of 434 responses. This is a relevant statistic because the third quartile (75%) is the most widely used basis across the UK to define the primary recreational zone around European sites for which mitigation for additional residents should automatically be provided.

²⁶ Excluding those who were on holiday or staying with friends or family

²⁷ 4 survey respondents out of 377 survey respondents who visited once a month or more frequently according to Tables 18 and 6 of the visitor survey report

²⁸ 1 out of 285 respondents who visited at least once a week according to Tables 18 and 6 of the visitor survey report

- 5.25 In 2021, the survey was updated once more. This survey identified that of 559 visitors surveyed, nine (1.6%) came from Sevenoaks district. All but one of these respondents visited the site infrequently (once a month or less). Therefore patterns of activity from Sevenoaks residents in 2021 were similar to those in earlier surveys, with residents of Sevenoaks making up a small proportion of visitors, which are dominated by residents of Wealden and Mid-Sussex Districts.
- 5.26 Given the very small proportion of visitors to Ashdown Forest from Sevenoaks and the infrequency of visits made by even these visitors, it is evident that Ashdown Forest is used only to a very limited extent for recreational activity by residents from the District. Even if all visitors from the district were mitigated it would have a negligible effect on the SAC/SPA.
- 5.27 Policies identified to provide for new development within the District are:
- Policy ST1 A Balanced Strategy for Growth;
 - Policy ST2 Housing and Mixed Use Site Allocations;
 - Policy ST3 Previously Developed Land Site Allocations;
 - Policy ST4 Greenfield / Grey Belt Site Allocations;
 - Policy ST5 Other Greenfield Major Site Allocations;
 - Policy GT1 Provision for the Gypsy and Traveller Community;
 - Policy EMP1 Delivering Economic Success;
 - Policy EMP2 Delivering New Employment Land.
- 5.28 The site allocations identified within Policies ST2, ST3, ST4 and ST5 are all located at a substantial distance from Ashdown Forest SAC and SPA, with the closest sites situated at approximately 10.9 km from the Habitats site. These distances lie well beyond the core zone from which the majority of visitors to Ashdown Forest are derived.
- 5.29 However, it is recognised that a proportion of the housing requirement will be delivered through windfall development, some of which could occur within 7 km of Ashdown Forest SAC/SPA, which represents the principal zone of influence for recreational pressure. Within Sevenoaks District, only a very limited area falls within this zone, with Cowden being the sole settlement located within 7 km of the Habitats site.
- 5.30 No site allocations are proposed within Cowden, and given its small size and limited development capacity, any windfall development within the 7km zone is expected to be minor in scale. Whilst such development could theoretically contribute to recreational pressure, including in combination with growth in neighbouring authorities such as Wealden and Mid Sussex, the scale of this contribution from Sevenoaks District is likely to be very limited.
- 5.31 Notwithstanding the limited scale of potential windfall development within the 7 km zone, Policy AF1 (Ashdown Forest) provides a clear and consistent mitigation framework to address recreational impacts on the SPA and SAC. The policy requires all residential development resulting in a net increase in dwellings within 7 km of Ashdown Forest to contribute to the Strategic Access Management and Monitoring (SAMM) strategy and to provide or contribute towards Suitable Alternative Natural Greenspace (SANG).
- 5.32 These measures are designed to avoid and mitigate recreational pressure on Ashdown Forest SAC/SPA and are consistent with the established strategic approach adopted by surrounding authorities. The policy also ensures that any development likely to give rise to a significant effect is subject to project-level Habitats Regulations Assessment, with appropriate mitigation secured where necessary.
- 5.33 This reflects both the very limited scale of potential development within the zone of influence and the very small proportion of recreational visits arising from Sevenoaks District.
- 5.34 In this context, and given the limited contribution of development within Sevenoaks District to recreational visits to Ashdown Forest, it can be concluded that the Local Plan will not result in an adverse effect on the integrity of Ashdown Forest SAC/SPA as a result of recreational pressure, either alone or in combination with other plans and projects.

6. Summary of Conclusions

Ashdown Forest SAC

Atmospheric pollution

- 6.1 The qualifying features of Ashdown Forest SAC comprise heathland habitat types which are sensitive to atmospheric pollution, particularly nitrogen deposition. The qualifying bird species of the Ashdown Forest SPA, including nightjar and Dartford warbler, are functionally dependent on these heathland habitats and may therefore be indirectly affected by changes in air quality.
- 6.2 The assessment has identified that the Local Plan will result in an increase in traffic generation associated with planned housing and employment growth. However, having regard to the spatial distribution of development, the structure of the local and strategic road network, the underlying transport model network (including the identification of continuous link corridors), and established journey-to-work patterns, only a very small proportion of traffic associated with the Plan would be expected to travel along routes passing within 200 metres of Ashdown Forest SAC/SPA.
- 6.3 Traffic data derived from the transport model indicates that increases in flows on the relevant routes (notably those corresponding to the A26 south of Crowborough and the B2026 south of Hartfield) are expected to be extremely limited in scale, likely to comprise only a very small number of additional vehicle movements per day. These routes are represented within the model as continuous link corridors forming the principal pathways to Ashdown Forest. Changes of this magnitude lie well within normal daily variation in traffic flows and are not of a scale that would materially influence air quality outcomes.
- 6.4
- 6.5 Changes of this magnitude would be indistinguishable from normal daily variation in traffic flows and would not result in a measurable increase in roadside concentrations of nitrogen oxides (NOx) or in rates of nitrogen deposition at sensitive habitats within the SAC. Notwithstanding existing exceedance of critical loads at Ashdown Forest, any change in nitrogen deposition would be negligible and would not materially affect the ecological integrity of qualifying habitats.
- 6.6 The assessment has also taken into account the findings of previous air quality modelling undertaken for Ashdown Forest, which demonstrated that only materially larger increases in traffic flows would result in measurable ecological effects. In this context, the contribution of the Sevenoaks District Local Plan to changes in air quality is considered to be negligible.
- 6.7 The assessment has also considered the potential for in-combination effects with other plans and projects. Given that the Local Plan contribution represents only a very small increase in traffic flows on affected routes, amounting to a negligible proportion of total traffic, it would not materially alter cumulative traffic flows or associated pollutant concentrations. Its contribution to any in-combination air quality effect is therefore also negligible.
- 6.8 The inclusion of Policy AF1 provides an additional safeguard by ensuring that any development with the potential to affect Ashdown Forest SAC via air quality will be subject to project-level Habitats Regulations Assessment. This reinforces the precautionary approach, although the conclusion of no adverse effect on site integrity is not dependent on this measure.
- 6.9 On this basis, it is concluded that the Sevenoaks District Local Plan will not result in an adverse effect on the integrity of Ashdown Forest SAC or SPA, either alone or in combination with other plans and projects, as a result of atmospheric pollution. This conclusion is supported by analysis of the transport model network, which confirms that traffic flows towards the SAC are confined to a small number of established corridors corresponding to the A26 and B2026, and that changes in flows along these routes are negligible.

Ashdown Forest SPA

Recreational pressure

- 6.10 Ashdown Forest SPA is vulnerable to recreational pressure due to the potential for disturbance to ground-nesting birds, particularly nightjar and Dartford warbler, which are qualifying features of the site. However, the nearest main settlement within Sevenoaks District (Edenbridge) is located over 10.5 km from the Habitats site, and the majority of allocations within the Local Plan are located at distances exceeding 10.9 km.
- 6.11 Evidence from visitor surveys undertaken in 2016 and 2021 indicates that residents of Sevenoaks District account for only a very small proportion of visitors to Ashdown Forest, typically in the order of 1–1.6% of all visits, with an even smaller proportion of frequent users. The surveys also demonstrate that recreational use is dominated by residents of Wealden and Mid Sussex Districts.
- 6.12 Whilst a limited amount of windfall development may occur within the 7 km zone of influence, this is expected to be minor in scale and represents the only plausible pathway for effects. Policy AF1 (Ashdown Forest) establishes a clear mitigation framework, requiring all residential development within 7 km resulting in a net increase in dwellings to contribute to Strategic Access Management and Monitoring (SAMM) and to provide or contribute towards Suitable Alternative Natural Greenspace (SANG). The policy also ensures that development likely to give rise to significant effects is subject to project-level Habitats Regulations Assessment
- 6.13 In light of the very limited contribution of development within Sevenoaks District to recreational visits to Ashdown Forest, and the safeguards secured through Policy AF1, it can be concluded that the Sevenoaks District Local Plan will not result in an adverse effect on the integrity of Ashdown Forest SAC or SPA as a result of recreational pressure, either alone or in combination with other plans and projects.

Appendix A Initial Screening of Policies and Site Allocations

A.1 Screening of Plan Policies

6.14 Table 2 presents an HRA screening assessment of all the policies within the Local Plan. Where policies have been coloured green in the 'HRA implications' column, this indicates that the policy does not contain potential impact pathways linking to European designated sites and has been screened out from further consideration. Where policies have been coloured orange in the 'HRA implications' column, this indicates that the policy provides for potential impact pathways linking to European designated sites and has been screened in for further consideration in this report.

Table 2 Screening Assessment of Local Plan Development Management Policies

Policy number/ name	Policy detail	HRA implications
Policy ST1 – A Balanced Strategy for Growth	<p>The policy sets out the overarching spatial strategy for growth within Sevenoaks District over the plan period to 2042. It provides for a minimum of 1,164 dwellings per annum alongside employment development and supporting infrastructure. Development is directed primarily to existing settlements, with the main towns forming the focus for growth. The policy also establishes principles relating to sustainable development, land efficiency, and protection of the Green Belt and National Landscapes.</p> <p>This policy establishes the overall scale, quantum and spatial distribution of development across the District, including provision for a minimum of 1,164 dwellings per annum and associated employment growth. As such, it represents the principal driver of population increase and traffic generation over the plan period.</p>	<p>Possible HRA implications.</p> <p>This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.</p>
Policy ST2 – Housing and Mixed Use Site Allocations	<p>The policy allocates a series of housing and mixed-use development sites within existing urban areas. These allocations provide for a range of housing types, densities, tenures and supporting uses. The policy also incorporates carried-forward allocations from the previous Local Plan, with updated capacities where appropriate, and is supported by site-specific development guidance.</p>	<p>Possible HRA implications.</p> <p>This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential</p>

Policy number/ name	Policy detail	HRA implications
		to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.
Policy ST3 – Previously Developed Land Site Allocations – Housing and Mixed-use	The policy allocates sites on previously developed land, including within the Green Belt where appropriate, for residential and mixed-use development. These allocations contribute to meeting the District’s housing requirement while prioritising the efficient reuse of land.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.
Policy ST4 – Greenfield Grey Belt Site Allocations – Housing and Mixed-use	The policy allocates a number of greenfield “Grey Belt” sites for residential and mixed-use development. These sites are primarily located on the edges of higher-tier settlements or close to public transport infrastructure and contribute significantly to meeting the District’s housing requirement.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for

Policy number/ name	Policy detail	HRA implications
		likely significant effects cannot be excluded.
Policy ST5 – Other Greenfield Major Site Allocations – Housing and Mixed-use	The policy allocates large-scale strategic sites for residential and mixed-use development, including new or expanded settlement locations. These allocations typically include significant housing provision, infrastructure and supporting uses, and make a substantial contribution to meeting the overall housing requirement of the Local Plan.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.
Policy GT1 – Provision for the Gypsy and Traveller Community	The policy allocates sites for Gypsy and Traveller and Travelling Showperson accommodation across the District to meet identified needs over the plan period to 2042. The allocated sites provide residential pitches and associated facilities and contribute to the overall provision of housing within the District.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.
Policy GT2 – Gypsy and	The policy sets out criteria to guide the assessment of proposals for Gypsy and Traveller and Travelling Showperson accommodation. It establishes requirements relating to location, design, access, impact on surroundings and infrastructure	No HRA implications.

Policy number/ name	Policy detail	HRA implications
Travelling Showperson Accomodation	provision.	The policy provides criteria for assessing future development proposals but does not itself allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy.
Policy EMP1 – Delivering Economic Success	The policy sets out the strategy for delivering economic growth within the District, including support for employment-generating development, business growth, and provision of employment land and floorspace. It seeks to ensure that sufficient land and infrastructure are available to support economic activity over the plan period.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for likely significant effects cannot be excluded.
Policy EMP2 – New Employment Land	The policy supports the provision and delivery of employment land and floorspace across the District, including the development, intensification and appropriate expansion of employment sites. It contributes to meeting the Plan’s overall employment requirement and supports economic growth over the plan period.	Possible HRA implications. This policy contributes to the overall quantum and/or spatial distribution of development within the District. As such, it has potential to increase population and associated activity, including traffic generation, which may give rise to impact pathways affecting Habitats sites. Therefore, a pathway for

Policy number/ name	Policy detail	HRA implications
		likely significant effects cannot be excluded.
Policy EMP3 – Retaining and Optimising Existing Employment Land	The policy seeks to protect existing employment land and sets criteria for its redevelopment, intensification, expansion and change of use. It aims to safeguard the District’s employment land supply while allowing appropriate changes where justified.	No HRA implications. While the policy allows for redevelopment, intensification and expansion of existing employment sites, this occurs within the established land supply and does not introduce additional growth beyond that already identified in the Local Plan strategy. As such, it does not materially alter traffic patterns or activity levels in a way that would give rise to effects on Habitats sites.
Policy EMP4 – The Rural Economy	The policy supports the sustainable growth, diversification and adaptation of the rural economy, including agricultural diversification, rural enterprise and the conversion or limited development of buildings in rural areas. Development is subject to detailed criteria relating to scale, location, access, environmental impact and the viability of rural enterprises.	No HRA implications. While the policy could give rise to small-scale rural development, this is limited in scale and constrained by detailed criteria, and does not materially influence the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, effects on Habitats sites are not considered likely.

Policy number/ name	Policy detail	HRA implications
Policy EMP5 – Tourism and the Visitor Economy	The policy supports the sustainable growth and diversification of the visitor economy, including new or upgraded visitor attractions and accommodation. Development is subject to detailed criteria relating to scale, accessibility, environmental impact and the protection of local character.	No HRA implications. The policy is criteria-based and does not allocate development or materially alter the scale or spatial distribution of growth. While it supports tourism development, this is limited and controlled, and does not introduce a mechanism by which significant increases in recreational pressure or traffic affecting Habitats sites would occur.
Policy IN1 – Infrastructure Delivery	The policy requires that all new development is supported by appropriate infrastructure and services, including transport, education, health, utilities and green infrastructure. It ensures that infrastructure is delivered alongside development and establishes requirements for capacity, mitigation and phasing.	No HRA implications. The policy relates to the delivery and coordination of infrastructure required to support development already established through the Local Plan strategy. It is mitigation-focused and does not generate additional development or activity. As such, it does not have a mechanism to give rise to effects on Habitats sites.
Policy CC1 – Mitigating and Adapting to the Impacts of Climate Change	The policy promotes sustainable development and requires measures to address climate change, including reductions in carbon emissions, energy efficiency and sustainable construction. It sets criteria for how development should minimise environmental impacts.	No HRA implications. The policy is mitigation-focused and seeks to reduce the environmental effects of development, including emissions and resource use. It does not

Policy number/ name	Policy detail	HRA implications
		generate additional development or activity beyond that established through the Local Plan strategy and therefore has no mechanism to result in effects on Habitats sites.
Policy CC2 – Sustainable Design and Construction	The policy requires development to minimise carbon emissions and energy use through application of the energy hierarchy, including energy efficiency and use of low carbon and renewable energy. It also requires consideration of whole life carbon, sustainable construction, climate resilience, and the use of recognised sustainability standards to reduce environmental impacts and improve long-term performance.	No HRA implications. The policy is a criteria-based and mitigation-focused policy which seeks to reduce carbon emissions, improve energy efficiency, and minimise the environmental impacts of development. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it influences how development is designed and delivered to reduce its environmental footprint. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy CC3 – Low Carbon and Renewable Energy	The policy supports the incorporation and delivery of low carbon and renewable energy generation within development, including on-site generation, energy storage and connections to decentralised energy networks. It also supports standalone renewable energy proposals, subject to criteria relating to location, environmental impact, landscape, amenity and infrastructure, and requires appropriate mitigation and restoration measures.	No HRA implications. The policy is a criteria-based and mitigation-focused policy which supports the provision of low carbon and renewable energy infrastructure while ensuring that

Policy number/ name	Policy detail	HRA implications
		<p>environmental and landscape impacts are appropriately controlled. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. While it enables renewable energy development, this is subject to detailed criteria and does not represent a significant source of development or activity at the plan level. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy CC4 – Tree Planting</p>	<p>The policy requires development to deliver new tree planting and high-quality landscaping, including minimum tree planting standards for residential and non-residential development. It promotes the use of appropriate species, supports habitat connectivity, and requires long-term management and maintenance of landscaping. Where on-site planting is not feasible, off-site provision or contributions may be required.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and enhancement-focused policy which requires tree planting and landscaping as part of development proposals, contributing to biodiversity, landscape quality and climate resilience. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely</p>

Policy number/ name	Policy detail	HRA implications
		significant effects on Habitats sites.
Policy DE1 – Community Engagement	Requires development proposals to demonstrate how local community views have been actively sought and used to influence design. For larger or specified schemes, a Community Review Panel must be established, with its findings informing the proposal. The level of engagement should be proportionate to the scale and impact of development.	The policy is a criteria-based and process-focused policy which promotes effective community engagement in the preparation of development proposals, supporting improved design outcomes and local accountability. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy DE2 – Design Advisory Panel	The policy requires major and significant development proposals to engage with the Council’s Design Advisory Panel (DAP) through Planning Performance Agreements and design review processes. It sets out thresholds for review and requires applicants to demonstrate how feedback from the Panel has been considered in the evolution of proposals.	No HRA implications. The policy operates as a governance and quality assurance mechanism to improve the design of development proposals. It does not result in additional development or affect the scale or location of growth set out in the Local Plan strategy and therefore has no mechanism by which it

Policy number/ name	Policy detail	HRA implications
		could give rise to effects on Habitats sites.
Policy DE3 – Ensuring Design Quality	The policy requires new development to demonstrate high-quality design through adherence to national and local design guidance, including the National Design Guide and local character studies. It ensures that development reflects local character, context and identity, supported by design evidence such as Design and Access Statements and, for larger schemes, 3D modelling.	No HRA implications. The policy controls the design, appearance and quality of development proposals but does not result in additional development beyond that established through the Local Plan strategy. It therefore has no mechanism by which it could give rise to effects on Habitats sites.
Policy DE4 – Design Codes	The policy requires development proposals of more than 20 dwellings to prepare and submit a Design Code as part of the application process. The Design Code must be prepared in accordance with national guidance and developed in collaboration with the Council and local community to guide the form and quality of development.	No HRA implications. The policy controls how development is designed and delivered but does not result in additional development beyond that established through the Local Plan strategy. It therefore has no mechanism by which it could give rise to effects on Habitats sites.
Policy BW1 – Safeguarding Places for Wildlife and Nature	The policy seeks to protect and enhance biodiversity and geodiversity, including designated sites such as SSSIs and locally designated sites. It requires development to avoid adverse impacts, apply the mitigation hierarchy, and support ecological enhancement and resilience to climate change.	No HRA implications. The policy is protective in nature and applies a mitigation hierarchy to ensure that development avoids or reduces harm to biodiversity and geodiversity. It does not allocate

Policy number/ name	Policy detail	HRA implications
		development or increase the scale or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could result in likely significant effects on Habitats sites.
Policy BW2 – Blue-Green Infrastructure	The policy seeks to protect, retain, restore and enhance the District’s Blue-Green Infrastructure (BGI) network. It requires development to assess existing BGI features, maximise opportunities for new provision, ensure connectivity, and deliver multifunctional and climate-resilient infrastructure that is appropriately managed and maintained over the long term.	No HRA implications. The policy is protective and enhancement-focused, requiring development to retain, restore and enhance blue-green infrastructure and maximise opportunities for its provision. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy BW3 – Biodiversity in New Development	The policy seeks to protect and enhance biodiversity across the District. It requires development to apply the mitigation hierarchy, minimise impacts, and conserve, restore and enhance habitats, ecological networks and species. Proposals must demonstrate alignment with the Kent and Medway Local Nature Recovery Strategy and avoid harm to irreplaceable habitats. The policy requires qualifying development to deliver at least 10% biodiversity net gain, prioritising on-site provision, with off-site delivery only where justified and in accordance with a defined hierarchy.	No HRA implications. The policy is protective and mitigation-focused, seeking to ensure that biodiversity is conserved and enhanced through the application of the mitigation hierarchy and the delivery of biodiversity net gain. It does not

Policy number/ name	Policy detail	HRA implications
		<p>allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy AF1 – Ashdown Forest</p>	<p>The policy seeks to protect the Ashdown Forest SPA and SAC from adverse effects arising from development. It requires proposals with potential likely significant effects, including residential development within 7km and development generating traffic affecting the SAC, to demonstrate through Habitats Regulations Assessment that there will be no adverse effect on site integrity. The policy requires mitigation measures, including contributions to Strategic Access Management and Monitoring (SAMM), provision of Suitable Alternative Natural Greenspace, and appropriate air quality assessment where traffic increases exceed defined thresholds.</p>	<p>No HRA implications (protective policy). The policy recognises potential pathways for effects on the Ashdown Forest SPA and SAC, including recreational pressure and air quality impacts from traffic. It operates as a protective and mitigation-based policy, requiring project-level Habitats Regulations Assessment and the implementation of avoidance and mitigation measures to ensure that adverse effects on site integrity are prevented. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it provides safeguards to address potential effects. As such, it will not give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy NE1 – Landscapes Including National Landscapes	The policy seeks to conserve and enhance the landscape character of the District, requiring development to be informed by landscape character assessments and to demonstrate how impacts on key characteristics and sensitivities are avoided or mitigated. It provides strong protection for the Kent Downs and High Weald National Landscapes, requiring development to conserve and enhance their natural beauty, limit the scale of development, and only permit major development in exceptional circumstances where it is in the public interest. Development within the setting of National Landscapes must also avoid or mitigate adverse impacts and be sensitively designed.	No HRA implications. The policy is protective and criteria-based, requiring development to conserve and enhance landscape character and avoid or mitigate adverse impacts, including within designated National Landscapes and their setting. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy W1 – Flood Risk	The policy seeks to manage flood risk by directing development away from areas at risk through application of the sequential and exception tests, and avoiding inappropriate development in Flood Zones 3a and 3b. It requires site-specific flood risk assessments where necessary and the incorporation of flood mitigation, resilience and nature-based solutions to avoid increasing flood risk and, where possible, reduce risk across the wider catchment. The policy also seeks to restore natural watercourses and resist culverting.	No HRA implications. The policy is protective and mitigation-focused, requiring development to avoid areas at risk of flooding and to incorporate measures to manage and reduce flood risk. It also promotes the use of nature-based solutions and restoration of natural watercourses. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely

Policy number/ name	Policy detail	HRA implications
		significant effects on Habitats sites.
Policy W2 – Surface Water Management	The policy requires development to incorporate sustainable drainage systems (SuDS) to manage surface water runoff, ensuring flood risk and pollution are not increased both on-site and within the wider catchment. It sets out a drainage hierarchy, prioritising infiltration and nature-based solutions, and requires SuDS to be integrated into site design, deliver water quality improvements, and provide multifunctional benefits. The policy also requires appropriate long-term maintenance and restricts unacceptable drainage practices, including discharge to foul-only sewers.	No HRA implications. The policy is mitigation-focused, requiring development to manage surface water runoff and protect water quality through the use of sustainable drainage systems. It ensures that flood risk and pollution are not increased and promotes nature-based solutions. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy W3 – Water Supply and Quality	The policy seeks to ensure the sustainable use of water resources and protect water quality. It requires development to demonstrate that adequate water supply and wastewater infrastructure capacity exists, prioritises connection to the public sewer network, and requires water efficiency measures. It also requires development to avoid adverse impacts on surface and groundwater bodies, protect sensitive environments such as chalk streams, incorporate appropriate mitigation, and maintain buffer zones to support water quality and ecological function.	No HRA implications. The policy is protective and mitigation-focused, requiring development to ensure adequate water infrastructure capacity, minimise water use, and avoid adverse impacts on water quality and water bodies. It seeks to safeguard sensitive environments, including groundwater and chalk streams, and requires appropriate mitigation where risks are

Policy number/ name	Policy detail	HRA implications
		<p>identified. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy AQ1 – Air Quality</p>	<p>The policy seeks to ensure that development has a positive or neutral impact on air quality and does not give rise to unacceptable impacts on human health or ecological receptors, including designated nature conservation sites. It requires proposals to assess air quality impacts, incorporate mitigation measures where necessary, and contribute to air quality improvements. Air Quality Impact Assessments are required for major development and proposals likely to affect sensitive receptors, and development resulting in unacceptable impacts that cannot be mitigated will be refused.</p>	<p>No HRA implications.</p> <p>The policy recognises that development may give rise to air quality impacts, including effects on ecological receptors such as designated nature conservation sites. It operates as a protective and mitigation-based policy, requiring assessment of impacts and the implementation of measures to avoid or reduce adverse effects. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it provides safeguards to ensure that impacts are appropriately managed. As such, it will not give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy H1 – Housing Mix	The policy seeks to ensure that new housing development delivers a range of house sizes, types and tenures to meet identified needs. It requires proposals to reflect housing needs evidence and meet accessibility, space and sustainability standards.	No HRA implications. The policy is a criteria-based development management policy which influences the type, mix and quality of housing delivered. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H2 – Provision of Affordable Housing	The policy seeks to increase the delivery of affordable housing through new residential development. It sets thresholds and requirements for affordable housing provision, including tenure mix, on-site delivery or financial contributions, and viability considerations, to ensure that development contributes to meeting identified housing needs.	No HRA implications. The policy is a criteria-based development management policy which requires a proportion of affordable housing to be provided as part of residential development. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H3 – Housing in	The policy supports the delivery of rural exception housing schemes to meet specific identified local needs. It allows housing development in rural areas, including within designated protected areas, where it can be demonstrated that a local need exists	No HRA implications. The policy is a criteria-based

Policy number/ name	Policy detail	HRA implications
Rural Areas	and cannot be met elsewhere, subject to site selection criteria and viability considerations. Schemes are expected to provide 100% affordable housing, although a limited element of market housing may be permitted where necessary to ensure deliverability.	development management policy which enables small-scale rural exception housing to meet identified local needs. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it provides a mechanism for delivering specific types of housing within the overall growth framework. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H4 – Housing for Older People	The policy supports the delivery of housing for older people, requiring developments to meet identified needs and comply with specific locational, accessibility, and design criteria. It encourages provision of older persons’ accommodation within suitable developments and confirms that such housing contributes towards the overall housing requirement.	No HRA implications. The policy is a criteria-based development management policy which guides the provision, location and design of housing for older people. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H5 –	The policy supports the delivery of Build to Rent housing within the main urban areas of the District. It sets criteria relating to location, tenure, affordable housing provision, management arrangements and design standards, and encourages the inclusion	No HRA implications.

Policy number/ name	Policy detail	HRA implications
Build to Rent	of Build to Rent units within larger developments where appropriate and viable.	The policy is a criteria-based development management policy which guides the provision, location and form of Build to Rent housing. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H6 – Smaller Sites	The policy supports small-scale housing development on qualifying sites, requiring proposals to make efficient use of land, contribute to identified housing needs, and meet design and sustainability standards. It also ensures that any loss of existing uses is appropriately justified and addressed.	No HRA implications. The policy is a criteria-based development management policy which guides the delivery and design of small-scale housing development. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H7 – Housing Density and Intensification	The policy encourages efficient use of land by promoting higher density housing development where appropriate. It sets density ranges for different locations within the settlement hierarchy and requires proposals to achieve higher densities in sustainable locations, whilst ensuring that local character and amenity are not harmed.	No HRA implications. This is a criteria-based development management policy which guides the density and

Policy number/ name	Policy detail	HRA implications
		layout of housing development. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy H8 – Self-Build and Custom Housebuilding	The policy supports the delivery of self-build and custom housebuilding, requiring proposals to be sustainably located, appropriately designed, and served by suitable infrastructure. It sets requirements for the provision of serviced plots within larger housing developments, subject to demand and viability considerations, and allows for provision through Neighbourhood Plans and rural exception sites.	No HRA implications. The policy is a criteria-based development management policy which guides the provision and delivery of self-build and custom housebuilding. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy TLC1 – Town and Local Centres	The policy supports the vitality and viability of town and local centres by promoting a town centres-first approach for retail, leisure and other main town centre uses. It defines town centre boundaries and requires development to be located appropriately, retain key services, and contribute to the functioning, accessibility and quality of these centres. It also supports residential development within town centres and small-scale retail provision within strategic sites.	No HRA implications. The policy is a criteria-based development management policy which manages the location and type of town centre and retail development. It does not allocate development or increase the

Policy number/ name	Policy detail	HRA implications
		<p>overall quantum or spatial distribution of growth established through the Local Plan strategy. While it may influence the location of certain uses within defined centres, it does not result in additional development or activity beyond that already accounted for. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy SEV1 – Sevenoaks Town Centre</p>	<p>The policy supports the implementation of the Sevenoaks Town Neighbourhood Plan and promotes place-making within the town centre. It requires development proposals to demonstrate how they contribute to identified priorities, including enhancing key assets, delivering cultural and leisure provision, supporting inclusive growth, and improving connections, public realm and accessibility.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based place-making policy which supports the delivery of development in accordance with the adopted Neighbourhood Plan and town centre strategies. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it guides how development proposals should contribute to the character, function and regeneration of Sevenoaks Town. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy SWN1 – Swanley Town Centre	The policy supports the implementation of the Swanley Neighbourhood Plan and promotes place-making within the town centre. It requires development proposals to demonstrate how they contribute to the town’s vision, including supporting higher density development in appropriate locations, enhancing the town centre offer, improving connectivity and public realm, and delivering a mix of uses including housing, employment and community facilities.	No HRA implications. The policy is a criteria-based place-making policy which supports the delivery of development in accordance with the adopted Neighbourhood Plan and related strategies. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. Instead, it guides how development proposals should contribute to the character, function and regeneration of Swanley Town. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy EDN1 – Edenbridge Town Centre	The policy supports place-making and regeneration within Edenbridge Town Centre, requiring development proposals to demonstrate how they contribute to identified priorities, including enhancing the historic High Street, revitalising key areas such as the Leathermarket site, supporting tourism and town centre uses, and improving accessibility, connectivity and community infrastructure.	No HRA implications. The policy is a criteria-based place-making policy which supports regeneration and development within Edenbridge Town Centre in accordance with the Local Plan strategy. It does not allocate development or alter the overall scale or spatial distribution of growth. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.

Policy number/ name	Policy detail	HRA implications
<p>Policy WST1 – Westerham Town Centre</p>	<p>The policy supports place-making and regeneration within Westerham Town Centre, requiring development proposals to demonstrate how they contribute to the town’s character, accessibility and visitor offer. It promotes enhancements to the public realm, improved connections to the wider area, particularly the Darent Valley, and encourages sustainable transport and a broader range of services and facilities.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based place-making policy which guides how development proposals should contribute to the character, function and regeneration of Westerham Town Centre. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy NAG1 – New Ash Green Village Centre</p>	<p>The policy supports place-making and regeneration within New Ash Green Village Centre, requiring development proposals to demonstrate how they contribute to strengthening the village centre, supporting local businesses, enhancing the public realm, improving accessibility and transport connections, and respecting the area’s distinctive character.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based place-making policy which guides how development proposals should contribute to the function, character and vitality of New Ash Green Village Centre. It does not allocate development or increase the overall quantum or spatial distribution of growth established through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy HW1 – Health and Wellbeing	Supports development that promotes healthy living, social inclusion, and community cohesion. Requires proposals to be well located for access to services, support active travel, ensure safe and inclusive design, and provide access to green space. Larger or relevant developments must be informed by a Health Impact Assessment (HIA), with mitigation required where adverse health impacts are identified.	No HRA implications. The policy is a criteria-based and health-focused policy which promotes healthy, safe, and inclusive communities through design, accessibility, and the provision of green infrastructure and services. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it may lead to minor positive effects by improving health outcomes and environmental quality, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HW2 – Hot Food Takeaway and Evening Economy	Seeks to promote healthy and vibrant town centres by managing the location and concentration of hot food takeaways, particularly in relation to schools and areas of health concern. Supports a balanced evening economy by requiring proposals to complement surrounding uses, protect amenity, encourage sustainable transport, and consider opportunities for daytime activation.	No HRA implications. The policy is a criteria-based and management-focused policy which seeks to promote healthier environments and support the vitality and viability of town centres through the regulation of specific uses, including hot food takeaways and evening economy activities. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established

Policy number/ name	Policy detail	HRA implications
		through the Local Plan strategy. As such, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HW3 – Environmental Nuisance and Pollution	Seeks to prevent development that would result in unacceptable levels of pollution, including light, noise, odour, vibration, and land contamination. Requires proposals to mitigate impacts on human health, amenity, biodiversity, and the wider environment. Development on contaminated land must be supported by investigation, risk assessment, and appropriate remediation, with safeguards secured where necessary.	No HRA implications. The policy is a criteria-based and mitigation-focused policy which seeks to prevent and manage pollution and land contamination, safeguarding human health, environmental quality, and biodiversity. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports environmental protection and may result in positive effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HEN1 – Protecting and Enhancing the Historic Environment	Requires development proposals affecting heritage assets to conserve and, where appropriate, enhance the historic environment, including both designated and non-designated assets and their settings. Proposals must respond sensitively to local character and be informed by relevant evidence, guidance, and best practice, including Historic England advice and local heritage assessments.	No HRA implications. The policy is a criteria-based and conservation-focused policy which seeks to protect and enhance designated and non-designated heritage assets and their settings, ensuring development is informed

Policy number/ name	Policy detail	HRA implications
		<p>by their significance and local character. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports the protection of cultural heritage and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy HEN2 – Sensitively Managing Change in the Historic Environment</p>	<p>Requires development proposals affecting heritage assets to be supported by appropriate statements demonstrating the identification and assessment of heritage assets and their significance. Proposals must show how this understanding has informed the design to conserve, and where appropriate enhance, heritage assets and local historic character, while minimising and mitigating harm.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and assessment-focused policy which ensures that development proposals affecting heritage assets are informed by an understanding of their significance and setting, supporting their conservation and enhancement. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it promotes the protection of cultural heritage and may result in positive effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy HEN 3 - Archaeology	Requires archaeological assessment where development may affect known or potential archaeological assets. Prioritises preservation in situ for non-designated archaeological heritage, with justification required where this is not possible. Encourages interpretation and public engagement, and requires appropriate recording of any heritage assets that may be lost.	No HRA implications. The policy is a criteria-based and conservation-focused policy which seeks to safeguard archaeological assets through assessment, preservation, recording, and interpretation. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it promotes the protection and enhancement of cultural heritage and may result in positive effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HEN4 – Locally Listed Buildings and Assets	Sets out detailed criteria for identifying buildings, structures, and places of local heritage significance for inclusion on the Local List, covering architectural, historic, and townscape value. Requires development affecting locally listed assets to conserve their significance and setting, with support given to proposals that retain and enhance such assets. Harm or loss will be resisted unless outweighed by clear public benefits, and assets may be added or removed from the list based on the defined criteria.	No HRA implications. The policy is a criteria-based and identification-focused policy which establishes a framework for recognising non-designated heritage assets of local importance. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan

Policy number/ name	Policy detail	HRA implications
		strategy. While it supports the conservation of local heritage and may result in positive cultural and environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HEN5 – Responding to Climate Change in the Historic Environment	Supports the conservation and continued beneficial use of heritage assets through sensitive adaptation and conversion. Requires development to preserve significance, minimise harm, and retain historic fabric, ensuring proposals are compatible with the asset’s character, setting, and optimum viable use. Energy efficiency improvements must follow a whole-building approach and avoid harm, with all proposals demonstrating careful, proportionate, and reversible design where appropriate.	No HRA implications. The policy is a criteria-based and conservation-focused policy which promotes the sensitive adaptation, reuse, and long-term sustainability of heritage assets while safeguarding their significance and setting. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports the conservation of cultural heritage and sustainable building practices and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HEN6 - Shopfronts	Seeks to retain and restore historic shopfronts that contribute to the character and visual amenity of buildings and areas. Encourages the enhancement of unsympathetic shopfronts, particularly within conservation areas. Requires new or altered shopfronts and advertisements affecting heritage assets to be sensitively designed in terms of materials, detailing, proportions,	No HRA implications. The policy is a criteria-based and conservation-focused policy which

Policy number/ name	Policy detail	HRA implications
	and illumination, and to respond positively to their surroundings. Retention of traditional shopfronts is expected where historic shops are converted to alternative uses.	seeks to protect and enhance the character of heritage assets and conservation areas through the sensitive design and management of shopfronts and advertisements. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports the conservation of the historic environment and may result in positive visual and cultural effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy HEN7 – Historic Parks and Gardens	Supports development that conserves and, where appropriate, enhances the significance and setting of Historic Parks and Gardens, including those of local importance. Requires proposals to respect landscape character, layout, and features, consider cumulative impacts, and provide clear justification where harm may occur, demonstrating that this is outweighed by public benefits.	No HRA implications. The policy is a criteria-based and conservation-focused policy which seeks to protect and enhance Historic Parks and Gardens and their settings, including their landscape character and significance. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports the conservation of heritage

Policy number/ name	Policy detail	HRA implications
		landscapes and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy AGS1 – Agricultural Land and Soil	Seeks to protect agricultural land, particularly best and most versatile (BMV) land, by requiring justification for its loss and careful consideration of impacts on farming, natural capital, and ecosystem services. Requires applicants to use up-to-date agricultural land classification data and encourages sustainable management and reuse of soils in major development.	No HRA implications. The policy is a criteria-based and protection-focused policy which seeks to safeguard agricultural land and soils as important environmental and economic resources. It does not allocate sites, introduce new development, or alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports soil conservation and sustainable land use and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy OS1 – Open Space and Recreation	Seeks to protect existing open spaces and requires new residential development to provide high-quality, accessible open space in line with Fields in Trust standards. Emphasises multi-functional design to support recreation, health, biodiversity, and climate resilience, with flexibility for off-site provision or contributions where appropriate. Requires long-term management and maintenance arrangements for all new open space.	No HRA implications. The policy is a criteria-based and protection- and provision-focused policy which seeks to safeguard existing open spaces and secure the delivery of new, high-quality

Policy number/ name	Policy detail	HRA implications
		<p>recreational space as part of development. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports green infrastructure, biodiversity, and health and wellbeing and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy OS2 – Children and Young People’s Play Space</p>	<p>Requires major residential development to provide children and young people’s play space in line with Fields in Trust standards, including appropriate types of play provision based on development size. Emphasises high-quality, inclusive, accessible, and well-designed play spaces with long-term management arrangements. Allows financial contributions for smaller developments where on-site provision is not feasible.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and provision-focused policy which seeks to ensure the delivery of high-quality, accessible play space as part of residential development, supporting healthy and inclusive communities. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports health, wellbeing, and green infrastructure and may result in positive social and environmental effects, it has no</p>

Policy number/ name	Policy detail	HRA implications
		mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy ED1 – Education	Requires development to support the provision of sufficient, high-quality education facilities, including schools and specialist provision, to meet needs arising from growth. Major residential development must contribute to education infrastructure through funding or land provision, with a preference for integrated school sites rather than split-site arrangements.	No HRA implications. The policy is a criteria-based and infrastructure-focused policy which seeks to ensure that adequate education provision is delivered to support new development. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports social infrastructure and sustainable communities and may result in positive social effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy SL1 – Sports and Leisure Facilities	Seeks to protect existing sports and leisure facilities unless replacement provision of equal or better quality is delivered. Supports the enhancement and expansion of facilities to meet identified needs, with requirements for high-quality, accessible, and inclusive provision. Major residential developments must provide on-site facilities or financial contributions, while redevelopment must prioritise retention or replacement of existing uses. Encourages community access, dual use of facilities, and the development of strategically important sporting infrastructure.	No HRA implications. The policy is a criteria-based and protection- and provision-focused policy which seeks to safeguard existing sports and leisure facilities and secure enhanced provision to meet community needs. It does not

Policy number/ name	Policy detail	HRA implications
		<p>allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports health, wellbeing, and community infrastructure and may result in positive social and environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy COM1 – Retention of Community Uses</p>	<p>Requires development to plan for and deliver appropriate community facilities to support sustainable communities, ensuring provision reflects identified needs and is well located and accessible. Supports new and enhanced community uses, while strongly resisting the loss of existing facilities unless specific criteria are met. Prioritises the reuse of vacant community buildings and only permits alternative uses where no community need exists or provision is replaced within wider schemes.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and provision- and protection-focused policy which seeks to ensure the delivery and retention of community facilities to support sustainable and well-functioning communities. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports social infrastructure and community cohesion and may result in positive social effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
<p>Policy UD1 – Utilities and Digital Infrastructure</p>	<p>Requires development to ensure sufficient utility infrastructure capacity, supported by early engagement with providers and appropriate phasing. Secures necessary upgrades through planning conditions or legal agreements, with safeguards to protect water quality and infrastructure operation. Supports the delivery and enhancement of digital infrastructure, requiring new development to incorporate and improve connectivity, particularly in underserved areas.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and infrastructure-focused policy which seeks to ensure that utilities and digital infrastructure are delivered in a coordinated and sustainable manner to support development. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it promotes efficient infrastructure delivery and improved environmental protection, including water quality, and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy T1 – Sustainable Movement Network</p>	<p>Promotes a coordinated, strategic approach to transport planning to support sustainable development. Prioritises active travel, public transport, and reduced reliance on private vehicles through integrated infrastructure, improved connectivity, and partnership working. Encourages locating development near sustainable transport options and enhancing walking, cycling, and public transport networks, while supporting low-emission transport and improved accessibility across the District.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and strategy-focused policy which promotes sustainable transport, prioritising active travel and public transport, and reducing reliance on private car use. It does not allocate sites or introduce new</p>

Policy number/ name	Policy detail	HRA implications
		<p>development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports improved air quality and reduced emissions and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>
<p>Policy T2 – Sustainable Movement</p>	<p>Requires development to prioritise sustainable transport through design and layout, following a clear transport hierarchy that favours walking, cycling, and public transport over private car use. Ensures integration with existing transport networks, including public rights of way and active travel routes, and requires contributions to wider transport infrastructure where necessary. Supports provision of electric vehicle infrastructure and shared transport schemes to improve accessibility and reduce reliance on private vehicles.</p>	<p>No HRA implications.</p> <p>The policy is a criteria-based and design- and infrastructure-focused policy which promotes sustainable transport, reduces reliance on private car use, and supports improved connectivity through walking, cycling, and public transport. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports reduced emissions and improved air quality and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

Policy number/ name	Policy detail	HRA implications
Policy T3 – Vehicle Parking	Requires development to provide appropriate and proportionate vehicle parking, informed by local context, accessibility, and sustainable transport opportunities. Emphasises flexible parking provision in accessible locations, high-quality design and layout, and integration with the movement hierarchy to prioritise active travel. Supports provision of electric vehicle infrastructure and secure cycle parking, while ensuring parking does not harm the public realm or create safety or capacity issues.	No HRA implications. The policy is a criteria-based and design- and management-focused policy which seeks to ensure appropriate and sustainable provision of vehicle parking, while supporting active travel and reducing reliance on private car use. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports improved design, reduced emissions, and sustainable transport choices and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.
Policy T4 – Transport Statements, Assessments	Requires development proposals to assess and manage their transport impacts through proportionate Transport Assessments or Statements. Ensures consideration of cumulative impacts and accessibility by sustainable modes, with Travel Plans required where appropriate to promote modal shift. Requires mitigation measures to be identified, prioritised, and delivered to address impacts on the transport network, including public transport and active travel infrastructure.	No HRA implications. The policy is a criteria-based and assessment- and mitigation-focused policy which seeks to

Policy number/ name	Policy detail	HRA implications
and Plans		<p>ensure that the transport impacts of development are properly assessed and managed, while promoting sustainable travel choices and reducing reliance on private car use. It does not allocate sites or introduce new development, nor does it alter the overall scale, location, or distribution of growth established through the Local Plan strategy. While it supports reduced emissions and improved transport efficiency and may result in positive environmental effects, it has no mechanism by which it could give rise to likely significant effects on Habitats sites.</p>

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